Non-paper by the Netherlands on the AFIR review

Introduction
The Netherlands strongly welcomes the review of the Alternative Fuels Infrastructure Regulation (AFIR). As a frontrunner in the transition to clean mobility, the Netherlands is firmly committed to the decarbonisation of transport and considers a robust, interoperable alternative fuels infrastructure network indispensable to achieving this goal.

The Netherlands has translated its AFIR obligations into concrete policy measures, backed by dedicated resources. These measures have been consolidated in our National Policy Framework (NPF) for alternative fuels infrastructure. Combined with market-driven development and local and regional initiatives, this approach has put the Netherlands firmly on track to meet its targets for light-duty and heavy-duty vehicle charging, hydrogen refuelling, and shore-side electricity supply. AFIR has proven its value as a regulatory instrument, providing direction and investment certainty to operators and public authorities alike.

Charging, hydrogen refuelling and on-shore power supply targets
The Netherlands regards the quantitative targets as a minimum baseline for both LDV and HDV charging, hydrogen refuelling, electricity supply to stationary aircrafts and on-shore power supply (OPS). This foundational network enables market-driven expansion to take over from that point. Maintaining the existing targets and the timeframes is essential: it provides both regulatory stability and investment certainty. This infrastructure forms the backbone of the transition to clean mobility and has been successful at breaking the demand-supply deadlock.

Targeted and limited flexibilities may be considered, but only where disproportionate costs or genuine technical constraints can be demonstrated. Relevant considerations include locally constrained grid capacity and exceptionally low traffic volumes. The Netherlands experiences that grid capacity is increasingly becoming a decisive factor for the deployment of alternative fuels infrastructure. While grid congestion can be a hurdle, we also note that solutions for grid congestion and emission free transport go hand-in-hand, such as charging stations combined with stationary batteries and the smart and bi-directional charging of vehicles.

Price transparency and ad hoc charging
The Netherlands considers the current price transparency for the different alternative fuels and modalities and – where appropriate – ad hoc charging provisions insufficiently specific to be effective and calls for greater regulatory precision. The Netherlands proposes the following specifications to better inform end users and give the sector greater clarity on what is required:

- Operators and service providers must proactively communicate session-specific pricing to the end user prior to the start of a charging session. More specifically, ad hoc charging prices should be displayed at every newly installed publicly accessible charging station.
- Mobility service providers must include the applicable ad hoc price in their pricing information for each session. The ad hoc price should serve as the reference price throughout the value chain. This allows the end user to verify whether service providers apply a market-based margin.
- Pricing at stations with an output below 50 kW should be limited to a maximum of two components: a kWh-based element as the primary unit, and an optional time-based component, provided the latter does not undermine smart charging schemes.
- As dynamic pricing becomes more prevalent, a clear principle should be established: prices may only change mid-session if the revised price was explicitly communicated to the user before the session commenced.
- The obligation on operators to ensure safe ad hoc payment at stations below 50 kW should be strengthened. Article 5.1 should be amended to encompass the full payment journey, including QR code provision and all steps leading to the transaction. This should be done by replacing ‘safe payment transaction’ with ‘safe payment process’.

With regards to hydrogen refuelling we call for a minor broadening of the price components for ad hoc refuelling in article 7.3. By also allowing a price per energy unit, we bring AFIR in line with the Measuring Instruments Directive, specifically (EC) 2026/706.

IDRO function and registration
The Netherlands considers ID Registration Organisations (IDROs) a key instrument for enabling e-roaming and supporting broader market functions. To strengthen their EU-wide effectiveness, the Netherlands calls for greater consistency and clarity in IDRO functionality and operations and for a strengthened governance of the ID Registration Repository (IDRR). The harmonised functioning of national IDROs should be aligned with the ID and Data Collection for Sustainable Fuels in Europe (IDACS) and IDRR frameworks. Establishing an unambiguous registration obligation for all relevant market actors is of equal importance.

Interoperability
AFIR has been a driving force for interoperability across the sector and has been instrumental in delivering a seamless user experience to EU citizens and businesses. As the Netherlands faces increasing grid congestion, we urgently call for an acceleration of standardisation requests and for the mandating of standards that enable integration between the electromobility and energy domains. Making specific versions of the widely adopted market protocols EN-IEC 63584 (OCPP) and OCPI mandatory would accelerate this integration and unlock the flexibility that the energy system urgently requires.

While interoperability has been one of AFIR's key strengths, the Netherlands calls for the introduction of a complementary principle: transferability. In practice, interoperability alone cannot always guarantee the efficient handover of infrastructure between owners, operators or users. To future-proof the Annex II technical requirements, a transferability principle should be introduced. This principle requires that stations must be designed and configured in a way that allows a change of operator, service provider, or end user without physical intervention - enabling remote reconfiguration, migration, and reassignment of ownership.

