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Review of Regulation (EU)2023/1804 on the deployment of alternative fuels infrastructure (AFIR)

Fleet Cards Europe accompanying document

Introduction

[Fleet Cards Europe](#) (FCE) welcomes the opportunity to contribute to the upcoming review of the Alternative Fuels Infrastructure Regulation (AFIR). As a complement to its response to the public consultation questionnaire, FCE submits this paper to provide additional context, evidence and rationale underpinning the positions expressed in its contribution.

As trusted partners to fleet operators across Europe, serving businesses of all sizes and vehicle types, FCE members are uniquely positioned to represent the operational realities, challenges and priorities of commercial fleets. As e-Mobility Service Providers (eMSPs) and providers of access to a broad range of energy types, fleet card companies have first-hand experience of the opportunities and challenges associated with enabling the transition to lower-emission transport, including pricing, customer access, interoperability, roaming and digital services. As intermediaries between fleet managers and energy providers, fleet card companies play a key role in connecting supply and demand across the mobility ecosystem. Through their daily interactions with all stakeholders, FCE members have a comprehensive understanding of the practical constraints faced by infrastructure and energy providers, as well as fleet operators, and are therefore well placed to ensure that these perspectives are effectively reflected in the policymaking process.

FCE and its members are fully committed to supporting the decarbonisation of road transport, in line with the objectives of the European Green Deal. A successful transition requires a regulatory framework that enables investment, supports market development and recognises the diversity of operational needs across different segments of road transport.

Against this background, FCE would like to highlight the following key considerations and recommendations for the AFIR review.

- **Recognise the distinct roles of Charging Point Operators (CPOs) and e-Mobility Service Providers (eMSPs)** within the charging value chain, including the value-added services provided by eMSPs to commercial fleet operators.
- **Preserve commercial flexibility** by allowing market participants to develop and negotiate pricing models and contractual arrangements in a competitive environment.
- **Maintain the existing EV charging targets for light-duty vehicles (LDVs)** to preserve regulatory certainty and support continued market-driven infrastructure deployment.
- **Complement the existing framework for heavy-duty vehicle (HDV) charging infrastructure** with a stronger focus on operationally relevant infrastructure deployment, particularly widespread open-access depot charging, while preserving flexibility and a demand-driven, market-led approach to infrastructure rollout beyond the TEN-T network.
- **Address the underlying barriers to hydrogen deployment** by strengthening the hydrogen value chain, increasing supply availability, reducing costs and stimulating demand for heavy-duty transport, rather than relying on revised infrastructure targets .
- **Ensure a technology-neutral approach under AFIR** by recognising the role of renewable fuels alongside electricity and hydrogen, providing consistent regulatory treatment and equal access to incentives and funding across decarbonisation pathways.

Promoting transparency while preserving competitive pricing

FCE members operate as e-Mobility Service Providers (eMSPs), providing charging access and fleet management services across Europe. In the context of the AFIR review, FCE believes that any discussion on EV charging prices should clearly distinguish the respective roles of Charging Point Operators (CPOs) and eMSPs, as well as the different factors determining the final price paid by users.

Public charging prices are primarily determined by Charging Point Operators (CPOs), which set the base tariff to recover the costs of infrastructure deployment and operation, including installation, land and parking leases, hardware, electricity procurement, grid charges, maintenance and taxes. eMSPs do not determine these base charging prices. Instead, they purchase charging services from CPOs and provide customers with additional value-added services, including roaming access, consolidated billing, invoice processing, fleet management tools, tax refund services, customer support and digital platforms. These services create significant value for users and contribute to the overall development of the EV market, particularly in the commercial B2B fleet segment.

The level of charging prices is largely driven by factors outside the scope of AFIR, including wholesale electricity prices, national grid tariffs, network charges established by national regulatory authorities, infrastructure investment costs and the level of competition between charging providers.

The consultation should also distinguish between retail (B2C) and commercial fleet (B2B) charging markets. Price transparency challenges are significantly less pronounced for professional fleet operators, who typically purchase charging services under negotiated contractual arrangements. In this competitive market, eMSPs differentiate themselves through pricing models, service offering, roaming coverage and digital solutions. They also create value across the charging ecosystem by acting as volume aggregators, assuming credit risk and providing ancillary services.

The EV charging market is already characterised by competition, diverse business models and differentiated services responding to customer needs. Price differences reflect a range of factors, including energy costs, grid structures and service offerings.

FCE strongly opposes the introduction of additional price regulation under AFIR. The existing requirements for transparent, non-discriminatory and cost-reflective pricing already provide a robust regulatory framework, and there is no reasonable justification for any further intervention.

The AFIR review should preserve the freedom of market participants to negotiate commercial arrangements and pricing models. AFIR has already established a robust framework for price transparency and payment options. Introducing overly prescriptive regulation on pricing risks undermining innovation and limiting the development of competitive market-based solutions. FCE therefore supports requiring national competent authorities to regularly monitor and report on competition in the recharging market and on price developments, as well as ensuring fair tendering and concession practices at Member State level that foster effective competition in the recharging market.

