

Council of the European Union General Secretariat

Brussels, 24 February 2022

WK 2170/2022 ADD 9

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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
N° Cion doc.:	COM (2021) 559 final
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 by the Netherlands

Delegations will find in the annex, comments by the Netherlands on the subject mentioned above.

1. Publicly accessible recharging infrastructure for light vehicles (Article 3)

In order to avoid confusion, the Presidency wishes - at least at this stage - to examine separately the requirements for light vehicles and those for heavy-duty vehicles.

As regards the power output related to the size of the fleet of registered light vehicles (electric and plug-in hybrids), it does not seem to raise major difficulties in the light of the discussions and the explanations provided by the Commission on the reasoning used. In the long term, when the fleet of electric vehicles in service is significant, this objective will be the predominant one in terms of installed capacity.

As for the objective related to the coverage of the TEN-T, which is a sub-objective of the first objective referred to above, there seems to be broad support for the principle of ensuring that light electric vehicles can circulate easily throughout the Union as of 2025, in particular thanks to high-power recharging stations installed at regular intervals along the TEN-T. While several Member States mentioned that these targets for light vehicles are a minimum, others considered that, in some specific situations, uniform TEN-T coverage requirements would be excessive given the intensity of traffic in certain locations. In order to remove barriers to the use of light electric vehicles, the Presidency understands that it is important to provide users with excellent predictability with regular and homogeneous TEN-T coverage.

For TEN-T sections with low light vehicle traffic, the Slovenian Presidency has suggested the option of maintaining a distance of 60 km between stations on these sections, but where traffic is below a certain threshold and the infrastructure is not justified in socio-economic terms, it has proposed halving the required power output (one station can serve two directions of traffic with the power output normally required for one direction of traffic). The Commission would be informed of these exemptions. This option has the advantage of maintaining excellent predictability for users in terms of distance between stations (one station every 60 km) while facilitating the ramping up of supply when demand grows and/or the socio-economic analysis no longer justifies the exemption.

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?

- We welcome the distinction the Presidency has made between LDV and HDV as we believe heavy duty vehicles have very different market conditions and developments than light duty vehicles.
- As for the objective related to the coverage of the TEN-T: We are open for discussion to address the concerns of member states to be flexible in less dense areas of the network, though we think that the maximum distance should not be compromised. We support the use of traffic density, though the method and data source should be clearly defined. We think that the European Commission should be informed about the locations that fall under low light vehicle traffic. Next to this, a frequency to update this should be determined.
- We are also curious what other MS think of using the occupancy rate of recharging points to benchmark the minimum power output requirement.

In addition, do you consider it appropriate to provide for specific treatment for sections of the TEN-T with very low light vehicle traffic, which should therefore be limited to exceptional cases on a very small proportion of the TEN-T?

We are open for discussion to reduce the power output for stations on parts of the TEN-T network based on an objective traffic-density assessment. At the same time, we propose to raise the ambition for the minimum power output to 500 kW in 2025 and 1050 kW in 2030, which means that lower power output should be based on that baseline. We do need to prevent the risk that only a single recharging point per station leads the lack of redundancy in case the recharging point malfunctions. We also emphasize that the recharging point should be easily accessible from both sides of the road.

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?

We are <u>against</u> increasing the maximum distance between recharging pools. There is a serious concern in case for the Core/Comprehensive network different criteria are used, as the idea of these networks is that similar conditions can be expected. We would like to see an ambitious maximum distance (60km or less) along the TEN-T core network. When the distance becomes 100km and one of the stations does not function properly, EV drivers need to have spare battery capacity that is often around 50-70% of their range. This is unrealistic for proper accessibility of the TEN-T network for BEV drivers.

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 (signaling and information for users, increased requirement for the proper operation of these stations, etc.)?

Signposts are key for road safety in order for drivers to know where they have to be to recharge their vehicle. We are in favor of putting signposts along the road, as well as on the service/parking area. This is already the case for gasoline/diesel refueling, so this should not be different for recharging infrastructure.

