

Political Position on AFIR Review (EU) 2023/1804

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The Volkswagen Group has consistently been supportive of the EU's overall decarbonization goals. E-Mobility represents the core technology to drive forward the full decarbonization of road transport and defines the future of the sector.

The Alternative Fuels Infrastructure Regulation (AFIR) supports the increase of the crucial charging infrastructure in EU member states. According to the EAFO Consumer Monitor¹, lack of charging infrastructure is a remaining problem when travelling abroad with a Battery Electric Vehicle (BEV). The success of electromobility is therefore directly connected and dependent on effective AFIR regulation. The Data shows where infrastructure is lacking, the transition to e-mobility is slowed, undermining both consumer confidence and industrial investment. To safeguard the BEV ramp-up, it is essential that the AFIR evolves into a more robust and effective framework. The current AFIR has provided a baseline, but it does not sufficiently ensure that infrastructure expansion keeps pace with the future demand for e-mobility.

A key concern is that many Member States formally meet current AFIR requirements, yet the actual availability and accessibility of charging infrastructure remain insufficient to support widespread BEV adoption. This discrepancy between compliance and real-world adequacy is evidence that the regulation and its requirements must be strengthened. Only a stronger, more future-proof AFIR can guarantee that Europe's climate ambitions and industrial competitiveness are not jeopardized by infrastructure gaps. Art. 18 mentions what the Commission and Country are supposed to do when targets are not met. There is no real consequence for a member state when targets are not achieved, or compliance is delayed.

The regulation must move beyond formal compliance and deliver tangible, reliable charging networks that truly support the transition to sustainable mobility.

The Volkswagen Group has invested heavily in electromobility, including plants, workforce, and product portfolio. The focus of this document is our recommendation on the Review of the AFIR.

Key Recommendations

- 1. Need for a higher ambition level for mandatory targets**
- 2. Higher density of charging points (TEN-T and Urban)**
- 3. Pricing and Payment methods need to be feasible**
- 4. Extending scope to include non-public charging (Art. 14 EPBD)**
- 5. Foster Bi-Di charging**

¹ Current Consumer Monitor European Alternative Fuels Observatory EU Aggregated Report 2023, p.27

Recommendations in detail

1. Need for a higher Ambition Level for mandatory targets

While meeting or exceeding targets at a European level with the total number of public charging stations (over 161,000 in Q2 2025) and public charging capacity reached 32.2 GW, Europe is however still far from the European Commission's target of 3.5 million charging points by 2030. Most of the charging points are in only 5 Countries.

Charging Infrastructure always needs to be 2-3 years ahead of the Market. Thus, it is not enough to have sufficient Charging Points now. Being ahead of the Market will lead to trust and support from customers and society. The overall power installed in the charging points should be higher to raise consumer comfort and convenience.

Recommendation (Art. 3.1):

- The level of power needed for public charging needs to increase from 1,3kW to 3kW for BEVs (and from 0.8kW to 2kW for PHEVs).
- Adding a new concept due to the slow uptake in some countries: Introduce an additional new "minimum-kW-quota" per inhabitants for Member States to avoid the situation of a country with hardly any EVs fulfills AFIR requirements and has not to build up Charging Infrastructure.

2. Higher Density of Charging Points (TEN-T and Urban)

The actual mix of AC versus DC chargers reveals an under-representation of fast-charging (DC) stations, limiting convenience for long-distance and commercial users and in urban areas. The overall share of DC chargers in Europe is 18%, which is well below China (half) and the US (a quarter). Consumer surveys indicate a strong preference for faster charging speeds among both current and potential EV users in Europe, and the gap between infrastructure availability and user expectations could slow EV adoption.

The density of charging points remains highly uneven across countries and regions, highlighting persistent gaps in access. The AFIR target for public charging infrastructure capacity, calculated at the country level, does not account for regional disparities within individual countries.

Recommendation (Art. 3.4):

- Inclusion of a paragraph for Targets for High Power Charging in Cities
- The maximum distance along TEN-T core network should be changed from 60 km to 40 km with individual output of charging point at 350kW instead of 150kW.
- Accelerate the deployment of fast charging stations to meet consumer demand and align infrastructure with user expectations and mobility needs.
- Include a target of 300-500 public charging points per 100,000 inhabitants due to limited home charging access in cities.
- Address and reduce internal disparities in charging point density within countries to ensure equitable access across urban and rural areas.

