



Council of the European Union
General Secretariat

Brussels, 10 May 2022

WK 6604/2022 ADD 2

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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 REV3
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 - Further revised Presidency compromise - Comments from Finland

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

Comments by Finland on the Presidency compromise text on AFIR in 7592/3/22 REV 3

(9 May 2022)

Finland reiterates its view that further distance based flexibilities to the Arts 3 and 4 are needed, as proposed by Sweden, Finland, Ireland, Estonia and Latvia in a joint written comment on the 12th of April 2022. In addition, Finland has delivered written comments on the 7 April 2022 on Delegates Portal which complement comments and proposals outlined in this document.

1. Targets for electric recharging infrastructure dedicated to heavy-duty vehicles (Article 4)

Our preliminary proposal:

Finland thanks for the Presidency for the tremendous work in capturing various components of AFIR proposal **in the Art 4.1a, Finland sees a need to simplify the calculation method to be easier to implement**. Our proposed approach would give the Member States more flexibility to meet the important target of year 2030 by using different national strategies and initiatives. For instance, one Member State could aim for a sparse and evenly distributed recharging infrastructure that results in the same coverage percentage as another Member State that plans a denser infrastructure to prioritized routes, assuming that the number of compliant recharging pools is the same. The reaching of the targets could be calculated by using the data as set out in the proposed Art 18.

If the proposed calculation method is being changed, **it may affect the discussion of the percentages (a01 and a02) as proposed for the target levels for years 2025 and 2027 in the Art 4.1**. Thus, this document also includes Finnish proposals for the a01 and a02 as defined in the Article 4.1 of the Presidency compromise (ST 7592/3/22 REV 3).

An example of the proposed method: there are **10 recharging pools** fulfilling the criteria of AFIR on the TEN-T core network. The length of the TEN-T core network is **2 460 kilometers**. To calculate the coverage of the length of the TEN-T core network, the number of the recharging pools should be multiplied by 60 kilometers (the minimum target for TEN-T core network in 2030 pursuant to proposed Art 4.1a). That results in 600 kilometers ($10 \times 60 = 600$).

The sum is divided by the length of the TEN-T core network ($600/2\,460 = 0.24$). As a result, the total coverage of the TEN-T core network would be **24%**. If two recharging pools on the TEN-T core network are located less than 60 kilometers from each other, to avoid double counting, the distance between them is only calculated once.

The similar calculation method is made for the TEN-T comprehensive network. However, each recharging pool would cover 100 km of the TEN-T comprehensive network (the minimum target for the TEN-T core network in 2030 pursuant to the proposed Art 4.1 b).

Changes compared to the document ST 7592/3/22 REV3 are highlighted in **bold and red** for additions and in ~~strikethrough~~ for deletions.

Targets for electric recharging infrastructure dedicated to heavy-duty vehicles (Article 4)

1. Member States shall ensure a minimum coverage of publicly accessible recharging points dedicated to heavy-duty vehicles in their territory. To that end, Member States shall ensure that:
 - (a01) by 31 December 2025, at least along [0 - 50] % 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 1400 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] % 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:
 - (i) along the TEN-T core network, offers a power output of at least 2800 kW and includes at least two recharging points with an individual power output of at least 350 kW
 - (ii) along the TEN-T comprehensive network, 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;
 - (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 3500 kW and includes at least two recharging points with an individual power output of at least 350 kW;
 - (b) by 31 December 2030, along the TEN-T comprehensive network, publicly accessible recharging pools dedicated to heavy-duty vehicles are deployed in each direction of travel with a maximum distance of 100 km in-between them and each recharging pool offers a power output of at least 1400 kW and includes at least one recharging point with an individual power output of at least 350 kW;
 - (c) by 31 December 2030, in each safe and secure parking area at least one **publicly accessible** recharging station dedicated to heavy-duty vehicles with a power output of at least 100 kW is installed;
 - (d) by 31 December 2025, in each urban node **or their vicinity** publicly accessible recharging points dedicated to heavy-duty vehicles providing an aggregated power output of at least 600 kW are deployed, provided by recharging stations with an individual power output of at least 150 kW;

- (e) by 31 December 2030, in each urban node or their vicinity publicly accessible recharging points dedicated to heavy-duty vehicles providing an aggregated power output of at least 1200 kW are deployed, provided by recharging stations with an individual power output of at least 150 kW.

1a. Each recharging pool that fulfills the requirements as set out in the paragraph 1 of this Article along the TEN-T core network shall correspond to 60 km of the coverage of the length of TEN-T core network. The coverage of the TEN-T core network is calculated by multiplying all the recharging pools fulfilling the power output requirements as set out in the paragraph 1 of this Article along the TEN-T core network by 60 km and then dividing the sum by the total length of TEN-T core network within the territory of the Member States.

Each recharging pool that fulfills the requirements as set out in the paragraph 1 of this Article along the TEN-T comprehensive network shall correspond to 100 km of the coverage of the length of TEN-T comprehensive network. The coverage of the TEN-T comprehensive network is calculated by multiplying all the recharging pools fulfilling the power output requirements as set out in the paragraph 1 of this Article along the TEN-T comprehensive network by 100 km and then dividing the sum by the total length of TEN-T comprehensive network within the territory of the Member States.

