

# AFIR review: Heavy-Duty Vehicle Recharging

Building the logistics sector's evidence base for the public consultation on the review of AFIR. Your input will shape our joint submission on behalf of ALICE.

DATE <b>02 July 2026</b>	TIME <b>14:00–15:30 CET</b>	FORMAT <b>Online</b>	CALL FOR INPUT <b><a href="#">Have you Say page</a></b>
-----------------------------	--------------------------------	-------------------------	--

WHO'S IN THE ROOM <b>Grid operators · CPOs · eMSPs · Logistics providers</b>	WHAT WE PRODUCE <b>Evidence and Recommendations, supported by ALICE membership</b>	WHY IT MATTERS <b>Feeds directly into</b> the ALICE consultation response on AFIR
---	---	--

## 1 HDV targets & megawatt charging

AFIR Art. 4 · B.2 / G.2

*Do current power-output and distance requirements match real-world operations, and is infrastructure keeping pace with fleet demand?*

WHAT YOU ARE ASKED TO SUBMIT EVIDENCE ON

- Do you agree that the current mandatory AFIR targets for HDV electric recharging infrastructure are **insufficient** to ensure adequate and coherent coverage across the EU? Please explain.
- Are the current HDV recharging pool **power outputs and distances** (e.g. 60 km along the TEN-T core/comprehensive network, in safe and secure parking areas, in urban nodes) adequate for your real-world operations? Where do they fall short?
- Is the availability of **megawatt-level (high-power) recharging** at the locations you need it a constraint on your fleet electrification plans?
- Any further comments — including **quantified evidence** on where infrastructure is or is not keeping pace with your vehicle deployment.

## 2 Price transparency & reasonable prices

AFIR Art. 5 · D / G.5 / G.6 / G.7

*The user experience for HDV operators during payment at charge point operators (card payment) and via eMSP apps and cards.*

WHAT YOU ARE ASKED TO SUBMIT EVIDENCE ON

- Is there a **lack of price transparency** for prices charged by **charge point operators** when paying by debit/credit card?
- Is there a **lack of price transparency** for prices charged by **mobility service providers (MSPs)** via apps or MSP cards?
- Are prices charged by **charge point operators** (card payment) **not reasonable**? And those charged by **MSPs** (apps/MSP cards)?
- How does **pricing opacity or unpredictability** affect your route planning, TCO or willingness to electrify? Give concrete examples (unexpected fees, inability to compare prices in advance, ad hoc vs. contract pricing).

## 3 Standards, data access & depot charging data

AFIR Art. 20–21 · E / F.2 / G.8 / G.9

*Interoperability & compliance, access to infrastructure data, and whether private depot charging should be monitored.*

WHAT YOU ARE ASKED TO SUBMIT EVIDENCE ON

- Is compliance with AFIR technical specifications and standards **not adequately ensured** due to the absence of a compliance framework (certification scheme, common testing protocols)?
- Have you encountered **interoperability problems** in practice (connector, communication, plug-and-charge, payment) attributable to weak enforcement? Please describe.
- Is **access to data** (location, available power output, pricing) via National Access Points **not adequately ensured** for end users? Would better real-time data improve your planning?
- Is there a **lack of information on private/depot recharging** for HDV (where most sessions occur)? If new reporting were introduced, what burden would it create — and how could it be minimised?

## 4 Future policy priorities & open recommendations

- Are there any **other measures** that should be considered for revising the Regulation?



### Active participation requires a written contribution in advance

To take part as an active contributor, submit a short written contribution on **one** of the session topics above by **29 June 2026**. You can upload your contribution during registration.

**29 JUN**  
2026 DEADLINE

#### • Active contributor

Submit evidence by 29 June → join the discussion, shape the priorities, and have your input reflected in the submission.

#### ○ Observer

Unable to provide evidence before the deadline? You're welcome to register as an observer and will receive a full summary of outcomes and next steps.