

Brussels, 9<sup>th</sup> December 2022

Dear Ambassadors,

As two of the leading associations representing members in the hydrogen and automotive industry, Hydrogen Europe and ACEA would like to express their concerns on the current state of discussions over **Alternative Fuels Infrastructure Regulation (AFIR)**. We call on Member States to show the necessary **ambition for deployment of hydrogen refuelling stations** in AFIR and support the minimal national targets as set by the European Parliament to have:

- **One** hydrogen refuelling station **every 100 km** on both **TEN-T core and comprehensive networks**
- At least **one 700 bar dispenser on each** hydrogen refuelling station
- **One** hydrogen refuelling station for **liquid hydrogen every 400 km**
- At least **one** hydrogen refuelling station **in each urban node**
- Infrastructure on **core network** and in **urban nodes** to be in place **by 31 December 2027**

We are deeply concerned that by setting **insufficient ambitions**, in deployment targets for hydrogen refuelling and electricity recharging stations in road transport, **as proposed in the general approach of the Council of the EU**, the decarbonization targets set in the Clean and Sustainable Mobility Strategy and in the specific transport climate targets of the Fit for 55 package will not be achievable.

Recent announcements from several OEMs indicate that approximately **50,000 hydrogen-powered HDVs will be in operation in Europe by the end of the decade** if the framework conditions and the refuelling infrastructure are in place. The first series productions are announced as soon as in 2024. New models of passenger, light duty and heavy-duty vehicles, buses and coaches are being tested and rolled out, and **their sales are expected to grow in the coming years**. If flanking legislation is enacted as proposed, the operation of fossil fuel-powered commercial vehicles will be progressively disincentivized and discouraged. The demand for hydrogen in road transport and hydrogen refuelling stations is therefore imminent. With EU wide commitment for change and progress towards green and sustainable road transport, **there is no reason to fear stranded assets** when it comes to infrastructure for alternative fuels in road transport.

Ahead of the publication of the AFIR proposal in the Fit-for-55 package, ACEA published an interactive map which recommended setting an EU-wide minimum target of around 300 truck-suitable hydrogen refuelling stations by 2025, and at least 1,000 no later than 2030. With the current **targets in the Council position being set so low, these minimum demands for the rollout of hydrogen-powered heavy-duty vehicles (HDV) and other vehicle segments would not be achieved**. Hydrogen Europe estimates that **with the current Council position a maximum fleet of around 8.000 trucks would be able to be refuelled each day by 2030<sup>1</sup>**.

Most importantly, as proposed in the position of the EU Parliament, the stations should have a **mandatory daily capacity of 2 tons of hydrogen per day**, thus ensuring security of supply, which is one of the enabling conditions for the infrastructure to be operational. We would also like to highlight that **by not setting specific targets for hydrogen refuelling station in urban nodes** would effectively require owners and fleet operators of hydrogen fuelled vehicles to travel significant distances to hydrogen

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<sup>1</sup> Assuming a daily capacity of 2 tones on every HRS and a tank capacity of 60kg per HDV

refuelling station close to the TEN-T network, to refuel their vehicles. This will severely limit the market uptake of hydrogen-powered vehicles.

You should also be aware that **significant funding streams have already been made available** under different European and State aid frameworks. Among them, the **CEF-T/AFIF** is the primary tool to support the rollout of alternative fuels infrastructure with a total budget of **1.5 billion Euros** at your disposal, along with other instruments such as the Recovery and Resilience Facility (RRF) and the General Block Exemption Regulation. **All possible ways to speed up the deployment of hydrogen-powered transport should be exploited.**

Major industry events, such as the IAA Transportation and the **European Hydrogen Week**, have clearly shown that this industry is growing rapidly, and even though first movers are concentrated in only a few of the central European countries, other member states will follow suit. This **change towards zero emission mobility is obviously creating an enormous opportunity for EU and national economies to grow. The ambition set by industry stakeholders for a swift market uptake of hydrogen-powered vehicles, must now be matched with a similar ambition level to ensure the necessary hydrogen refuelling infrastructure becomes available.**

**We therefore call on you to enable and embrace the transition to zero-emission transport by setting equally ambitious AFIR targets.**

We remain at your disposal for any questions of further clarifications.