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## WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Transport - Intermodal Questions and Networks
N° prev. doc.:	ST 7592/22 REV2
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 - Revised Presidency compromise - Comments from Denmark

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



5th May 2022  
2021 - 169

## **Comments from Denmark – AFIR – Presidency Compromise (7592/2/22) REV 2**

Denmark would like to thank the French Presidency for the compromise text.

Denmark finds it of great importance that the level of ambition in the AFIR proposal is maintained.

Denmark finds that Presidency's compromise proposal points in the right direction as the proposal strives to maintain an ambitious approach and at the same time allows for a certain degree of flexibility to local conditions and low traffic.

### **Article 3 – targets for electric recharging infrastructure dedicated to light-duty vehicles**

#### *General remarks:*

In order to secure a dense user-friendly recharging network in the Union, Denmark generally supports the targets for maximum distances between publicly accessible charging stations for light-duty vehicles on the TEN-T network, power output requirements for the TEN-T-network as well as the timelines set out in the initial Commission proposal and Presidency Compromise (7592/2/22).

#### 1a: Fleet based targets

#### *Remarks:*

Denmark supports that the Regulation in an initial period of time comprises fleet based targets in order to ensure rollout of a sufficient publicly accessible power output in all Member States. However, Denmark finds that the fleet based targets should eventually be reduced (e.g. in connection with a future revision of the Regula-



tion in 2026) in line with the deployment of a Trans-European re-charging network and market development to prevent deployment of recharging facilities that may prove unnecessary.

Denmark could support a minimum percentage (e.g. 20 pct. light-duty battery electric vehicles of the total light-duty vehicle fleet) to be inserted in Article 3 1a in order to ensure a consistent approach.

It should, however, be a prerequisite that Member States can clearly demonstrate that further implementation will have adverse effects.

2a: Single recharging pool and capacity as for two directions of travel

*Remarks:*

Denmark accepts the flexibility suggested in 2a.

2b: Less than [10.000] light-duty vehicles - single re-charging pool for both directions of travel - capacity as for one direction

*Remarks:*

Denmark finds that the Presidency compromise in 2b takes local conditions into account appropriately and allows for a certain degree of flexibility as requested by Member States.

Denmark finds the threshold of 10.000 vehicles to be too high and would like to see traffic data to demonstrate that the proposed threshold of 10.000 vehicles will not significantly affect the general user-friendliness and coherence of a consistent future TEN-T re-charging network (i.e. what TEN-T-road sections are expected to trigger Article 3, 2b).



3, 2c: Less than [10.000] light-duty vehicles – single re-charging pool – one direction of travel – reduction of power output up to 50 pct.

*Remarks:*

In general, Denmark is opposed to lowering the kW power output by up to 50 pct., also in areas with low traffic density, as lowering the kW power output may compromise and reduce the userfriendliness and availability of the recharging network.

**Article 4 – targets for electric recharging infrastructure dedicated to heavy-duty vehicles**

*Remarks:*

Overall, Denmark favors the initial Commission proposal text on HDV-targets. Acknowledging, however, that Member States for various reasons are having challenges in reaching the proposed targets and in order to seek a viable compromise, which is still ambitious, Denmark can accept the flexibility set out in the Presidency Compromise Article 4, however with a minimum of 50 pct. deployment in 2025 and a minimum of 75 pct. deployment in 2027 on the way to fulfilment of targets in 2030:

- a01: by 31 December 2025, at least along ~~[0—50]~~ 50 pct. of the length of the TEN-T network, publicly accessible recharging pools dedicated to heavy-duty vehicles are deployed in each direction of travel and that each recharging pool offers a power output of at least 1.400 kW and includes at least one recharging point with an individual power output of at least 350 kW;
- a02: by 31 December 2027, at least along ~~[20—75]~~ 75 pct. of the length of the TEN-T network, publicly accessible recharging pools dedicated to heavy-duty vehicles are deployed in each direction of travel and that each recharging pool: [..]

With regard to 1c and 1d, Denmark can support the proposed flexibility, however with a number of HDVs of less than 800.

- 1c. By way of derogation from paragraph 1b, along TEN-T-roads with a total annual average daily traffic of less than



[~~800—2.000~~ 800] heavy-duty vehicle and where the infrastructure cannot be justified in socio-economic cost-benefit terms, Member States may provide that a publicly accessible recharging pool dedicated to heavy-duty vehicles may serve both directions of travel while meeting the requirements set out in paragraph 1 in terms of distance, total power output of single points applicable or a single direction of travel provided that the recharging pool is easily accessible from both directions of travel and that appropriate signposting is deployed.  
[..]

Denmark is generally opposed to lowering the power output by up to 50 pct., as suggested in Article 4, 1d, as a reduced power output may be compromising user-friendliness and availability.