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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Transport - Intermodal Questions and Networks
N° prev. doc.:	WK 1572/22
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Subject:	Fit for 55 Package - AFIR: Proposal for a Regulation on the deployment of alternative fuels infrastructure, and repealing Directive 2014/94/EU - Note from the Presidency - Comments from Hungary

Delegations will find in the annex, comments from Hungary on the subject mentioned above.

Comments by Hungary on the Presidency's note on AFIR

1. For the sections with low light vehicle traffic, do you agree to pursue the path outlined by the Slovenian Presidency? If not, which clarifications would you like to make or what alternative would you propose to respond to these specific cases?

In addition, do you consider it appropriate to provide for specific treatment for sections of the TENT with very low light vehicle traffic, which should therefore be limited to exceptional cases on a very small proportion of the TEN-T? If so, do you consider it appropriate to give the Member States concerned the possibility not only to reduce the power output required for these stations, but also to increase the distance between these stations? In this case, given the importance for all users of being able to circulate easily and of being well-informed (including those in transit), should specific information and supervision measures be provided (signalling and information for users, increased requirement for the proper operation of these stations, etc.)?

We agree that flexibilities should be included in the text to avoid the development of infrastructure that would require proportionally higher investments compared to its benefits. Thus we find the Slovenian presidency's approach preferable in this respect.

In case of sections of the TEN-T network with low traffic as we see, it would be more advantageous to reduce the overall performance of the pools then to reduce the minimal performance of the stations.

2. Do you support the approach suggested in this section (points a. and b.) regarding ad hoc payment? If not, which clarifications would you like to make or which alternative would you propose in order to address the challenges outlined?

With regard to the filling stations to be built, we agree with point (a) of the Presidency's discussion paper that we can support the provision on electronic payment instruments in paragraph 2 (a) and (b) of the draft AFI. With regard to the development of means of payment, we consider evaluation on the payment methods planned for 2026 important and to make a proposal for adjustment if needed.

We consider it important that the retrofitting of charging stations with a capacity of more than 50 kW not to adversely affect those who have already made significant efforts to build charging stations. It is important to consider reports and impact assessments on the construction and operation of charging stations in the Member States when making a decision. The retrofit requirement for existing service stations with a capacity of more than 50 kW requires significant investment. We find ad hoc payment fundamentally supportable in these cases.

Subject to legal feasibility, would you like to explore the possibility of an EU-wide obligation to open up recharging points to all mobility service providers that so wish? If so, what exactly should be, in your opinion, the respective obligations of the different stakeholders (charging point operators, mobility service providers, users)?

We do not support this proposal, nor is there such a practice for conventional fuel networks. This solution would distort competition because it would unilaterally benefit roaming platforms.

3.

Long-distance heavy-duty road transport:

- ***obliging Member States to study and pre-plan by 2025, if necessary according to differentiated scenarios, in good coordination with the Union's legal framework on the internal market for electricity, the reinforcement of the electricity grid along the TEN-T in order to have, before the end of the decade, the electrical power necessary for the decarbonisation of this segment,***

We agree that an assessment of the sufficiency of the electricity grid to enable the development of the recharging infrastructure should be carried out by Member States. This assessment should be included in the National Policy Frameworks.

- ***and providing for a review clause in the Regulation specific to this segment as early as 2025 to establish more detailed requirements for the TEN-T, taking full account of the technological developments expected in the short term and the first signs of market preferences?***

As the full Regulation is going to be reviewed by the end of 2026 and the National Policy Frameworks are going to be notified to the Commission by 1 January 2025 we don't see need to have a separate review by 2025.

For short-haul and regional heavy-duty road transport, given the availability of an increasingly mature technology whose total cost of ownership could very soon approach that of conventional engines and whose impact on air quality is major, what measures do you think are relevant in terms of electric charging infrastructure to accelerate its deployment?

In particular, in addition to private recharging at the depot, which should be used by the majority of short-haul and regional heavy-duty transport, publicly accessible recharging infrastructure can help trigger the process of electrification of this fleet of heavy-duty vehicles, and act as a catalyst, for example by pooling recharging points at night or by offering additional recharging during the day. Would you support the idea of obliging Member States to ensure the provision of a minimum publicly accessible recharging capacity for heavy-duty vehicles used for short-distance and regional transport?

Short-haul and regional heavy-duty road transport is a segment of transportation that is relatively easier to be decarbonized, is important to reduce greenhouse gas emission and to improve the air quality of our cities. On the other hand as stated by the Presidency this segment will probably use private charging during the night instead of public rechargers, thus we don't see the need for a separate obligation in AFIR in this respect.

Even if they do not fall within the scope of publicly accessible recharging and therefore within the scope of AFIR, which additional measures would support private recharging at the depot for short-distance and regional heavy transport?

As we see, the AFIR proposal includes the aspects that needs to be regulated on the EU level. The Member States have a wide variety of measures at their disposal to support the development of rechargers including tax incentives, low-emission zones etc.

It is important that Member States ensure that the electricity grid is ready to support the installation of high performance rechargers.