

Brussels, 3 May 2022

Subject: Alternative fuels infrastructure targets must be ambitious to allow for a wide deployment of zero-emission vehicles in the EU

The International Road Transport Union (IRU), European Automobile Manufacturers' Association (ACEA), Transport & Environment (T&E) and Hydrogen Europe (HE) urgently call on Member States and Members of European Parliament to set ambitious and timely targets for the deployment of alternative fuels infrastructure in the European Union (EU).

The European Commission's proposal to revise rules for the deployment of alternative fuels infrastructure (AFIR), published on 14 July 2021 as part of the Fit for 55 Package, delivered a good starting point in terms of the ambition required to decarbonise the goods and passenger road transport sectors. Lowering the ambition – especially in terms of timing – could lead to a significant setback in achieving the objectives of the European Green Deal.

An ambitious AFIR is key to ensure that infrastructure and zero-emission vehicles are rolled out simultaneously across the EU. This would grant further confidence to all stakeholders, from vehicle manufacturers to transport operators and infrastructure providers. To achieve this, alternative fuels infrastructure targets for heavy-duty vehicles – for both battery-electric and hydrogen-fuelled – on the core and comprehensive sections of the Trans-European Road Transport (TEN-T) Network should remain ambitious.

Battery-electric heavy-duty vehicles are already beginning to hit the market, with increasingly wider offerings also for long-haul operations expected soon. Therefore, it is crucial to have ambitious mandatory TEN-T targets from 2025 at the latest. Targets should also be extended to safe and secure parking areas from 2025 onwards. Equally important, hydrogen refuelling stations have to be fully deployed along both the TEN-T core and comprehensive road networks with sufficient minimum daily capacities by meeting the AFIR targets at the latest by 2030, while ensuring that the pre-2030 ambition matches the roll-out of hydrogen-fuelled heavy-duty vehicles in the second half of this decade.

Furthermore, ambitious objectives and targets should be set for urban nodes, since zero-emission heavy- and light-duty vehicles have an important role to play in reducing emissions in European cities.

Commercial road transport operators stand ready to shift to alternatives. Despite the industry's willingness to embrace alternatively fuelled vehicles, the electric recharging and hydrogen refuelling infrastructure that is suitable for heavy-duty vehicles and indispensable for their operation is still largely missing and far from what is necessary to make a real impact.

It is therefore imperative for the AFIR to rapidly set minimum requirements for the establishment of a comprehensive, reliable, evenly distributed and interconnected network of alternative fuels infrastructure across the entire EU. An EU-wide backbone infrastructure is



especially important, given the trans-national nature of the European road haulage and mobility industries. Europe cannot afford a patchwork of 27 different infrastructure plans.

On behalf of the signatories, we urge Member States and Members of European Parliament to set ambitious provisions for electric recharging and hydrogen refuelling infrastructure, which will allow for the rapid uptake of zero-emission vehicles.

CC: Ministers of Transport of EU Member States, European Parliament's Committee on Transport and Tourism (TRAN) Rapporteur and Shadow Rapporteurs for the European Commission's proposal to revise EU rules on the deployment of alternative fuels infrastructure



Raluca Marian, Director EU Advocacy and General Delegate, IRU Permanent Delegation to the EU

Eric-Mark Huitema, Director General, European Automobile Manufacturers' Association (ACEA)

Jorgo Chatzimarkakis, Chief Executive Officer, Hydrogen Europe

Julia Poliscanova, Senior Director, Vehicles and E-Mobility, Transport & Environment

ABOUT IRU

IRU is the world's road transport organisation, promoting economic growth, prosperity and safety through the sustainable mobility of people and goods. Founded in 1948, IRU has members and activities in more than 100 countries. www.iru.org

ABOUT ACEA

The European Automobile Manufacturers' Association (ACEA) represents the 16 major Europe-based car, van, truck and bus makers: BMW Group, DAF Trucks, Daimler Truck, Ferrari, Ford of Europe, Honda Motor Europe, Hyundai Motor Europe, Iveco Group, Jaguar Land Rover, Mercedes-Benz, Renault Group, Stellantis, Toyota Motor Europe, Volkswagen Group, Volvo Cars, and Volvo Group. www.acea.auto

ABOUT HYDROGEN EUROPE

Hydrogen Europe is the leading organization representing European based companies and stakeholders that are committed to moving towards a (circular) carbon neutral economy. Our vision is to propel global carbon neutrality by accelerating European hydrogen industry and we are the industrial key partner of the Clean Hydrogen partnership. For more info, please visit www.hydrogeneurope.eu.

ABOUT T&E

Transport & Environment's (T&E) vision is a zero-emission mobility system that is affordable and has minimal impacts on our health, climate and environment. Created over 30 years ago, T&E has shaped some of Europe's most important environmental laws. www.transportenvironment.org