Plattform Nachhaltiger Schwerlastverkehr

Submission

3 August 2026

AFIR review 2026: closing the infrastructure gap for heavy-duty vehicles

Overall, the Plattform Nachhaltiger Schwerlastverkehr (Sustainable Heavy-Duty Truck Platform), a project coordinated by the German Energy Agency, **fully supports the objectives of regulation (EU) 2023/1804 on the deployment of alternative fuels infrastructure (AFIR)** and acknowledges its significant successes over the past few years. However, we would like to propose targeted revisions **relating solely to the infrastructure for heavy-duty trucks (>12 t; N3)**.

Status quo: While the deployment of charging infrastructure for passenger vehicles has proven highly successful, with 96% of EU Member States already meeting their 2026 AFIR targets for light-duty vehicles and the TEN-T core network now fully covered by ultra-fast chargers, the electrification and adoption of alternative fuels for heavy-duty trucks still lags significantly behind. In Q1 2026, just 2.3% of heavy-duty trucks were battery-electric, while 2.1% ran on LNG/CNG, which is largely attributable to insufficient infrastructure, particularly for battery-electric vehicles (BEVs). To address this disparity, AFIR must **evolve to better account for the needs of heavy-duty transport**, which, despite representing a small fraction of the vehicle fleet, is responsible for **one-third of road transport emissions in the EU**.

Article 4 - Targets for recharging infrastructure dedicated to heavy-duty electric vehicles

Consider the strategic role of logistics hubs

The scope of AFIR should be extended beyond the TEN-T core network to include recharging infrastructure for heavy-duty electric trucks at logistics hubs, such as ports and airports, where high-power charging is critical for enabling efficient operations of road vehicles during loading, unloading, and layover times.

A project by dena

Further, logistics hubs play a central role in the energy transition of the logistics sector, as they are **evolving into integrated energy hubs** that combine charging infrastructure, photovoltaic systems, battery storage, and intelligent load management. By integrating logistics hubs into AFIR, the regulation can better align with the growing energy demands of the sector and foster the development of sustainable, self-sufficient energy ecosystems at these strategic locations.

Additionally, the growing demand for **auxiliary energy**, such as external power supplies for refrigeration units, should be accounted for in infrastructure planning.

Include depot charging and megawatt charging in Alternative Fuels Infrastructure Facility (AFIF) funding calls

AFIF should explicitly include depot charging in its funding calls, as it is the primary use case for logistics companies, covering approximately 70-80% of HDV charging demand. While some Member States, such as Germany, have recently launched successful national funding programmes for depot charging, which have seen exceptionally high participation, **a fragmented approach risks slowing down** the electrification of heavy-duty fleets.

Although the AFIR framework already mandates minimum power levels of 1,400 kW per HDV charging site and at least one 350 kW charger every 60 km along the TEN-T core network by 2025, it **does not yet explicitly prioritize Megawatt Charging System (MCS)** as a critical enabler for long-haul electric trucking. While depot charging will remain the primary use case for logistics companies, the current lack of high-power public charging options that enable full charging during mandatory rest periods or quick intermediate top-ups is a critical gap for cross-border and long-distance operations. Financial support mechanisms such as the Alternative Fuels Infrastructure Facility (AFIF) could be expanded to explicitly cover MCS projects.

Recital 8 and Article 8 - Infrastructure for liquefied methane for road transport vehicles

Introducing targets for Bio-LNG and -CNG

To align with AFIR's objectives under Article 8, binding targets for biomethane infrastructure should be introduced to support the decarbonisation of heavy-duty transport. Maximum distances between Bio-CNG and Bio-LNG refuelling stations should thereby be defined. This should be accompanied by a regulatory framework that consistently accounts for the CO_2 savings achieved through biomethane which has demonstrated its value in heavy-duty transport.

Plattform Nachhaltiger Schwerlastverkehr

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