2. User-friendliness of publicly accessible recharging infrastructure (Article 5)

In the light of the exchanges that have taken place so far, there seems to be a very broad desire to make electric recharging as easy as possible for users, while avoiding excessive additional costs when the benefits provided are low. In addition, Member States have expressed strong support for clear rules in order to avoid divergent interpretations and therefore different types of implementation in the Union: this would risk reducing the confidence of users and stakeholders.

With regard to <u>payment on an ad hoc basis</u>, the discussions showed that it seems appropriate to distinguish between recharging stations that will be installed as of the entry into force of the Regulation and those already in service.

a. For the stations that will be deployed as from the entry into force of the Regulation, it seems that the electronic payment instruments provided for in paragraphs 2 (a) and (b) of the Commission proposal are generally accepted (a payment card reader or a NFC contactless device able to read payment cards or, for stations of less than 50 kW, a dynamic QR code). Some consider it useful to clarify that an electronic payment instrument should be able to serve several charging points (as it is the case today for petrol pumps, in order to limit costs). The Presidency suggests clarifying this point.

It was pointed out that new means of payment could appear and others become obsolete in the coming years. However, it seems difficult to predict the exact timing of such developments at this stage. The instruments mentioned in paragraphs 2(a) and (b) seem to be the most commonly used today to allow for easy use, even by the least 'digitally connected' users. To address this concern, the Presidency suggests explicitly including in the 2026 review clause an evaluation by the Commission of the payment methods to ensure that they will still be relevant at that time and to propose adapting them if they are not.

b. For charging stations that are already in service, many Member States have highlighted the importance of limiting retrofitting for ad hoc payment to cases where it brings real added value so that operators and public authorities focus their efforts and investments on the deployment of new stations and so that this does not penalise stakeholders that have already made significant deployment efforts. Therefore, the Presidency suggests pursuing the path outlined by the Slovenian Presidency by making retrofitting mandatory by 2027 for stations of more than 50 kW, which are those that are intended to meet the TEN-T requirements: it is mainly for these stations that users in transit are the most likely to use the ad hoc payment option.

Do you support the approach suggested in this section (points a. and b.) regarding ad hoc payment?

Point a:

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We generally support the suggested approach in point (a). There should be an open approach defined in the article on the revision of the regulation, so that EV recharging stations can easily work with all new payment technology options across the EU in future. Ad-hoc payment solutions need to be flexible to offer different payment methods, so it is up to the operator to offer payment methods which fit in the EU rules for payment services (PSD2) and are suitable for the targeted customer group. We should keep mind, that the target is an easy and instant payment system without the need to subscribe and/or register.

We want to prevent cost-increasing technologies for payments. Therefore, we do not support to specifically describe terminals or card readers for normal recharging points, but we would like to keep web-based payments as an option. All recharging stations need to have internet, otherwise they cannot make transactions themselves, which would allow for internet-based payment solutions that allows consumers to pay with either a bank-card or bank-application. For high power recharging points, we could support including at least a payment card readers or devices that are able to read payment cards.

We are in favor of having a review of the payment systems included for 2026.

Point b

We generally support the suggested approach for point (b). The TEN-T network should have harmonized characteristics, but some time should be given to make the transition.

If not, which clarifications would you like to make or which alternative would you propose in order to address the challenges outlined?

We would like to see a better description of the payment options based no terminology described in the payment services directive (PSD2). We also would like to emphasize the necessity of harmonized cyber security requirements, as is presented in a report for our National Charging Infrastructure Agenda1.

As for <u>payment by contract linking the user to a mobility service provider</u>, this is now the largely dominant payment method. It provides benefits to users (ease of use, monthly payment, possible reductions in certain situations, access to an extended network of recharging points) and offers a basis for the development of energy services related to recharging (better optimisation of the charge and therefore of the electricity grid compared to ad hoc payment, better optimisation of the use of infrastructure and therefore of resources thanks to an extended accessto recharging points). However, it must be accompanied by safeguards (price transparency, including roaming).

Several Member States have expressed the wish to go beyond the Commission's proposal on this point. They suggest that operators of publicly accessible recharging points should be obliged to make their infrastructure 'open' to all mobility service providers that so wish. The aim is to give users access to a very large number of charging points through a single contract.

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)?

