

VÖWG Contribution to the Consultation on the Review of the Alternative Fuels Infra- structure Regulation (AFIR)

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About the Association of the Public and Community Sectors in Austria

Our aim is to ensure that essential public services remain accessible, affordable and of high quality for everyone in Austria – both now and in the future. The VÖWG connects over 120 companies, institutions and organisations to promote the exchange of knowledge – for example in areas such as energy supply, public transport, water and wastewater management, waste disposal, economic and fiscal policy, housing, and health and social services. Furthermore, the VÖWG supports its members with a wide range of services, monitors political and regulatory developments, and strengthens the voice of public services at national and European level.

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Introduction

Regulation (EU) 2023/1804 on the deployment of alternative fuels infrastructure, the Alternative Fuels Infrastructure Regulation (AFIR), established a Union-wide framework to support the scale-up of zero- and low-emission mobility through the deployment of the necessary recharging and refuelling infrastructure. As part of the recently initiated review, the European Commission is assessing whether the existing targets and instruments remain suitable for meeting the current and future requirements of the transport sector.

AFIR is an important component of European climate, transport and industrial policy, particularly in relation to the decarbonisation of transport, the reduction of dependence on fossil fuels and the strengthening of the single market. Practical experience to date shows, however, that the main challenges lie in the design of the implementation, financing and infrastructure framework. Further shortcomings concern the deployment of infrastructure with sufficient power capacity, user-friendly access and the economic viability of the measures for the actors responsible for their implementation.

Public and municipal enterprises perform essential public service tasks and play a major role in the planning, financing, construction and operation of alternative fuels infrastructure. This applies in particular to public transport, inland waterway transport and aviation. VÖWG notes that the binding targets under the current AFIR are primarily focused on publicly accessible infrastructure along the trans-European transport network (TEN-T). Practical implementation in the relevant sectors also depends on other forms of infrastructure, including depot-based recharging infrastructure, infrastructure at other operational sites, port-related energy supply systems and airport ground infrastructure. These sector-specific requirements and the associated economic and regulatory conditions are not yet sufficiently reflected in the existing legal framework.

In light of this, VÖWG calls for a more differentiated and sector-specific development of AFIR. **Public and municipal enterprises, as providers of essential services, require a reliable regulatory and investment framework for the planning, financing, construction and operation of the necessary infrastructure.** Such a framework is required to reconcile the deployment of a sufficiently dense and geographically balanced infrastructure network with economically viable, affordable and high-quality public services.

An Overview of VÖWG's Positions

The following section outlines VÖWG's main priorities for the further development of AFIR. These concern infrastructure requirements, sector-specific implementation conditions and the economic prerequisites for effective implementation.

- **Recognise operational infrastructure as a system-critical prerequisite**
In public transport, particularly in the bus sector, the electrification of vehicle fleets is directly linked to the deployment of recharging infrastructure at depots and other operational sites. This infrastructure is generally not publicly accessible. The required investment extends beyond the recharging points themselves. It also includes enabling infrastructure such as grid connections, transformers and on-site electricity distribution infrastructure. These elements can account for a substantial share of the overall investment costs. Without targeted financial support for this infrastructure, the transition to zero-emission buses remains economically unviable in many cases. VÖWG therefore calls for depot-based and other operational recharging infrastructure to be explicitly recognised as an integral part of the AFIR framework and to receive targeted support through national policy frameworks and European funding instruments. With regard to hydrogen in road transport, a clear policy choice is required. If the EU intends to establish hydrogen as a relevant transport fuel, the existing AFIR targets should be made more ambitious. Otherwise, the regulatory approach should shift away from binding AFIR requirements and leave further infrastructure deployment primarily to national initiatives.
- **Systematically develop transport hubs as key recharging and refuelling locations**
The electrification of public transport requires both infrastructure at operational sites and infrastructure that can be used during regular service operations. In the bus sector, this concerns in particular terminal stops, interchange points and urban transport hubs where vehicles can recharge during scheduled layover periods. Such infrastructure is essential for operating longer vehicle rotations in a technically and economically viable manner without requiring additional journeys to the depot. VÖWG therefore calls for the systematic development of recharging and refuelling infrastructure at these