To avoid double counting, if the distance between two recharging pools along the TEN-T core network is less than 60 kilometres or along the TEN-T comprehensive network are less than 100 kilometres, the overlapping distance between two recharging pools shall be counted only once when calculating the total coverage of the length of TEN-T network.

To calculate the percentage of the length of TEN-T network covered referred to in points (a01) and (a02) of the paragraph 1, the coverage of the TEN-T core network and the TEN-T comprehensive network are added together and then the sum is divided by the total length of the TEN-T network within the territory of the Member States.

~~1a. The calculation of the percentage of the length of TEN-T network referred to in points (a01) and (a02) of paragraph 1, shall be based on the following elements:~~

- ~~(i) for the calculation of the denominator: the total length of the TEN-T network within the territory of the Member State;~~
- ~~(ii) for the calculation of the numerator: the cumulated length of the sections of the TEN-T network between two publicly accessible recharging pools dedicated to heavy-duty vehicles; sections of the TEN-T network between two recharging pools that are more than 120 km apart shall not be taken into account when calculating the numerator.~~

1b. A single publicly accessible recharging pool dedicated to heavy-duty vehicles may be deployed along TEN-T roads for both directions of travel provided that such pool is easily

accessible from both directions of travel, that appropriate signposting is deployed and that the requirements set out in paragraph 1 in terms of distance, total power output of the pool, number of points and power output of single points are complied with as for two directions of travel.

- 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] heavy-duty vehicles 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 the pool, number of points and power output of single points applicable for a single direction of travel provided that the recharging pool is easily accessible from both directions of travel and that appropriate signposting is deployed. Member States shall notify such exemptions to the Commission. They shall review them every [two] years in the framework of the national progress report referred to in Article 14.
- 1d. By way of derogation from paragraph 1, along TEN-T roads with a total annual average daily traffic of less than [800 - 2.000] heavy-duty vehicles and where the infrastructure cannot be justified in socio-economic cost-benefit terms, Member States may reduce up to 50% the total power output of a publicly accessible recharging pool dedicated to heavy-duty vehicles required pursuant to paragraph 1, provided that such recharging pool serves only one direction of travel and that the requirements set out in paragraph 1 in terms of distance, number of points and power output of single points are complied with. Member States shall notify such exemptions to the Commission. They shall review them every [two] years in the framework of the national progress report referred to in Article 14.
2. By 31 December 2030, neighbouring Member States shall ensure that the maximum distances referred to in points (a) and (b) of paragraph 1 are not exceeded for cross-border sections of the TEN-T core and the TEN-T comprehensive network. Before that date, attention shall be given to cross border sections and neighbouring Member States shall make all possible efforts to respect those maximum distances as soon as they deploy the recharging infrastructure along the cross border sections of the TEN-T network.

2. Our secondary proposal to the Article 4 para 1 a01 and a02 (ST 75292/3/22)

Finland sees a need for setting the EU-wide targets for the electric charging for heavy-duty vehicles. It is necessary to reach the EU wide climate targets.

The targets, however, should be reachable and take into account that the electrification of the heavy-duty vehicles is at the early phase. Typically the uptake of the growth of new technologies follows s-curve. In addition, according to the table 47 of the Impact Assessment of AFIR (Electricity recharging infrastructure costs), it is estimated that the development costs of the heavy-duty recharging pools will decrease.¹ Therefore, Finland sees it is justified to start with lower targets in

¹ COM(2021) 559 final, p. 129, source: Ricardo et al. (2021), Evaluation of the Directive on the Deployment of Alternative Fuels Infrastructure

2025, while expecting more rapid growth of the electric charging stations for heavy-duty at the end of this decade.

Therefore, Finland proposes the following percentages

Art 4.1 (a01, year 2025) = 20%

Art 4.1 (a02, year 2027) = 65%

Finland is happy to discuss the proposed target levels further. **However, if the target for year 2025 exceeds 42% or similarly for year 2027 exceeds 80%, it goes beyond what the Commission has originally proposed and is hard to be accepted.**

3. Targets for hydrogen refueling infrastructure of road vehicles (Article 6)

We thank the Presidency for the changes made in the compromise proposal, especially regarding taking out the requirements on comprehensive network. Finland sees the potential in hydrogen as an alternative fuel in the long run and can support the need for building the EU-wide infrastructure. Finland is geographically among the largest countries in the EU, but one of the most sparsely populated. In addition, the average daily traffic (AADT) and the average traffic density on the TEN-T road network are also one of the least in Europe. More specifically, Finland is one of the countries that carry the lowest volume of heavy-duty vehicles in Europe.² Hence, although Finland recognizes the importance of creating favorable conditions for the development of the hydrogen technology market, we strongly see **that minimum requirements should be reasonable and designed in a market-driven manner.**

Noting the reasoning and justification above and also acknowledging that hydrogen technology is not omnipresent yet, **Finland supports directing the minimum requirements only on the TEN-T core network. The proposal is very close to what we have proposed in December 2021.** Finland thanks the Presidency for recognizing it.

In terms of the distances, Finland would prefer the target of **200 kilometres.**

² CEDR Working Group Performance, Trans-European Road Network, TEN-T (Roads); 2019 Performance Report (2020).