In principle we support the wide application of roaming as this is already the case in the Netherlands, though the current formulation to open recharging points to all MSP's is too strict. The obligation of ad hoc recharging and price transparency should already be sufficient to address wide access to consumers instead of obliging CPO's to open to all MSP's. We do see a risk that implementing this suggestion directly would lead to a situation where ad hoc recharging is no longer relevant (unless ad hoc prices are lower than subscription including roaming prices). This would require a strong legal text describing exclusion of certain contracts based on an objective justification. With the current formulation, we are not sure whether CPO's have to proactively deal with all MSP's or that they have to process requests from CPO's in a non-discriminatory way.

A CPO would need to ensure that every user can charge, ad hoc or optionally via a subscription. The CPO should have a clear non-discriminatory application process in place for MSP's to request a

¹ <u>https://www.agendalaadinfrastructuur.nl/ondersteuning+gemeenten/documenten+en+links/bibliotheek+-</u> +veiligheid+en+cybersecurity/default.aspx

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roaming agreement under reasonable and transparent conditions. MSP's have the responsibility to offer a reasonable and transparent roaming agreement to a CPO. Users should be able to at least recharge ad hoc with transparent en reasonable prices. Roaming via their main MSP should be optional and prices should also transparent and reasonable.

3. Heavy-duty vehicles (electric, hydrogen) (Articles 4 and 6)

Alongside light vehicles (cars, light commercial vehicles), which account for three quarters of CO2 emissions from road transport in the Union (about 15% of total EU emissions), heavy-duty vehicles account for about a quarter of CO2 emissions from road transport (5% of total EU emissions).

To achieve the EU's climate objectives for 2030 and beyond, each segment of the transport sector needs to accelerate its transition to low-carbon mobility.

The objectives that the Union has collectively set itself have already been translated into obligations for truck manufacturers. They are required, with potential financial penalties, to reduce the average emissions of the trucks they sell by 15% by 2025 and 30% by 2030. The Commission has announced that it will propose a tightening of CO2 emission standards by the end of 2022 to align them with the new 2030 Climate Target Plan. Some stakeholders, including truck manufacturers and NGOs, are insisting that sufficient adequate infrastructure be deployed in time. The challenge is to define what 'sufficient', 'adequate' and 'in time' mean in this case.

Unlike light vehicles, where there is a broadly shared vision of the evolution of the sector by a large majority of stakeholders because the technical solutions are evolving but becoming clearer and because the market exists, the transition of the heavy-duty fleet over the current decade and beyond is much more difficult to predict in detail and the sector is evolving rapidly. Furthermore, the level of development of the different technologies and the market for zero-emission trucks is not yet the same as for light vehicles.

The discussions held over the past few months have shown that while the objective of decarbonising heavy road transport is shared by Member States, many questions remain. They prevent a significant number of Member States from fully supporting the approach proposed by the Commission. This approach consists of prescribing the deployment of electric recharging stations and hydrogen refuelling stations on the TEN-T network by 2025, 2030 and beyond with precise specifications based on the knowledge of 2021.

The discussions revealed that there is still a high level of uncertainty on several important aspects. In particular, the following issues were raised:

- the capacity of the prescribed technologies to meet the expectations of the stakeholders (for example, what use case for heavy-duty recharging points with a power of 350 kW on the TEN-T? do they allow a 40t heavy-duty truck to gain, during a 45-minute break, enough autonomy to continue its activity? if not, what is their utility? in the event of the development of more powerful chargers, what are the implications for the electricity grid and for the reconfiguration of service areas?)
- the appropriateness of setting specifications now in areas where the performance of technological options and/or user preferences are not yet stabilised, with the risk of installing infrastructure that may prove to be under-utilised and constraining the industry with potentially sub-optimal regulatory choices in the long run (e.g., the distance between electric recharging stations for heavy-duty vehicles);
- the cost of this transition not only for users but also for the community as a whole (e.g. in terms of financial and human resources mobilised, including public resources, from planning to implementation; the risk of increasing the cost of the transition with stranded assets due to sub-optimal choices).

A large part of these uncertainties will most likely be resolved in the next few years thanks to the ongoing work of the industry and the dialogue they must have with their customers - road transport operators - and with stakeholders (public authorities, energy providers, road and electricity network managers) to find optimal solutions.