locations. Planning should reflect actual operational processes and take place in close coordination with integrated transport associations, competent public transport authorities and operators. The targets for passenger cars and light commercial vehicles along heavily trafficked routes should also be made more ambitious. Comparable requirements arise in ports and airports, where energy and alternative fuels infrastructure must be integrated into existing operational and logistical systems. Prioritising locations with high and predictable demand can increase the efficiency of infrastructure deployment and make better use of existing demand potential. Urban transport hubs are particularly relevant because they bring together different modes of transport and generate concentrated demand. Targeted infrastructure deployment at these locations can improve operational efficiency, facilitate multimodal transport and contribute to the achievement of climate objectives.

- **Address the specific requirements of public transport, inland waterways and aviation**

Infrastructure requirements differ considerably between transport sectors. In public transport, the electrification of bus fleets requires depot-based recharging infrastructure as well as additional recharging points at operationally relevant locations across the network. In inland waterway transport, port infrastructure plays a key enabling role. This concerns in particular shore-side electricity supply for inland waterway vessels and the provision of appropriate infrastructure for alternative fuels.

In aviation, the main requirements concern the external supply of electricity to stationary aircraft and the corresponding adaptation of airport ground infrastructure. AFIR should remain technology-neutral and focus on the provision of fossil-free or zero-emission energy rather than prescribe a specific technical configuration. Stationary systems, ground pits, mobile fossil-free ground power units and other equivalent solutions should therefore be treated on an equal basis. This is particularly important because many apron positions are currently supplied through mobile ground power units. Due to charging times, stand-by periods and operational availability requirements, diesel-powered units cannot necessarily be replaced by electric units on a one-to-one basis. The transition may therefore require additional equipment, recharging infrastructure and grid capacity. Where airports can demonstrate that the necessary grid, energy or site infrastructure, or suitable equipment, cannot be made available in time for reasons beyond their control or only at disproportionate cost, Member States should be able to grant time-limited extensions. The framework should also recognise airports as critical energy, mobility and resilience nodes and support storage facilities, reserve capacities, grid stabilisation, SAF and hydrogen readiness and crisis resilience. VÖWG therefore calls for differentiated, sector-specific targets and implementation mechanisms that reflect the actual technical and operational requirements of public transport, inland waterways and aviation.

- **Establish sustainable financing and investment frameworks for public and municipal enterprises**

The deployment of alternative fuels infrastructure requires significant upfront investment, complex authorisation procedures and long investment cycles. Public and municipal enterprises bear significant responsibility for planning and implementation and face considerable financial pressure in this context. VÖWG therefore calls for closer alignment between AFIR and European funding instruments such as the Connecting Europe Facility (CEF-T). The regulatory framework should also provide stronger incentives and sufficient certainty for long-term investment. This includes targeted funding for enabling infrastructure such as grid connections and transformers, practicable planning and authorisation procedures and reliable framework conditions for long-term investment decisions. Such conditions are also essential for planning the procurement of vehicles and the conversion of existing fleets. Investment decisions in the vehicle sector depend directly on the timely availability of suitable recharging and refuelling infrastructure and on local implementation conditions, including spatial planning, authorisation procedures and the coordination of local recharging infrastructure. To ensure that EU-wide infrastructure targets can be met on time, particularly the minimum infrastructure and power-output requirements along the TEN-T network, electricity system operators need early and reliable information regarding the locations and capacities that will be required. The necessary grid capacities should be made available and reserved for the relevant projects on the basis of a transparent, reliable and legally sound planning framework until the respective recharging infrastructure has been implemented. At the same time, grid capacity must be allocated in a non-discriminatory manner under the applicable regulatory framework, and system operators cannot prioritise individual use cases without an appropriate legal basis. This creates a need for closer and earlier coordination between the planning of alternative fuels infrastructure and electricity grid development.

