

22 October 2020

**Peter ALTMAIER**, German Federal Minister for Economic Affairs and Energy  
**Andreas SCHEUER**, German Federal Minister of Transport and Digital Infrastructure  
**Ambassador Michael CLAUSS**, German Permanent Representative to the European Union  
**Frans TIMMERMANS**, Executive Vice-President for the European Green Deal  
**Adina VALEAN**, European Commissioner for Transport

**ChargeUp Europe calls for a harmonised future-proof EU regulatory framework for EV charging infrastructure**

Your excellencies, Ministers Peter Altmaier and Andreas Scheuer, Ambassador Michael Clauss, Executive Vice-President Frans Timmermans and European Commissioner Adina Valean,

We are writing to you on behalf of ChargeUp Europe, a newly formed industry alliance which represents the electric vehicle charging infrastructure industry, to stress the need for a harmonized EU approach to the EV infrastructure market which addresses existing and emerging fragmentation issues.

There is an urgent need to ensure that national policy and legislative developments do not create market fragmentation just as we look to build a coherent EU wide framework for EV infrastructure through the ongoing revision of the Alternative Fuels Infrastructure Directive (AFID).

From Charge Point Operators (CPOs) to eMobility Service Providers (eMSPs), electric charging equipment and vehicle (EV) manufacturers, IT experts and beyond, the EV sector is expected to play an important role in the EU's economic relaunch.

In this regard, we very much welcome the creation of the 'Recharge and Refuel' flagship initiative of the Next Generation EU Recovery financing plans. This will play an important role in the growth and development of the sector but needs to be supported and enabled through a coherent EU wide approach to the EV charging infrastructure market.

**The need for harmonisation**

In order to make this possible, a wide and swift revision of the market rules, in particular those laid down in AFID, is urgently needed to enable Europe's shift to a green and sustainable transport and energy sector.

The ongoing AFID revision is the opportunity to create a more harmonised EV infrastructure market which has the consumer at its core. Once in place this will enable the speedy roll out of EV infrastructure, boost investor confidence and ensure that the highest level of customer service and choice is delivered at the most competitive prices for EV drivers.

**Addressing fragmentation**

To date, we have noted that the existing AFID Directive has been poorly implemented in parts of the EU and that its legal basis has led to ineffective enforcement. This has resulted in varying and

inadequate EV charging coverage, diverging national market approaches, different technology specifications and local technical requirements.

From metering requirements and specifications on mechanical shutters to divergent approaches on opening concessions for charging along main traffic corridors, this fragmentation acts as a barrier to investment, undermines the connectivity of Europe, and threatens the growth of a key sector which will contribute to the EU's Green Deal and economic aims.

There are also emerging risks of further market fragmentation such as the ongoing revision of the German Ladesäulenverordnung (LSV) which regulates, amongst others, the technical minimum requirements for the operation of publicly accessible charging points such as authentication, use and payment options for ad-hoc charging.

Payment methods are constantly changing and, what may seem like a permanent fix today, could quickly become outdated tomorrow. From RFID cards to mobile apps and contactless payment options, EV charging stations already come equipped with solutions for site hosts to collect payments from EV drivers. Moreover, the EV market is already working and rolling out new ways to activate charging sessions and payments, like Plug & Charge whereby the vehicle initiates the session upon plugging in. Both the LSV and AFID revisions should ensure that EV charging stations are future-proof and keep an open approach towards payment technologies for ad hoc charging offered on publicly accessible charging stations.

**ChargeUp Europe calls on the German presidency of the EU and the European Commission to ensure we do not fragment the European market just as it is taking off.** Driving and charging an EV does not stop at a Member State's border, and therefore we need a common European policy framework rather than divergent national approaches.

Only a harmonised approach will ensure the necessary investment and scaling up of EV infrastructure which will play a key role in delivering on the aims of the EU Green Deal.

ChargeUp Europe is eager to work with the EU as well as with the German Presidency to ensure we create a vibrant internal market based on uniform standards to ensure a truly competitive market which benefits EV drivers.

Yours Sincerely,



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**ChargeUp Europe** is an industry alliance acting as the voice of the electric vehicle (EV) charging infrastructure industry. ChargeUp Europe has been formed to accelerate the switch to zero emission mobility and ensure that people can have a seamless driver experience with access to high quality, readily available charging infrastructure across Europe. The alliance brings together EV charging infrastructure sector players to work together to pursue the development and rollout of high-quality infrastructure throughout Europe. As of today, our member companies represent over 190.000 charging points in all 27 EU Member States.

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