Way forward

Given the urgency, inaction is not an option. The public authorities certainly have an important role to play now.

Despite the questions that exist, the Presidency is of the opinion that the ambition must remain intact and continue to be that of a significant decarbonisation of heavy road transport by 2030. Despite its excellent environmental performance, biogas alone will not achieve this objective, given the increased demand induced by the Fit for 55 package and the relatively limited supply.

To ensure the success of the 2030 Climate Target Plan, Member States must act to ensure the smooth circulation of the different categories of zero-emission trucks throughout the Union.

The Presidency suggests adopting a 'bottom-up' approach, starting from the different needs of road transport operators and stakeholders and working out how to meet them in a coherent manner across the Union, rather than a 'top-down' approach organised in technological silos and based solely on current standards.

Thus, it is suggested that a distinction be made between long-distance heavy-duty transport on the one hand and short-distance and regional heavy-duty transport (from 50 to 400 km approximately) on the other. For these two segments of heavy-duty transport, the majority of vehicles used, the operating methods of road hauliers and the likelihood of optimal industry responses in the short term are different.

<u>For long-distance heavy-duty haulage</u>, the Commission's proposal does not seem to meet the operational expectations of this type of operation. These transport operations are carried out with vehicles of up to 40t with very specific operational needs. Chargers of 350 kW, the most powerful standard currently available, should allow such trucks to achieve 150 to 200 km of autonomy during the 45-minute legal break of the drivers, depending on the weight of their load. This would compromise the ability of these vehicles to continue their journey for 4.5 hours and would be a significant barrier for those transport undertakings that wish to have a flexible fleet adapted to the diversity of long-distance missions. In 2025, with the current 350 kW charging standard, battery-electric trucks do not seem likely to be able to compete with trucks powered by conventional engines for long-distance transport. The recharging points for heavy –duty vehicles installed on the TEN-T would therefore be little used for long-distance traffic at that time and would be abandoned by this traffic after the adoption of a charging method more suited to this market segment.

Indeed, developments are expected in the next few years. On the one hand, the future Megawatt Charging System (MCS) standard, which allows faster recharging, should be available in 2025, building on the experience gained in the electrification of battery-powered vehicles. On the other hand, the option of Electric Road Systems (ERS) seems promising in that it would make it possible to limit the size of batteries and the associated disadvantages (vehicle cost, increased weight, lower energy performance and demand for materials). Several Member States are experimenting with this solution and are considering equipping the busiest stretches of road, but tests are still needed to evaluate its advantages and disadvantages in real-life situations, and its deployment would require a coordinated approach. Finally, hydrogen would allow for very fast refuelling and long autonomy, but technological maturity has not yet been reached for heavy-duty transport, with the added need to ensure the development of renewable and low-carbon hydrogen.

Technological leaps appear necessary to allow the decarbonisation of long-distance heavy-duty transport. Ongoing work by industry suggests that such developments are possible by the middle of the decade.

According to the Presidency, this does not mean that the public authorities do not have to take action until then: all three technological options have in common that they require reinforcement of the electricity grid along the TEN-T road network. Indeed, even for hydrogen, the installation of dedicated electrolysers near the stations furthest from the production hubs could be of interest.

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Contrary to the Commission's proposal, which is silent on this point, it therefore seems wise to anticipate this reinforcement of the electricity grid without delay in order to be able to meet the 2030 objectives. In particular, the electricity grid operators point out that it is much less costly to anticipate and plan the reinforcement of this network, rather than proceeding by incremental changes.

<u>For short-haul and regional heavy-duty haulage</u>, the majority of road transport operators use vehicles with up to three axles. These short-distance and regional heavy-duty transport operations are very often organised on a daily basis. In addition, the market is beginning to offer and develop a range of battery-electric heavy-duty vehicles to meet this demand, with a sufficient range to meet the needs of a day's transport for such vehicles. Moreover, this type of vehicle is used extensively for journeys in city centres and suburban areas: beyond the challenges of reducing CO2 emissions, there is a strong interest in accelerating the use of such vehicles to achieve the objectives of improving air quality in cities.

Available studies show that for this type of transport, which is mainly organised during the day, recharging would take place mainly at night, at the depot, at a power of about 50 to 100 kW.

