

IRU POSITION ON THE REVIEW OF THE AFIR FRAMEWORK FOR HEAVY-DUTY VEHICLES

Complementing the existing IRU position (AD/BR7882)

IRU position on the review of the EU Alternative Fuels Infrastructure Regulation

I. SUMMARY OF IRU POSITION

IRU welcomes the review of the EU Alternative Fuels Infrastructure Regulation (AFIR) as an important opportunity to strengthen the framework as a key enabler of decarbonising commercial road transport.

The next phase of AFIR should focus on ensuring that the regulation meets the operational needs of commercial road transport operators, particularly for heavy-duty vehicles (HDVs), including trucks, coaches and buses. As IRU already called for in its [existing position](#), beyond the number of recharging and refuelling points, infrastructure deployment must better reflect operational realities, including traffic flows and geographical coverage beyond the TEN-T network, and improve accessibility, reliability and price transparency.

Depot-based recharging and refuelling represent the cornerstone of the zero-emission HDV business model. It enables operators to cover most of their energy needs, optimise their total cost of ownership (TCO), and reduce dependence on public networks, which are still far from meeting the required scale.

In addition, recognising the option for owners of depots and operators' destination sites to voluntarily share their infrastructure with third parties, through a "semi-private" framework, would bring several benefits: extend infrastructure coverage, raise utilisation rates, and deliver competitively priced energy for operators.

For these reasons, alongside continued efforts to deploy public infrastructure across the EU, the AFIR review should complement the framework through dedicated measures on recharging and refuelling points within strategic sites for transport operations. IRU calls for:

- **Developing an enabling framework for depot-based recharging and refuelling**

IRU call: The reviewed AFIR should require Member States to establish an enabling framework that effectively supports the deployment of recharging and refuelling infrastructure at operators' depots. Key enabling measures include faster permitting procedures and accelerated grid connections, one-stop shops for commercial operators, and better integration into national energy and infrastructure planning.

Reasoning: This addition would recognise that the charging ecosystem for HDVs consists of publicly accessible infrastructure alongside private and semi-private infrastructure. At scale, road transport decarbonisation is expected to rely on a mixed charging model, with a significant part of energy needs covered at depots and accessible operators' destinations. Realising that potential depends on removing the permitting, grid connection and planning barriers that currently delay depot infrastructure projects.

- **Introducing an EU-level definition of “semi-private” infrastructure and enabling access to dedicated support**

IRU call: The AFIR review should introduce a definition of “semi-private” infrastructure for recharging and refuelling points owned by commercial operators and site owners who voluntarily make them accessible to external users. These include operators’ depots and destinations, such as shippers’ warehouses, passenger terminals, and loading and unloading points. The definition should include common EU-level criteria on power and accessibility, and obligations proportionate to the specific nature of semi-private infrastructure, distinct from those applying to public networks.

The “semi-private” category should also be reflected in the relevant state aid rules in the EU General Block Exemption Regulation (GBER), ensuring that sharing a private site infrastructure with third parties does not trigger the full procedural requirements applicable to public infrastructure, and that national support programmes for semi-private infrastructure can be assessed under simplified conditions. In parallel, the eligibility conditions of EU funding instruments should be adapted to cover semi-private infrastructure, which is currently excluded, as the Alternative Fuels Infrastructure Facility (AFIF) is open only to publicly accessible projects.

Provided they meet common accessibility criteria and site owners regularly report on their use, semi-private recharging and refuelling points should count towards specific AFIR targets, such as those for urban nodes, facilitating Member States’ compliance while complementing rather than substituting for public infrastructure deployment, which remains essential, particularly for high-power charging.

Reasoning: Today, a site owner considering opening capacity to third parties faces a step change in regulatory and procedural requirements, which discourages sharing and leaves existing capacity underused. Recognising the category would address this and generate several further benefits. First, it would enhance the business case for investment in alternative fuels infrastructure by creating additional utilisation opportunities and revenue streams for site owners. Second, it would enable EU funding instruments such as AFIF to support these arrangements, accelerating the roll-out of charging infrastructure close to the operators’ needs. Third, it would support the achievement of AFIR deployment targets by allowing semi-private infrastructure accessible to external users to be counted towards Member States’ network coverage.

II. ANALYSIS

1. AFIR review process

[Regulation \(EU\) 2023/1804](#) on the deployment of AFIR provides the EU framework for the roll-out of publicly accessible recharging and refuelling infrastructure. Under Article 24(2), the European Commission (EC) must review the regulation by 31 December 2026 and every five years thereafter to assess its implementation and effectiveness.

As part of this process, the EC launched a Call for Evidence in March 2026 to support its impact assessment, to which IRU submitted [input](#) based on its earlier [position](#). In May 2026, the EC opened a public consultation on potential areas for improvement of the regulation. For HDVs, including trucks, coaches and buses, the consultation stresses the need for infrastructure where it is operationally relevant: along long-distance corridors, in urban nodes, at logistics hubs, and for overnight charging. IRU responded to the consultation through the questionnaire.

While stressing the importance of maintaining support for hydrogen refuelling infrastructure, in line with a technology-neutral approach, IRU [welcomed](#) the EC's confirmed efforts to improve AFIR as a key tool to accelerate the roll-out of recharging infrastructure for electric HDVs, as outlined in the [Electrification Action Plan](#) adopted in July 2026.

