



Council of the European Union
General Secretariat

Brussels, 07 March 2023

**Interinstitutional files:
2021/0223 (COD)**

WK 2982/2023 ADD 1

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WORKING PAPER

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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Delegations
N° prev. doc.:	WK 2982/2023
N° Cion doc.:	COM (2021) 559 final
Subject:	Proposal for a Regulation on the deployment of alternative fuels infrastructure, and repealing Directive 2014/94/EU (AFIR) - Presidency non-paper on ways forward (articles 3, 4 and 5) - Comments of the Czech Republic

Delegations will find in the annex, written comments of the Czech Republic on the Presidency document WK 2982/2023.

Written comments of the Czech Republic on the Presidency document WK 2982/2023

The Czech Republic believes the General Approach is a good baseline for development of alternative fuels infrastructure. We understand that some concessions have to be done to reach a final compromise. The compromise below would keep the minimum standard across the EU, and at the same time, allow Member States to focus more on the technology, which could suit better their geographical or other conditions.

We are concerned that the last Presidency text deviates from the technology neutrality principle. The goals for eHDVs seems to be too high and very demanding in terms of funding. In the end, it could lead to insufficient resources to invest in any higher targets for hydrogen mobility. As a result, there will be gap between the level of development of e-mobility and hydrogen mobility. Proposed eHDV requirements could create a path dependency that would undermine development of the hydrogen as an alternative fuel for road transport.

In order to maintain the technological neutrality, the Czech Republic suggests a solution that would allow countries to decide in the NPF making process whether to give more emphasis to charging infrastructure for freight transport or to hydrogen mobility. This solution would give Member States room for manoeuvre in the preparation of the NPF to set lower target for recharging stations in terms of the power output of recharging pool and at the same time higher/more ambitious target for hydrogen stations in terms of distance between refuelling stations.

Article 4

Targets for electric recharging infrastructure dedicated to heavy-duty vehicles

a) by 31 December 2030, along the TEN-T core network, publicly accessible recharging pools dedicated to heavy-duty vehicles are deployed in each direction of travel with a maximum distance of 60 km in-between them and that each recharging pool offers a power output of at least ~~4200~~ 3500 kW and includes at least two recharging points with an individual power output of at least 350 kW. **Member States may decide to lower the power output of individual recharging pools up to 3 500 kW within their National Policy Framework, provided that they make commitment of more ambitious target for deployment of hydrogen refueling stations as set out in Article 6;**

Article 6

Targets for electric recharging infrastructure dedicated to heavy-duty vehicles

Member States shall ensure that, in their territory, a minimum number of publicly accessible hydrogen refuelling stations are put in place by 31 December 2030.

To that end Member States shall ensure that by 31 December 2030 publicly accessible hydrogen refuelling stations equipped with at least a 700 bars dispenser are deployed with a maximum distance of 200 km in-between them along the TEN-T core network.

Member States may set out more ambitious targets within their National Policy Framework and to lower these distances up to 170 km. When doing so they may decide also to lower the power output of individual recharging pools dedicated to heavy-duty vehicles up to 3 500 kW.