3. Pricing & Payment methods need to be feasible

Public charging prices for electric vehicles in most countries significantly exceed the costs of private charging. To be able to charge publicly at a low cost under all circumstances, multiple charging contracts are required, which increases complexity.

High prices and complexity particularly affect customers who do not have access to home charging and are therefore dependent on public infrastructure. This complicates the transition to electric mobility and delays the ramp-up.

According to AFIR, charging prices charged by the operator of publicly accessible charging points (Charge Point Operator) must be "reasonable, easily, clearly comparable, transparent, and non-discriminatory" (Art. 5.3).

According to Art. 5, paragraph 5, the prices charged by the provider of charging services and cards, the so-called e-mobility service provider (EMP), to its customers must also be "reasonable, transparent, and non-discriminatory." Price information must be provided before the charging process, and the respective price components, including e-roaming charges, must be clearly distinguishable. To be attractive to customers, electromobility must offer a clear cost advantage overall. Reducing charging prices through increased competition and technology, as well as lowering ancillary electricity costs, is of key importance.

Recommendation (Art. 5):

- The aspect of price adequacy needs to be specified as in the Review (Art. 24.2(c))
- The CPOs' options for price differentiation should be limited (Art. 5 (3) and (5) AFIR). For example, charging point operators should not be allowed to differentiate between group-owned and non-group-owned MSPs. This requires a more specific definition of the price level differentiation described in Art. 5 (3) AFIR regarding "proportionate and objectively justified" (e.g., volume discounts).
- Only justified transaction costs (e.g., surcharge for credit card payment) may be included prices offered to MSPs in comparison to ad-hoc-charging prices.
- To implement these requirements, a European transparency body for charging prices is needed. CPOs should be required to report on their current prices.
- We oppose any kind of unnecessary parking/blocking fees. Parking/blocking fees should only serve to prevent the misuse of parking spaces by charging infrastructure or to ensure availability.
- Parking/blocking fees should only be charged after the charging process is completed.
- Parking/blocking fees should only be charged outside of the quiet hours. Charging parking/blocking fees during the quiet hours from 10 p.m. to 6 a.m. is unreasonable for users – at standard charging points in residential areas.

4. Extending scope of AFIR- to include non-public charging (Art. 14 EPBD)

The change from AFID (2014/94/EU) to AFIR (EU) 2023/1804 with mandatory targets was important to set the tone for the transformation towards E-Mobility.

While AFIR sets binding requirements for public charging, the EPBD (Article 14) addresses non-public charging in residential and workplace buildings. To ensure a coherent and comprehensive framework for the build-up of charging infrastructure, mandatory targets should also apply to EPBD Article 14 as well. This would secure the parallel growth of both public and private charging infrastructure, reduce pressure on public networks, and guarantee accessibility for consumers without private driveways. Integrating EPBD Article 14 into AFIR would therefore create a strong combination of public and non-public uptake, ensuring Europe's charging ecosystem is fit for mass e-mobility adoption.

The EPBD alone will not be sufficient to secure the necessary rollout of non-public charging infrastructure. Its implementation depends on national building codes, which vary widely and are often slow to adapt. Building regulations are complex, involving multiple stakeholders and lengthy permitting cycles, which frequently delay delivery. As a result, even where EPBD provisions exist, uptake remains fragmented and inconsistent across Member States.

Recommendation (to be added):

- Include Art. 14 of EPBD into the AFIR thus securing a strong combination of public and non-public uptake of charging infrastructure.

5. Foster Bi-Di charging

V2G charging capability of light-duty vehicles are increased modestly. The legal and economic structures for V2G in Europe are still being developed. Double taxation of stored electricity in non-stationary assets persists in many countries, - next to multiple additional economic hurdles through levies and fees making selling electricity back to the grid not economically sensible and acting as a barrier to grid flexibility.

Recommendation (to be added):

- Develop a supportive regulatory environment to enable vehicles to interact with the electricity grid in an interoperable manner and to incentivize the marketing of decentralized flexibilities on energy markets.
- Reform electricity taxation to eliminate double taxation of electricity storage, ensuring that stored electricity is not taxed twice to foster V2G development.