

Consultation response

AmCham EU response to the AFID inception impact assessment

AmCham EU speaks for American companies committed to Europe on trade, investment and competitiveness issues. It aims to ensure a growth-orientated business and investment climate in Europe. AmCham EU facilitates the resolution of transatlantic issues that impact business and plays a role in creating better understanding of EU and US positions on business matters. Aggregate US investment in Europe totalled more than €2 trillion in 2018, directly supports more than 4.8 million jobs in Europe, and generates billions of euros annually in income, trade and research and development.

AmCham EU response to the AFID inception impact assessment

The American Chamber of Commerce to the EU (AmCham EU) supports the EU's ambition for low-emission mobility. The review of the Alternative Fuels Infrastructure Directive (AFID) as part of the Green Deal will be instrumental in meeting this goal.

AmCham EU recognises that the current level of deployment of alternative fuels infrastructure in the EU is uneven across Member States. Relying on a comprehensive impact assessment, targets in the revised AFID should be technology neutral and set based on a comprehensive, transparent and market-driven methodology. Such a methodology should be made public and consider key parameters such as technology, types of vehicles on the market, driver behaviour, access to public infrastructure. The Directive should ensure EU-wide infrastructure is available when and where needed and that administrative burdens are minimised. Interoperability will also be key to ensure a seamless user experience. This relies on proper market rules that ensure transparency for the user and avoid unnecessary costs.

The revision of AFID should be an opportunity to address the omissions in the current directive which are needed for the deployment of a proper alternative fuel recharging and refuelling network. This includes specific provisions for the heavy-duty sector that are considering technology developments.

Improvements in traditional transportation fuels, the internal combustion engine and many alternative technologies can contribute to reduce transport emissions and respond to different use cases. For example, hydrogen, derived from renewable electricity or natural gas, could be an important enabler to reduce emissions of the transport and power sectors. Fuel cell electric vehicles also allow rapid refuelling and long-range travel. Therefore, the revised AFID should equally look at the necessary infrastructure not only for electric vehicles (EVs), but also for all alternative fuels such as Liquefied Natural Gas, Compressed Natural Gas, low-carbon liquid fuels and hydrogen.

So far, political instruments for decarbonising road transport have mostly focused on vehicle emissions. However, achieving the desired results requires a comprehensive framework that focuses on market-based solutions and technological innovation in fuel, materials, vehicles as well as non-technical measures and behavioural changes. The essential role of infrastructure, be it transport, energy or digital, should not be overlooked. The revision of AFID should help address existing market barriers to support cost-effective investments. This includes infrastructure in the scope of AFID, but also further investment in digital and energy infrastructure to support the transition, including for example Intelligent Transport Systems or vehicle-to-X. Strong EU support to foster and accelerate infrastructure investment and incentivise innovation in digital technologies will not only improve transport's environmental footprint, but will also create smarter infrastructure.

Strong coordination of energy, digital and transport policies will be important to leverage the flexible energy demand potential of e-mobility and ultimately support the integration of more renewables into the grid. Proper implementation of the existing Electricity Market Design Regulation and Renewables Directive is crucial as well as a clear and commonly agreed definitions for smart charging and minimum requirements for transparent public tendering procedures. In the case of e-mobility, charging at home or in other private areas (i.e. workplace) will contribute considerably to the deployment of EVs. When setting the ambition under the revised AFID, the Commission should also consider private charging network deployment. The upcoming Renovation Wave could help to increase EU ambitions in the private sector by reinforcing the provisions in the current Energy Performance of Buildings Directive for private charging.