Unlike long-distance heavy-duty road transport, short-distance and regional heavy-duty road transport will not rely mainly on publicly accessible recharging infrastructure along the TEN-T road network. Under these conditions, the relevance of installing a network of 350 kW charging points on the TEN-T road network can be questioned.

For long-distance heavy-duty road transport, what do you think about the idea of

- 1. 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,
- 2. 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?

(1)

The Netherlands <u>strongly</u> oppose the deletion of HDV rollout targets for 2025. Electric trucks are already being deployed and all major Original equipment manufacturers have plans to mass-produce battery electric trucks before 2025, including long-haul trucks that could drive along the TEN-T corridor. Next to this, The Netherlands will already have more than 20 zero emission zones for logistics vehicles in its biggest cities. Based on experience with battery electric passenger vehicles, rollout of publicly accessible infrastructure is key to successful market uptake. We agree that the majority of HDV recharging sessions will be on private terrain (e.g. the depot), but not deploying a minimum amount of publicly accessible recharging would exclude certain user groups and increases the risk of empty batteries in the crucial ramp up phase of battery electric truck deployment.

We understand that the French Presidency discusses energy supply preparations, as we have addressed this topic as well during the Slovenian Presidency. The challenge for grid operators to support all aspects of the energy transition is growing. We agree that the expected growth in electricity and hydrogen including the required infrastructure along the TEN-T networks should include the required reinforcement of the energy networks in Member States. Collaborating with the national Transmission System Operators (TSO's), Distribution System Operators (DSO) and ENTSO-E to plan is accordingly is key. Mandating member states to study this and in particular preplan all grid upgrades under the AFIR framework for 2030 for hydrogen and electricity might not be the best location. Requesting MS to include grid operators to study this makes sense, but the final decision where scarce grid capacity is allocated to should be in their hands. We need to do more research to come with a more concrete position on this topic.

Furthermore, the energy grid should be planned an upgraded not only for electricity, but also for hydrogen supply. For a robust transport system, the autonomy of around 1000 km, as is common practice now, should be aimed for. Therefore the parallel development of both technologies is necessary. Probably a market for both technologies will develop, with both their own rationale for applications in each segment. Apart from electrolyzers, also hydrogen transport and distribution infrastructure (for instance via pipelines) can be applicable because of expected volumes and synergies with other sectors like industry. Also taking into account the role that hydrogen could play in heavy-duty transport, in early phases of the investment planning, could prevent public authorities and distribution system operators from high and unnecessary investments. Planning

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and investments in electrical infrastructure, including grids, and hydrogen infrastructure should be a balanced and integrated process. Taking into account developments and innovations in both technologies in a balanced and integrated approach under the assumption that hydrogen and batteries are complementary and both needed for robust and future proof energy and transport systems. CEF Synergy calls could provide in this this integrated approach.

(2)

We support the review clause for 2025 only if this it also includes minimum rollout targets for recharging infrastructure for 2025. It is not clear for us what is meant by "more detailed requirements". Not all technological developments are clear, but it is key to start deploying a minimum amount of infrastructure in order to ensure further market uptake of zero emission heavy duty vehicles by 2025 already. This could potentially hamper the effectiveness of the CO2 standards for heavy duty vehicles, for which the AFIR should be one of the main support instruments.

<u>For short-haul and regional heavy-duty road transport</u>, 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?

We see strong developments in favor of a positive TCO, but this will not happen without policy support. Various instruments could be applied:

- Investment support (subsidies or favorable loans) for grid upgrades (potentially combining grid upgrades of multiple companies in a commercial zone).
- CAPEX subsidies for recharging points.
- Maintaining part of the OPEX subsidies for recharging points (RED II and the RED III which is in development)
- Clear land development plans market rules (open and transparent procedures) for nationally-owned land and municipally-owned land where recharging pool's for HDVs can be developed.
- Development of a planning tool to see what infrastructure is already deployed, what space is available for recharging development.
- Streamlining of permitting processes for recharging infrastructure and in particular grid upgrades.
- Ensuring long-term interoperability by standardizing hardware, software and also various spatial aspects (e.g. minimum height, location of the recharging point relative to the vehicle etc.).
- Implementing zero emission zones for logistics
- Education programmes and publicity campaigns to train sufficient qualified personnel to install recharging infrastructure.

