



Leaseurope Feedback on the Alternative Fuels Infrastructure Directive (AFID)

Leaseurope, the European Federation representing the leasing and automotive rental industries, supports the Commission's aim to improve the EU's network of recharging and refuelling stations for alternative fuel vehicles through the Alternative Fuels Infrastructure Directive (AFID). Improving this infrastructure is a vital component in increasing the uptake of alternative fuel vehicles within the EU, alongside a number of other important steps.

Currently, the deployment of alternative fuel infrastructure remains patchwork both across the EU and within different Member States. In order to ensure the AFID successfully addresses this issue then, the targets set out in the Directive should be based on a comprehensive methodology that takes into account not only the availability of alternative fuel stations, but also other factors, such as driver behaviour and the parameters of existing and future technology.

It is also important that additional factors impacting the widespread availability of public charging stations and alternative fuel stations for all types of vehicles and models are adequately addressed in the proposal. For example, there should be an attempt to homogenise rules on the use of electric vehicles and charging points across the EU, as well as ensuring the public charging stations are future proof, and will be able to be used long-term as the technology used in LEVs develops. Additionally, the charging and alternative fuel stations must be interoperable, and compatible with all/almost all vehicle models, irrespective of the manufacturer, vehicle type etc. Another important element is the ease of use for the average consumer. Factors such as the ability to pay by cash and card at stations, and reducing the amount of time needed to charge an electric LEV will be imperative in making these vehicles more attractive to consumers.

The targets included in the proposal should also assess other potential obstacles to the widespread use of LEVs, such as their comparatively high cost, as well as limited availability. The leasing and rental industries could play a key role in scaling up the use of LEVs, since it would make it possible for consumers and SMEs who do not have the financial resources to buy an LEV outright to use one at a reasonable cost.

Notably, leasing companies' ability to offer LEVs on a large scale relates to how lease agreements are regulated in some Member States, as it is not always possible to finance more than one asset under a single lease agreement. This is very problematic in the context of electric vehicles in particular, since the vehicle is regarded as a separate asset from the vehicle's battery. Moreover, in many cases a customer leasing an electric vehicle would also

Feedback Reference: F515158

want to lease an at-home charging station, and this would again require an additional separate lease agreement. Addressing this issue, and allowing for a more streamlined process for the consumer when it comes to leasing/renting a LEV, would be a major step forward in encouraging more customers to use LEVs.