Simplification and definitions
The Netherlands considers Article 19.3, which concerns price comparisons at refuelling stations, to be ineffective in its current form. While the underlying objective has merit, information should be delivered more efficiently and kept up-to-date through digital channels and at alternative touchpoints.

Additionally, the Netherlands calls for a clear and harmonised definition of 'publicly accessible infrastructure'. This definition should provide legal certainty for all stakeholders and ensures consistent interpretation across Member States. Given the Netherlands' extensive existing network and the AFIR requirements linked to renovations, clarity is equally needed on what constitutes a renovation of infrastructure installations. Such a definition should make clear that, beyond full replacements, only maintenance work that increases or improves functionality may qualify as a renovation.

Heavy-duty vehicles (HDV)
The AFIR facilitates the uptake of Zero-Emission Heavy Duty Vehicles (ZE-HDVs) and stimulates the demand for ZE-HDVs and thereby helps manufacturers to meet their CO2-HDV standards. Especially battery-electric heavy-duty vehicles (HDVs) are developing rapidly and are becoming increasingly economically competitive with regard to diesel HDVs. This requires:

- Ambitious AFIR-HDV targets to be set in line with existing CO2-reduction targets for HDVs.
- Flexibility could be allowed for regions with low transport volumes.
- AFIR-HDV targets for special HDV vehicle categories like coaches, construction vehicles and trailer refrigeration units. A comprehensive stocktaking is needed to ascertain whether current HDV charging locations have the required facilities (such as toilets, restaurants/cafes, secure and comfortable parking spaces) for coach drivers and passengers alike.

Aviation
The Commission has requested stakeholders to reflect on the lack of mandatory targets for alternative fuels infrastructure for propulsion fuels. The Netherlands has the ambition that all flights up to 500 km are zero-emission by 2050. To achieve this, charging infrastructure will be required in multiple Member States. To support that development specific targets are desirable. This however requires careful analysis and dialogue with Member States and the relevant industries to ensure targets are in line with market development.

Maritime
The Netherlands views the current quantitative targets for on-shore power supply (OPS) as a minimum baseline. We would like to put forward the following points for evaluating the maritime articles:

- Concerning seagoing shipping (art. 9), the OPS obligation is limited to seagoing container and passenger vessels above 5000 GT. The Netherlands has received market signals that there is a demand to include other segments, such as lower GT classes (up to 400 GT), all roro vessels, offshore, shipbuilding and liquid bulk. The Netherlands supports this vision and art 24.2d provides a solid basis. When technology for a segment is not fully mature yet, supporting demonstration projects or adopting a range in timeframes could be considered.
- Further inclusion of segments should be in line with complementary broadening of the scope in FuelEU Maritime.
- As for inland ports and waterways, the Netherlands notes that obligations are defined less extensive than in seaports. Exploring further specification of the OPS requirement would be a helpful step to further incentivize the application in inland shipping.
- To stimulate multifunctional use of OPS installations (particularly for charging) consideration should be given to revisiting OPS standards and incorporating new standards for battery charging infrastructure in the regulation.
- Additionally, as for other alternative fuels infrastructure (particularly dedicated charging infrastructure), the value of increased obligations in ports should be assessed, and best available projections of upcoming demand for alternative fuels, such as bio-fuels and e-fuels from the shipping sector should be taken into account.
- Finally, we point out that with electrification of port areas ongoing, getting new connections to a congested electricity grid proves a serious hurdle for the installation of OPS in some areas in Dutch ports. On-site production of electricity should therefore be facilitated.

Reducing reporting obligations and enhance capacity building
The Netherlands notes that the current AFIR monitoring and reporting obligations for member states are labour-intensive and overlap to some degree with requirements under other EU legislation, most notably ReFuelEU Aviation and TEN-T. The revision presents an opportunity to streamline these requirements and reduce the administrative burden, in line with the Commission's simplification agenda. The Netherlands invites the Commission to conduct a systematic mapping of overlapping obligations across AFIR, ReFuelEU and other relevant instruments.

In line with other initiatives, such as the proposal for permitting[1] and grids, it is important that member states have sufficient capacity and expertise to support the obligations emanating from AFIR and other EU legislation.

[1] Proposal for a directive of the European Parliament and of the Council amending Directives (EU) 2018/2001, (EU) 2019/944, (EU) 2024/1788 as regards acceleration of permit-granting procedures (COM (2025) 1007)