Regulatory efforts should therefore be limited to monitoring market developments, and promoting effective competition, rather than constraining legitimate commercial models or distorting market dynamics.

Maintaining a stable AFIR framework while accelerating infrastructure deployment for heavy-duty transport

AFIR has provided a predictable investment framework for EV charging infrastructure, combining fleet-based targets for light-duty vehicles with distance-based requirements along the TEN-T network. This balanced approach has successfully mobilised private investment while ensuring minimum infrastructure coverage across the EU.

Implementation data demonstrates that the framework is delivering. According to recent analysis by Transport & Environment (T&E), the EU has already exceeded AFIR's fleet-based charging power targets by more than 180%. As of Q1 2026, 23 of the 27 Member States have deployed more than twice the charging power required under AFIR, while 79% of the TEN-T core network already complies with the Regulation's 2025 distance-based targets through the availability of ultra-fast charging infrastructure¹.

The current framework is delivering faster-than-required deployment while providing the regulatory certainty needed to sustain private investment. Reopening the LDV targets at this stage would thus create unnecessary uncertainty without addressing any demonstrated market failure.

¹ Transport & Environment, "Car charging & AFIR targets: where do we stand?", T&E's EV charging progress report 2026, 20 July 2026, <https://www.transportenvironment.org/articles/charging-infrastructure-has-far-outpaced-ev-sales-in-all-but-one-eu-country-analysis>

The AFIR review should maintain the existing EV charging targets for LDVs. The current framework is delivering faster-than-required infrastructure deployment, providing regulatory certainty, and supporting continued private investment across the EU.

By contrast, the situation for heavy-duty vehicles remains fundamentally different. Zero-emission HDV uptake remains limited, with only a 4.4% market share in Q1 2026, far from the 35% share needed by 2030. Moreover, deployment is highly concentrated: almost 90% of battery-electric trucks (≥ 16 tonnes) are registered in just seven Member States, illustrating significant disparities across the European Union².

Infrastructure availability has become one of the most significant barriers to the decarbonisation of commercial road transport. Meeting the CO₂ standards for heavy-duty vehicles will require an average deployment of at least 500 new HDV chargers every month until 2030³. According to the European Commission (2025), even if the infrastructure currently required under AFIR is fully deployed, it would meet only 47% of the demand of electric HDVs by 2030.

FCE supports complementing AFIR's existing framework for HDVs charging with a stronger focus on the operational deployment of infrastructure that reflects the realities of commercial road transport. In particular, greater emphasis should be placed on enabling widespread, open-access depot charging, alongside overnight and destination charging solutions, recognising their central role in supporting efficient fleet operations and large-scale deployment of zero-emission trucks. At the same time, the Regulation should preserve flexibility mechanisms, including traffic thresholds, phased implementation and demand-responsive deployment criteria, to ensure infrastructure is deployed where it is most needed and public and private investments deliver maximum impact.

The AFIR review should also move beyond a purely corridor-based approach. Infrastructure planning should better reflect national and regional characteristics, including freight flows, traffic intensity, distribution capacity and population density, with priority given to logistics hubs, freight terminals, ports, industrial clusters and depots, while progressively extending coverage to secondary roads and underserved areas. Rather than introducing additional or more prescriptive deployment targets, the regulatory framework should facilitate market-led investment and provide the flexibility needed to respond to evolving demand.

² European Automobile Manufacturers' Association (ACEA), *Mapping Europe's zero-emission transformation*, 2026, <https://www.acea.auto/zero-emission-tracker/>

³ European Automobile Manufacturers' Association (ACEA), *Mapping Europe's zero-emission transformation*, 2026, <https://www.acea.auto/zero-emission-tracker/>

Unlike for LDVs, the HDV charging infrastructure is not yet sufficient. The AFIR review should therefore complement HDV infrastructure requirements by placing greater emphasis on the deployment of operationally relevant charging infrastructure, while maintaining appropriate flexibility and a demand-driven approach to deployment beyond the TEN-T network.

Hydrogen infrastructure presents a different challenge. In 2025, only 318 hydrogen refuelling stations were operational across the EU, of which just 168 were equipped with 700-bar dispensers⁴—the pressure standard required for heavy-duty vehicles. By contrast, meeting the 2030 CO₂ reduction targets for vehicle manufacturers will require around 2,000 hydrogen refuelling stations, each with a daily dispensing capacity of at least two tonnes⁵.

However, FCE considers that the slow deployment of hydrogen infrastructure is primarily driven by underlying market conditions rather than by AFIR's deployment targets. The main barriers remain the limited availability of renewable and low-carbon hydrogen, high production and distribution costs, uncertain demand, and the absence of commercially viable business cases for infrastructure operators. Accelerating infrastructure deployment will require addressing these upstream market failures rather than introducing more stringent infrastructure obligations.

