

## FCE Position on key aspects of the AFIR proposal

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### Introduction

FCE represents independent fuel card issuers. Our members will be agents of the transition towards zero emissions in road transport, especially for the B2B companies and small businesses with fleets. We believe that the revised proposal for the Alternative Fuels Infrastructure Regulation (AFIR) is one of the most important interventions to ensuring that the transition is successful for the road transport sector.

### AFIR Priorities

#### 1. Scale of Infrastructure Provision

We urge policymakers to be bolder and push for a more comprehensive alternative fuels infrastructure network. If emission reduction targets are to be achieved and all are to benefit from the low-carbon future, alternative fuels infrastructure will require a very granular density to avoid range anxiety (along the major transport routes but as well beyond them, ie. on secondary routes, in rural areas, etc.). This is also the case for hydrogen technologies, where infrastructure is currently non-existent and must develop if alternative fuels and energies are to stimulate the investments needed to present a viable alternative to traditional fossil fuels. This evolution, however, should be monitored by short term targets that would allow to rapidly increase the networks.

Policymakers should therefore consider a more dynamic set of requirements, based on the specific characteristics of a given Member State. This could include the population density of the country or the traffic density of given areas, which would avoid instances of companies being penalised due to lack of supply in their locality, or instances where there are considerable teething problems with the switch to new technologies, such as long queues at re-charging / re-fuelling infrastructure. An underlying cause of these teething problems is that the current set of limits in km are not sufficient, and the network lacks granularity.

New refuelling stations could also be located near logistics hubs, depots, terminals and areas in the proximity of ports. This would enable commercial road transport operators' quick and convenient access to alternative fuels.

Finally, it is critical to define both short and long term targets for the infrastructure to ensure a progressive ramp-up of the network to support adoption by fleets.

#### 2. Ensuring a Just Transition

Commercial road goods and passenger transport will require a wide range of alternative fuels for different types of operations, including during the transition period. Making such a transition also entails significant investments for hauliers - many of whom are family-owned SMEs - in the road transport industry which, in many cases, will have to be phased-in over a longer timeframe.

Bio-based Liquid Natural Gas (LNG) will have an important role to play as a “bridging technology” in the clean energy transition. The proposed AFIR does not specify how the refuelling infrastructure for LNG for trucks should be scaled over the coming years. We would welcome the opportunity to work with industry stakeholders and policymakers to define the necessary frequency of publicly accessible LNG refuelling points to be located along the TEN-T network in support of AFIR’s long term objectives.

### 3. Retaining Existing Infrastructure

Although it will gradually be phased out over coming decades, the internal combustion engine will continue to drive commercial vehicles for years to come. Conventionally fuelled internal combustion vehicles will thus likely continue to circulate on European roads until 2035 and remain in use well after.

Accordingly, we ask policymakers to put forward pragmatic legislative measures which take this reality into account and seek to effectively reduce the net emissions of fleets using internal combustion engines during this transition period by continuing to offer cleaner fossil fuel "bridging solution" alternatives to diesel.

### 4. Cutting-edge and open technology

Ensuring there is universal access of charging infrastructure to the public will be essential. We ask that policymakers put in place measures to avoid situations whereby the charging / refuelling operator restricts access to their infrastructure to clients of a given company, or members of the public using a specific technology or a specific brand.

We urge policymakers to maintain that, as per the proposed Art. 5, operators of publicly accessible recharging stations are to provide end-users with the possibility of recharging their vehicle using an array of payment and authentication devices widely used in the EU. Indeed, range anxiety and in-station issues (payment, breakdown, etc.) are among the top items preventing a wider EV adoption by drivers. The extension and construction of new recharging points provides an opportunity to ensure they are equipped with the latest technology, so purchases can be made seamlessly, efficiently and safely across the EU (regardless of the Member State) facilitating road transport.

In the field of e-mobility, in particular, public network providers must allow an array of third-party recognition and not limit the acceptance of cards (be they payment or fuel cards) or apps so that “charging islands” are avoided. Allowing legacy technology solutions will not discourage commercial customers from adopting the use of new fuels while relying on the same method of purchase they use today.

Put simply, technological solutions should be as interconnected as possible. Such an approach should also serve to ensure there is an adequate acceptance infrastructure in place across the EU, meaning no Member State lags behind from a technological perspective.

For further information on our positions or the sector, please contact Marc Erkens (Head of the FCE Sustainability Working Group) at [marc.erkens@dkv-mobility.com](mailto:marc.erkens@dkv-mobility.com) or the FCE Secretariat at [fleetcards@humbrophy.com](mailto:fleetcards@humbrophy.com).



### About FCE

Fleet Cards Europe (FCE) represents the independent fuel card sector in Europe, which facilitates the purchase and supply of fuel and other related on-the-road goods and services for millions of commercial users across Europe. FCE members represent a major share of the B2B fuel cards market in Europe. The majority of European logistics, transportation and other fleet businesses rely on the services (issuing, billing, fuel discounts, etc.) provided by FCE members, helping them to move goods and people efficiently and seamlessly across Europe on a daily basis.