For airports, European funding under the Connecting Europe Facility, the Alternative Fuels Infrastructure Facility and related instruments should be continued, simplified and broadened to cover the adaptation of apron positions, mobile ground power systems, pre-conditioned air systems, grid connections, transformers and storage facilities. Implementation also requires a clear allocation of responsibilities between airport operators, airlines, ground-handling service providers, parking operators, energy suppliers and other actors involved in the provision and operation of the relevant infrastructure.

- **Ensure practicable payment, billing and data standards**

AFIR establishes binding requirements not only for the deployment of alternative fuels infrastructure but also for access to and use of that infrastructure. These include requirements concerning ad hoc payments, price transparency, data provision, digital connectivity and technical interoperability. Effective use of the infrastructure requires transparent pricing structures, practicable payment options and reliable digital access to information on the location, availability and technical characteristics of recharging and refuelling facilities. Clearly visible signage should facilitate access to recharging facilities, while price information should be presented transparently and in an easily accessible format. These requirements should be designed in a manner compatible with technical interoperability, digital data and billing systems and the requirements of electricity grid stability. This also includes a standardised and comparable unit for displaying electricity prices. As a cost-effective and technology-neutral solution, the use of static QR codes for ad hoc payments at smaller recharging stations should remain permissible. VÖWG also identifies a specific need for improvement in the design of payment and billing systems. In the case of card-based ad hoc payments at recharging points, payment records often display only the amount debited and the name of the payment recipient. To ensure practicable use, particularly in the operational context of public and municipal enterprises, additional transaction data must be made available in an electronically traceable format. This should include the location, the recharging point ID, the date and time of the recharging session and the quantity of electricity delivered. This information is essential for transparency and traceability. It is also required for tax and accounting purposes. VÖWG therefore calls for the AFIR requirements concerning transaction data, receipts and billing information to be further developed. Digital transaction data should be standardised across the European Union, electronically traceable and provided in a format that can be used for billing, tax and accounting purposes.

Conclusion

The AFIR review comes at a time when initial practical experience with the existing targets and implementation requirements is beginning to reveal recurring implementation challenges. The current Regulation provides an important basis for the development of an interoperable Union-wide infrastructure for alternative fuels. Practical implementation nevertheless requires greater attention to the technical, operational and economic conditions under which infrastructure is planned, financed and operated.

The review should therefore recognise depot-based and other non-publicly accessible recharging infrastructure more clearly, introduce sector-specific provisions for public transport, inland waterways and aviation and strengthen the coordination between alternative fuels infrastructure and electricity grid development. Closer alignment with European funding instruments is also required. Public and municipal enterprises need sufficient investment certainty, targeted support for enabling infrastructure and practicable planning and authorisation procedures. Reliable infrastructure and investment conditions are also a prerequisite for subsequent decisions on the conversion and procurement of vehicle fleets. The revised framework should also ensure transparent and practicable payment, pricing and transaction-data requirements. Public and municipal enterprises must be able to access standardised transaction data that meets operational, tax and accounting requirements.

In the aviation sector, AFIR should not be assessed in isolation. Its financial and operational effects must be considered together with ReFuelEU Aviation, the EU Emissions Trading System, energy and electricity price regulation and the applicable State aid framework. A cumulative regulatory impact assessment is required to avoid disproportionate cost burdens, preserve the investment capacity of European airports and reduce the risk of traffic shifting to non-European hubs and the associated carbon leakage.

VÖWG therefore calls on the European Commission to develop AFIR further through a sector-specific and implementation-oriented approach. The revised legal framework should reflect the actual infrastructure, operational and investment requirements of the relevant transport sectors and provide reliable conditions for their

implementation. A correspondingly refined AFIR can make a substantial contribution to the decarbonisation of transport while supporting economically viable, affordable and high-quality public services.

Responsible for Content

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