FCE therefore supports maintaining a flexible, demand-driven approach to hydrogen infrastructure under AFIR. Policy efforts should instead prioritise measures that strengthen the hydrogen value chain by scaling up hydrogen production, improving supply availability, reducing costs and creating stronger demand signals for heavy-duty transport.

Beyond electricity and hydrogen, AFIR should also reflect the contribution of renewable fuels to the decarbonisation of heavy-duty transport.

⁴ European Alternative Fuels Observatory (EAFO), *European Union (EU27) – Infrastructure*, Available at: <https://alternative-fuels-observatory.ec.europa.eu/transport-mode/road/european-union-eu27/infrastructure> . Accessed 17 July 2026.

⁵ European Automobile Manufacturers' Association (ACEA), *Mapping Europe's zero-emission transformation, 2026*, <https://www.acea.auto/zero-emission-tracker/>

Ensuring a technology-neutral transition

Battery-electric and hydrogen vehicles offer important pathways towards zero-emission transport, but their large-scale deployment requires new powertrains, substantial infrastructure investment and significant operational adaptation. At the same time, internal combustion engine vehicles will continue to represent a significant share of commercial fleets beyond 2035. Sustainable renewable fuels, including HVO, bio-CNG, bio-LNG and e-fuels, can therefore provide an immediate and scalable pathway to reduce fleet emissions while the transition to zero-emission technologies accelerates.

Industry analysis indicates that renewable fuels are expected to remain an important decarbonisation option for road transport in the near term. However, vehicles operating exclusively on eligible renewable fuels (VEEFs), whether retrofitted vehicles or newly produced models compatible with RED-compliant fuels, require a supportive and consistent regulatory framework to enable their market uptake.

The main barrier is not the availability of refuelling infrastructure, but the lack of a coherent European framework that recognises renewable fuels alongside other decarbonisation pathways. The AFIR review should therefore ensure that renewable fuels are appropriately reflected within the Regulation, creating a level playing field across technologies. A technology-neutral framework with consistent incentives will provide greater investment certainty across the value chain and allow all viable decarbonisation solutions to contribute effectively to the transition.

AFIR should adopt a technology-neutral approach that recognises the role of renewable fuels in the heavy-duty transition. Establishing a technology-neutral framework would provide the certainty needed for fleet operators, fuel suppliers and users to fully benefit from all available decarbonisation solutions.

Removing barriers to a more efficient charging market

Finally, while the following issues extend beyond the scope of AFIR, FCE wishes to highlight two practical barriers that could significantly improve the efficiency and competitiveness of Europe's charging ecosystem. FCE would welcome the opportunity to engage with the Commission to further elaborate on our reasoning and discuss potential solutions.

- **Prevent restrictions on the use of publicly funded charging infrastructure.** FCE is concerned by the approach adopted in Germany, whereby depot charging infrastructure financed through public support cannot be made available to third-

party users. Such restrictions undermine the objective of maximising the impact of public investment and risk fragmenting the charging market. FCE therefore calls on the Commission to discourage similar approaches in future national funding schemes and to promote funding conditions that enable publicly supported charging infrastructure to be shared with third parties whenever operationally feasible.

- **Strengthen interoperability for workplace charging.** FCE also wishes to highlight the need to improve operational interoperability for workplace charging points (for example, open access to application programming interfaces, with no restrictions for the transferee, and data transfer). In particular, some market participants continue to face significant barriers when taking over existing charging installations or integrating additional value-added services, such as EV charging management platforms. Promoting greater interoperability would facilitate competition, foster innovation, and help ensure that charging infrastructure remains adaptable throughout its lifecycle.

Conclusion

FCE welcomes the opportunity to contribute to the review of AFIR and remains committed to supporting the development of a competitive, user-centric and future-proof recharging and refuelling ecosystem across Europe. We look forward to continuing the dialogue with the European Commission and stand ready to provide further expertise to support the review process.

About Fleet Cards Europe

Fleet Cards Europe (FCE) is the voice of independent fleet card companies in Europe. It was established in 2021 as a non-profit association to represent the interests of its members and promote more sustainable and digital road transport solutions.

Our membership includes key independent players in this market which are headquartered and operate across the continent. In 2024, FCE members processed an average of 44 transactions per second, representing a total value of €39.1 billion. This highlights their essential role in Europe's corporate mobility ecosystem.

With 14.1 million active devices in use, fleet card companies support the daily operations of Europe's 6.1 million trucks and 31 million vans. The sector plays a key role in accelerating the transition to electric mobility by supporting the expansion and integration of charging networks and advancing the digitalization of fleet management, thereby contributing to a more connected and accessible charging ecosystem. In 2024, FCE members facilitated



approximately 1.9 billion kWh of energy delivery annually, enough to power up to 420,000 high-mileage corporate light-duty vehicles.

At FCE, we monitor initiatives affecting our members and their clients, cooperate with European institutions and national authorities to improve the regulatory framework, and provide a forum for members to share research and best practices.