FEDERATION INTERNATIONALE DE L'AUTOMOBILE
REGION I - EUROPE, THE MIDDLE EAST AND AFRICA

FIA Region I policy position on the revision of the Alternative Fuels Infrastructure Regulation (AFIR)



Introduction

FIA Region I supports the objectives of the Alternative Fuels Infrastructure Regulation (AFIR) and welcomes the progress made in establishing a harmonised framework for the deployment of alternative fuels infrastructure across the European Union.

The Regulation has contributed to expanding the availability of public charging infrastructure, improving interoperability and introducing important consumer safeguards. However, the growing uptake of electric vehicles across Europe also highlights a number of persistent challenges affecting the everyday charging experience. Consumers increasingly expect charging services to function seamlessly across borders, with a consistent and user-friendly experience wherever they travel within the European Union.

From a consumer perspective, the success of AFIR should not be measured solely by the number of charging points installed, but by whether consumers can access charging services that are reliable, affordable, transparent and easy to use. FIA Region I therefore believes that the revision of AFIR should focus on strengthening the consumer dimension of the Regulation and ensuring that charging infrastructure effectively meets users' needs. The revision should also clarify how existing requirements concerning reasonable, comparable, transparent and non-discriminatory prices are to be applied and enforced in practice.

Improving price transparency and affordability

Transparent and understandable pricing remains one of the main challenges faced by electric vehicle users when accessing public charging services.

Despite existing AFIR requirements, consumers continue to encounter complex pricing structures, including combinations of energy-based tariffs, connection fees, time-based charges, subscription models and roaming tariffs. This complexity can make it difficult for consumers to compare offers and anticipate charging costs.

FIA Region I considers that charging prices should be presented in a clear, consistent and consumer-friendly manner throughout the European Union. Consumers should be able to understand the full cost of a charging session before charging begins and compare offers easily across providers.

The price per kilowatt-hour should be clearly displayed as the main reference price. Any additional price components, including time-based, session, service, parking or blocking fees, should be communicated clearly before the charging session begins. Consumers should also be able to distinguish between ad hoc, contract-based and roaming prices, including any applicable mark-ups or service fees.

Greater price transparency should be designed and monitored carefully to ensure that it strengthens competition and delivers tangible benefits for consumers.

At the same time, public charging must remain affordable. Particular attention should be paid to consumers who do not have access to home charging and who depend on public infrastructure for their daily mobility needs. These consumers often face higher charging costs and fewer charging options than those who can charge at home or at work. The transition to electric mobility should not create new inequalities between consumers with different charging opportunities. Competent authorities should monitor charging-market developments, including differences between ad hoc, contract-based and roaming prices. Price differences should remain proportionate, transparent and objectively justified, particularly where consumers have limited access to alternative charging services.

Strengthening reliability and consumer confidence

The availability of charging infrastructure is only one element of a successful charging ecosystem. The reliability of charging services is equally important.

Consumers continue to report issues relating to charger malfunctions, payment failures, inaccurate availability information and inconsistent charging performance. Such experiences can undermine confidence in electric mobility and discourage consumers from relying on public charging infrastructure.

FIA Region I therefore believes that greater emphasis should be placed on service quality and reliability. Publicly accessible charging infrastructure should provide accurate information on availability, operational status, charging power and pricing.

Essential charging information should be made available in open, standardised and machine-readable formats. For consumers, essential charging information should at least include the location, opening hours and access conditions of the charging point; its real-time availability and operational status; the maximum charging power and connector types; the full ad hoc price, including all applicable price components; the accepted payment methods; and the relevant accessibility features of the charging site. Independent service providers, including mobility clubs, should be able to access and use this information, including in real time, to develop consumer-facing navigation, comparison and charging services. Access to essential information should not be restricted to the applications or platforms operated by individual charging providers.

Reliability indicators should become a central measure of infrastructure performance alongside deployment targets. Such indicators could include charger uptime, successful charging sessions, maintenance response times and the availability of accurate real-time information.

Technical uptime should not be the only measure of reliability. A charger may be reported as operational even when authentication or payment fails, the connector does not work or the charging session cannot be completed. The rate of successful charging sessions should therefore be considered alongside technical uptime to reflect the actual experience of drivers.

Consumers should be able to trust that publicly accessible charging infrastructure will function as expected and provide a predictable charging experience throughout Europe.

The usability of charging infrastructure also depends on charging bays being available when needed. Member States should ensure that their national road and enforcement frameworks provide effective and proportionate measures against the abusive occupation or blocking of designated charging spaces.

Enhancing interoperability and consumer choice

One of AFIR's most important achievements has been the introduction of provisions supporting interoperability and ad hoc charging.

FIA Region I strongly supports the principle that consumers should be able to access publicly available charging services without unnecessary administrative, technical or contractual barriers. Charging should be straightforward regardless of the charging operator, mobility service provider or Member State involved.

Consumers should benefit from a broad choice of simple and widely accepted payment methods. These should include ad hoc payment, commonly used payment cards and appropriate digital payment options. The availability of these methods should be consistent for local consumers and consumers travelling in another Member State.

