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NOTE

From: General Secretariat of the Council
To: Council

Subject: AOB for the meeting of the Transport, Telecommunication and Energy Council on 4 December 2025
Joint declaration on Challenges of heavy-duty vehicles charging infrastructure
- Information from Bulgaria, Czech Republic, Estonia, Finland, Hungary, Italy, Latvia, Poland, Romania and Slovakia

Estonia will inform delegations about a joint declaration signed by Estonia, Bulgaria, Czechia, Finland, Hungary, Italy, Latvia, Poland, Romania and Slovakia, addressing the challenges faced by Member States in developing heavy-duty vehicle (HDV) charging infrastructure under the Alternative Fuels Infrastructure Regulation (AFIR).

The declaration highlights that while the transition to zero-emission technologies in the transport sector remains a key EU objective, the ambitious AFIR targets were adopted under a different geopolitical and economic context. The impacts of recent crises, including the COVID-19 pandemic and war of aggression against Ukraine, have significantly affected the transport sector's investment capacity and slowed the uptake of zero-emission HDVs.

The signatories of the declaration highlight the need to acknowledge differing geographical, economic and political circumstances faced by the Member States that cause difficulties including insufficient grid capacity, budgetary constraints, and low market demand for HDV chargers, which make full implementation of the current targets by 2030 highly challenging.

In view of the planned AFIR revision in 2026, the signatories call for:

- extending the implementation deadlines for HDV infrastructure targets; and/or
- easing HDV charging network requirements; and/or
- introducing targeted flexibilities and derogations.

The declaration stresses the need for a flexible approach to avoid costly investments into infrastructure that might go underutilised and to ensure that implementation of AFIR remains economically and technically feasible across all Member States.

Annex to AOB: Joint declaration on challenges related to heavy-duty vehicle charging infrastructure

The general aim of greening transport is an important objective in the effort to make the sector sustainable. Within this effort, transitioning the fleets of both light (LDV) and heavy-duty vehicles (HDV) towards Zero-Emission technology is a long-term goal we must of course strive towards. However, the differences that Member States face geographically, economically, and politically must be taken into account.

The ambitious targets of the Alternative Fuels Infrastructure Regulation (AFIR) were set forward in a different geopolitical and economic context. The developments of the last years have undermined the opportunities of some Member States in completing the HDV charging infrastructure targets as they face multiple challenges.

Problem with the demand for charging infrastructure

The road transport sector has faced numerous challenges over the past decade. The COVID crisis and the Russian invasion of Ukraine have led to decreased volumes of cargo which has undermined competitiveness of the sector and contributed to a decline in business. These events also created an inflationary market environment which has furthermore impaired the ability of the sector to invest. This in turn has made it more difficult for transport companies to invest, including in greening their fleets. Therefore, investments into electric trucks are not the priority for a sector that is fighting for its survival and as the cost of electric heavy-duty vehicles is considerably higher than that of diesel trucks. For the private sector to have a viable business case for creating the necessary infrastructure as required by the AFIR targets, a sufficient number of electric heavy-duty vehicles that will use these public chargers is necessary. According to road operators, private charging infrastructure (at depots, logistic centres etc.) would be much more appreciated than publicly accessible charging pools, due to the expected lower costs of charging at those locations. At the same time, many Member States' budgets have become strained and there has been a need to refocus budgetary priorities more-and-more towards defence; supporting the uptake of HDVs from national budgets is therefore not a viable option in the current geopolitical conditions.

Additionally, the demand for charging infrastructure may also decrease in the coming decade. The completion of significant rail projects is expected to cause the demand for heavy-duty vehicles on major transport routes to decline further, decreasing the need for additional charging infrastructure. Concurrently, with Regulation 2024/1610 amending Regulation (EU) 2019/1242 as regards the CO₂ emission performance standards for new HDVs, the requirement was set that in 2040, the average CO₂ emissions of the Union fleet of new heavy-duty motor vehicles should be 90 % compared to the average CO₂ emissions of the reporting period of the year 2019. It might very well therefore prove unreasonable to prepare the infrastructure on such a large scale already at the current timeline as it may very well become obsolete by the time of a more wide-scale adoption of electric HDVs to reach all parts of the EU. Technological developments in electric HDVs offering higher ranges would also mean fewer charging stops and therefore again decreased need for charging infrastructure.

Barriers to charging infrastructure development

The timid market demand for HDV chargers has led to a correspondingly cautious approach from private investors regarding infrastructure development. Strict distance restrictions - such as 60 km on TEN-T core networks and 100 km on comprehensive networks - complicate matters further, particularly in relation to the existing electricity grid. There have been instances of HDV charging pool projects being cancelled due to high grid connection costs. In areas with low population densities, the necessary grid connections where the AFIR mandates are not accessible and may not become so in this decade as grid development priorities and investment capacity lay elsewhere, significantly complicate the development of the infrastructure required. Investment estimates indicate a significant gap to meeting the HDV infrastructure targets set for 2030, as stated in AFIR. And as referred before, national budgets may not be in a position to further assist as the required investments total in tens of millions. There are also examples of past wide-scale public investments into charging infrastructure being made too early and that in turn has created a backlash in the public opinion against electric vehicles.

Revision of targets is required

The Clean Corridor Initiative as started by the European Commission is a step in the right direction for cooperation in developing charging infrastructure and learning from best practices. However, in some Member States it will most likely be impossible to meet the AFIR requirements as set out for 2030 within the current economical and geopolitical environment.

The planned revision of AFIR occurring next year taking into account the very early market stage in some Member States should therefore achieve at least one of the three following points:

- **Extend the deadlines for meeting the targets by 5 years [or at least until 2035 where justified by market readiness and grid capacity];**
- **Ease the requirements planned for the current timeline across the board** to take into account actual market demand, electrical grid capacities and national budgetary constrictions in Member States and **allow lower minimum output power thresholds** for charging pools in areas with limited grid capacity to avoid unreasonable installation costs.
- **Ensure flexibilities and/or derogations** (including but not limited to) -
 - greater vicinity distance from the TEN-T network, where justified by technical or economic constraints;
 - flexibility of distance requirements between chargers so as to consider the existing electrical grid locations and avoid extremely costly greenfield investments;
 - flexibility in the power output of individual charging pools should be considered if there are objective energy constraints, such as insufficient grid capacity at specific locations, or if demand for charging is low due to the presence of private charging infrastructure at depots or logistic centres;
 - ensure the possibility for dual use of HDV chargers also for LDVs to ensure that infrastructure does not go unused in case of lack of demand from HDVs;

- o easing the requirements further for roads with annual average daily traffic of under 2 000 HDVs and introducing easing of requirements for roads with annual average daily traffic of under 3 000 HDVs to consider the market demand, population density etc.

Failing to do so could lead to costly investments that may not be utilised sufficiently to justify the expenditure. This situation poses a significant challenge, particularly given public scrutiny regarding budget implications and national defence requiring every available investment to ensure the security of the citizens and stability of the markets in the current political context.

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