2. An enabling framework for depot-based recharging and refuelling

IRU notes that the regulation currently focuses on public recharging and refuelling points, except for generic provisions requiring Member States to encourage deployment of private charging points through national measures (Article 14) and include both public and private points in their national reporting (Article 15).

Depot-based recharging and refuelling will play a crucial role in the decarbonisation of heavy-duty fleets in line with operational realities, including trucks, coaches and buses. This is linked to the several advantages that depot infrastructure provides operators by allowing them to:

- Cover the majority of HDVs' charging needs, including where lower-power charging is sufficient for vehicles parked for longer periods,
- Gain greater control over charging schedules and infrastructure, and
- Optimise charging around vehicle operations and electricity prices, achieving significant cost savings.

AFIR should fully recognise this reality and more concretely support the deployment of depot-based infrastructure. To do so, the review should require Member States to establish an effective framework that supports the roll-out of recharging and refuelling points at operators' depots through relevant enabling measures, such as:

- Introducing maximum time limits for permitting and for grid connection, or other facilitation measures,
- Setting up one-stop shops for commercial fleet charging projects,
- Including depot charging in national infrastructure and energy planning, and
- Facilitating long-term agreements between commercial road transport operators, electricity network operators and energy suppliers, providing greater certainty on grid connection, available charging capacity and predictable electricity supply conditions for depot charging investments.

The provisions on depot infrastructure should not include numerical targets or deployment obligations on depot owners. Rather, their purpose should be to incentivise Member States to remove barriers to deploying depot-based recharging and refuelling points and provide commercial operators with greater clarity and certainty for investment.

3. Definition of “semi-private” infrastructure and access to dedicated support

The voluntary opening of strategic transport sites, including both depot and operators' destinations, to third-party users would provide additional benefits, namely:

- Rapidly contribute to the development of a complementary charging network for zero-emission HDVs away from their home base,
- Enhance the business case for investment in recharging infrastructure by increasing utilisation opportunities and creating new revenue streams, and
- Provide access to competitively priced recharging and refuelling for transport operators, which is essential to achieving a lower TCO.

a) Definition, common criteria and obligations

For these reasons, IRU sees strong benefits in introducing an EU-level definition of “semi-private” infrastructure in AFIR. Such a definition would cover recharging and refuelling points owned by private operators and site owners who voluntarily make them accessible to external users. These include operators' depots and their destinations,

such as shippers' warehouses, passenger terminals, and loading and unloading points. Site owners must remain completely free to decide whether to open their infrastructure to external users, and the framework should create positive incentives for them to do so.

The definition of semi-private infrastructure should include common EU-level criteria, and obligations proportionate to the specific nature of semi-private infrastructure and distinct from those applying to fully public networks. The accessibility criteria should ensure a consistent understanding across Member States by covering:

- The terms on which third-party users are granted access (which should be transparent and non-discriminatory among comparable users), and
- A minimum level of availability to external users, defined in a way that respects the operational constraints of the site.

Access to semi-private infrastructure should be arranged in advance through registration, contract or booking, rather than provided on a walk-up basis. This would distinguish it from publicly accessible infrastructure and justify a different set of obligations.

The framework should also specify clearly which AFIR obligations apply to semi-private infrastructure. Requirements designed for spontaneous public use, such as ad hoc payment at the point of use and real-time availability reporting, are not adapted to infrastructure accessed through prior arrangement. Conversely, transparency of access conditions and prices, and non-discrimination among third-party users, are appropriate and should apply. The framework should also clarify how these obligations are allocated between the site owner and the charging point operator, where these are different entities, to avoid legal uncertainty for both.

A harmonised EU framework is essential in this respect. Without common criteria and obligations, Member States will apply divergent rules to the same physical set-up, creating legal uncertainty and additional administrative burden for operators active in several markets, and discouraging the voluntary opening of transport sites.

b) Alignment with state aid rules

The semi-private category should also be reflected in the relevant state aid rules in the GBER, which is currently under revision, with the new text expected to be adopted by the end of 2026. Under Article 36a(10), aid for publicly accessible recharging and refuelling infrastructure requires an ex-ante open consultation or an independent market study, while infrastructure that is not accessible to the public is exempt. This binary trigger means that a site owner who voluntarily opens capacity to third parties risks moving from full exemption to the complete procedural regime designed for commercial public stations, which would be a strong disincentive to sharing.

The updated GBER should therefore ensure that sharing infrastructure within a depot or another transport site with third parties does not trigger those requirements in full. National support programmes for semi-private infrastructure should accordingly be assessed under simplified conditions, reflecting a co-funding model in which the site owner covers the larger share and the resulting aid intensity, and therefore the potential for distortion, is correspondingly lower.

c) Funding eligibility and contribution to AFIR targets

In parallel, the eligibility conditions of EU funding instruments should be adapted to cover semi-private infrastructure, which is currently excluded as AFIF is open only to publicly accessible projects.

Provided they meet the above-mentioned criteria and clear reporting requirements, semi-private charging points should be allowed to count towards specific AFIR targets, such as those for urban nodes. To ensure national authorities have the visibility needed to account for this capacity reliably, site owners could be mandated to report annually to authorities on the use of their semi-private infrastructure. This would facilitate Member States' compliance while complementing rather than substituting for public infrastructure deployment.

4. Conclusions

Overall, supporting the deployment of private and semi-private recharging and refuelling infrastructure within operators' depots and their destinations would represent a pragmatic and cost-effective measure to increase charging availability, improve infrastructure utilisation, and support the transition towards zero-emission road transport.

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