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?

In general we are supportive of this idea and we already have national plans to roll out a basic network of publicly accessible recharging points for HDVs, which originally focuses on recharging pool's around cities that have a zero emission zone from 2025 onwards.

We believe that within the AFIR this is already the case with the target to rollout recharging infrastructure in each urban node (though to a limited extent with the current list of Urban Nodes in the TEN-T regulation). Expanding the number of urban nodes per member state would benefit minimum rollout of much-needed recharging infrastructure.

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?

We are also interested in the provisions in the Energy Performance for Buildings Directive (EPBD) revision to also mandate minimum recharging infrastructure rollout in parking spaces for non-residential buildings. Next to this several measure mentioned at the start of the Short- and regional haul section:

- Investment support (subsidies or favorable loans) for grid upgrades (potentially combining grid upgrades of multiple companies in a commercial zone).
- CAPEX subsidies for recharging points.
- Maintaining part of the OPEX subsidies for recharging points (RED II and the RED III which is in development)
- Streamlining of permitting processes for recharging infrastructure and in particular grid upgrades.
- Ensuring long-term interoperability by standardizing hardware, software and also various spatial aspects (e.g. minimum height, location of the recharging point relative to the vehicle etc.).

<u>For these two heavy-duty segments</u>, which clarifications would you like to make or which alternative would you propose in order to address the challenges outlined?

How do you define short- or regional haul? To what extent could you make a clear distinction whether all short- and regional haul trucks will not use the recharging points along the TEN-T network?

4. Shore-side electricity supply in maritime ports (Article 9)

The exchanges on the provisions relating to the shore-side electricity supply in maritime ports have shown relatively broad support for the principle of these provisions.

The discussions have also made it possible to clarify a number of provisions, in particular concerning the involvement of port governing bodies, the definition of demand (in terms of number of calls), the different categories of ship and the calls that are not taken into account.

In the light of the reactions of the Member States, however, it seems that work is still needed on several aspects, especially

- A. The inclusion or otherwise of ships at anchorage within the scope of the demand that the ports have to meet needs to be clarified. Several Member States have expressed the wish to exclude ships at anchorage because there is currently no large-scale technical solution available for supplying electricity to ships at anchorage. The Commission has justified this inclusion by the desire to avoid encouraging vessels to remain at anchorage rather than at berth.
- B. The zero-emission technologies that vessels will actually be able to use should also be clarified. These technologies will exempt them from connecting to shore-side power and will exempt ports from meeting this demand.

These two aspects are closely connected to the Fuel EU Maritime negotiations. The issue of shore-side electricity supply in maritime ports is currently being discussed in the framework of the negotiations on the Fuel EU Maritime Regulation in the Working Party on Shipping.

These clarifications seem necessary before specifying, if necessary, within the framework of the negotiations on AFIR, the obligations that will be imposed on ports, particularly with regard to the number of calls for each category of ship and the percentage of response to demand.

Furthermore, independently of this work, it seems that the implementation of these provisions will require close coordination between the shipping companies on the one hand and the ports on the other, in order to enable the ports to anticipate the demand for electricity from ships.

Therefore, in your opinion, would it be appropriate to provide for an obligation for shipping companies to inform the ports at which they usually call? If so, at what point(s) in time would such information be relevant: at the time when ports are planning investments to determine the predicted evolution of their clients' fleet (notably as regards the development of zero-emission technologies on board)? Then, during the that context mandating this information works if the MSW is used.

operational phase, so that the companies can inform the ports of each call of their ship, and therefore of the expected demand for electricity?

We find the concept of sharing information appealing, though we are not sure whether mandating this is something we favor. We support the concept of transparent information exchange between shippers and ports in the planning phase. However, our preliminary assessment shows that mandating this requirement is not necessary. Ships could have diverse routes, where it's unclear who to send the information to. Next to this, port authorities that deploy OPS are likely to be in contact with shipping companies anyway. More assessment needs to be done. During the operational phase, we propose to add OPS requirements as information requirement to the "Maritime Single Window" for contact between the shipping company and the port authority. In

Concept