Consumers should not be required to download a specific application, register with a provider or enter into a subscription simply to use a publicly accessible charging point. Digital applications may offer additional convenience, but they should complement rather than replace accessible and familiar payment options.

Payment and interoperability requirements should provide an appropriate level of consumer choice across the public charging network, including at alternating-current charging points. As a substantial share of public charging takes place at lower-power points, consumers should not face significantly more limited access or payment options according to the charging technology used.

FIA Region I supports effective roaming across publicly accessible charging infrastructure, including alternating-current charging points. Charging point operators should provide fair and non discriminatory access to mobility service providers so that consumers can use their chosen provider across different networks. Greater roaming coverage should not, however, weaken consumers' right to ad hoc access or require consumers to enter into contractual arrangements.

FIA Region I also supports the development of interoperable solutions and emerging technologies such as Plug & Charge, provided they remain open, competitive and technology-neutral. The development of new charging solutions should not undermine the availability of ad hoc payment, interoperability between charging networks or consumers' ability to choose between different mobility service providers. Innovation should enhance consumer convenience without reducing consumer choice or creating closed ecosystems.

Plug & Charge solutions should not be restricted to a single mobility service provider chosen by a vehicle manufacturer or charging operator. Consumers should remain free to select and

change their preferred mobility service provider without facing avoidable technical or contractual barriers.

Differences between prices offered to ad hoc users, contract customers and customers of different mobility service providers should be transparent, proportionate and objectively justified. Vertically integrated operators should not be able to disadvantage independent mobility service providers or their customers through discriminatory wholesale or roaming conditions.

Ensuring accessibility and inclusion

The transition to electric mobility must be inclusive and accessible to all users.

While AFIR includes accessibility requirements, many consumers, particularly persons with disabilities and persons with reduced mobility, continue to encounter practical barriers when using charging infrastructure. These barriers may relate to charger design, cable handling, payment interfaces, physical access to charging bays or inadequate signage.

FIA Region I considers that accessibility should become a core criterion for assessing the quality of charging infrastructure. Accessibility requirements should be consistently implemented and effectively enforced across the European Union. Accessibility provisions should not only exist in legislation but also be consistently applied to newly deployed infrastructure and effectively monitored by national authorities.

Accessibility should be considered across the entire charging site, including the design and dimensions of charging bays, the positioning of screens and payment terminals, cable handling, surrounding surfaces, lighting and signage. Consumer access should not depend solely on whether the charging unit itself meets technical requirements.

Charging infrastructure should be designed so that all users can access charging services safely, independently and with dignity. A truly successful transition to electric mobility must ensure that no consumer is left behind.

Better integration of charging infrastructure and the electricity system

The continued rollout of electric mobility requires closer coordination between transport policy, energy policy and electricity network planning.

Grid constraints, lengthy connection procedures and insufficient coordination between infrastructure deployment and network development can delay investment and negatively affect consumers.

FIA Region I supports stronger integration between charging infrastructure deployment and electricity-system planning. This includes better coordination between public authorities, charging operators and network operators, as well as greater transparency regarding grid capacity and future infrastructure needs.

The development of smart charging solutions can contribute to a more efficient and resilient electricity system. However, consumers should remain at the centre of this transition. Participation in flexibility services should be transparent, easy to understand and designed to deliver tangible benefits to users.

Where dynamic or time-dependent prices are used, consumers should receive clear information on the applicable pricing mechanism before the session begins. The final invoice should provide an understandable breakdown of the energy delivered, the duration of the session, the different price components and the total amount charged. Consumers should not be exposed to unexpected price changes or service limitations without clear prior information.

Effective enforcement is essential across all these areas. National authorities should have the necessary powers and resources to monitor compliance, request relevant information, investigate consumer complaints and impose effective and proportionate sanctions where requirements relating to pricing, payment, interoperability, reliability, data access or accessibility are not respected.

Conclusion

FIA Region I believes that AFIR has established an important foundation for the deployment of alternative fuels infrastructure across Europe. As the market evolves, attention must increasingly shift from infrastructure quantity towards infrastructure quality.

Future improvements to the AFIR framework should focus on the following key priorities:

- improving price transparency and affordability;
- strengthening reliability and service quality;
- enhancing interoperability, payment choice, open data access and consumer choice;
- ensuring accessibility and inclusion;
- improving coordination between charging infrastructure and the electricity system;
- supporting effective competition and consistent enforcement across Member States.

By addressing these priorities, AFIR can better support a charging ecosystem that is not only extensive, but also transparent, reliable, affordable and accessible for all consumers.

This should enable consumers to travel with confidence both within their home country and across borders, benefiting from a consistent and user-friendly charging experience throughout the European Union.

The revision should ultimately establish practical and enforceable standards for pricing, payment, interoperability, reliability and data access, while preserving effective competition and allowing consumers to choose between different charging and mobility service providers.

FIA Region I



The FIA Region I, based in Brussels, is a consumer body comprising 102 Mobility Clubs that represent over 41 million members from across Europe, the Middle East and Africa. The FIA represents the interests of our members as motorists, riders, pedestrians and passengers. FIA Region I is working to ensure safe, affordable, clean and efficient mobility for all. Learn more at www.fiaregion1.com.