

ACEA recommendations for Workstream Demand and Infrastructure



The current market data shows a stagnating demand for zero-emission passenger vehicles with BEVs registrations only [accounting for 13.6%](#) in 2024, down from 14.6% in 2023.

While the long-term goal is to establish a fully market-driven demand for low and zero-emission vehicles in the EU, the current pace of adoption remains insufficient to meet Europe's climate and industrial ambitions. For this reason, the European Automotive Manufacturers' Association (ACEA) urges the Commission to come up with concrete proposals to stimulate the demand for zero-emission vehicles, both for light-duty and heavy-duty segments.

MEASURES TO STIMULATE DEMAND FOR LIGHT DUTY VEHICLES:

An EU incentive scheme to stimulate demand for light-duty vehicles should be administered under the following conditions:

- Urgent introduction (or reintroduction) of purchase incentives at the member state level.
- Substantial financial commitment from any relevant EU financial sources, allocating dedicated funding to support a pan-European subsidy scheme, complemented by national contributions.
- Must cover all vehicle segments, following a technology-neutral approach.
- A long-term subsidy scheme, preferably until 2035 (in line with the CO2 Regulation).
- Subsidies based on vehicle price and/or household income without imposing a strict price cap on eligible vehicles, as this would promote consumer choice and ensure affordability without distorting the market and limiting innovation.

An example below demonstrates how this scheme could be administered:

Scheme Budget: € 15B (5M cars x € 3000 average) + € 3B (1M vans x € 3000 average)

- Scope: The scheme should benefit private consumers, businesses and fleets.
- Duration: as long as it takes to have a mature market, at the very least 3-5 years.
- Coordination at COM level to ensure consistent implementation at Member State level.
- All electrified vehicles powertrains should be considered and a staggered approach should be implemented with additional purchase incentives for vehicles with lower emissions.
- Combination of subsidy scheme with scrapping premium for older vehicles (Euro 5 or older (minimum 10 years old)).
- Where appropriate, the scheme could be complemented by national-level initiatives.

- Tax and Depreciation rules for low-zero emission vehicles or a temporary reduction on annual circulation taxes.
- VAT rate reduction for new vehicle sales.

Introducing mandatory EU-wide targets for corporate fleets for light-duty vehicles is not seen as appropriate to solve the problem of demand, as they do not address the problem of limited consumer appeal (e.g. due to lack of infrastructure and low resale value) and do not provide any “carrots” (e.g. tax breaks). Fleet owners are already extending the holding period for EVs to mitigate losses from devalued assets. Mandatory targets could exacerbate this issue, slowing fleet renewal as businesses would delay ZEV purchases to avoid greater financial losses.

Besides, the goal of increasing the share of ZEVs in corporate fleets can already be effectively achieved through targeted fiscal measures in each EU Member State. Belgium's success story, where most of new corporate fleet registrations are low-emission vehicles, exemplifies this approach. Notably, no EU legislation was needed to accomplish this important milestone in a short period.

Key fiscal policy elements contributing to this success include generous tax breaks, incentives for charging infrastructure, and phased implementation.

MEASURES TO STIMULATE DEMAND FOR HEAVY-DUTY VEHICLES:

- Ensure all publicly procured services directly or indirectly related to transport with heavy-duty vehicles are aligned with the CO2 reduction targets, focus on zero-emission investments only and are enforced accordingly. The provisions in the Clean Vehicle Directive, especially with respect to the timeline and definitions of what are “clean” and “green vehicles” should be reviewed and aligned with the revised CO2 standards.
- Public procurement of transport services should consider progressively increasing CO2 reductions and ultimately focus on ZEVs. A ‘European value chain’ provision should underscore the significance of zero-emission technologies for strengthening Europe’s industrial base and supporting economic prosperity.
- Shippers and logistics providers, who tender transport services, should be mandated to progressively increase the share of their shipments handled by ZEVs.
- Comprehensive support measures for transport operators must provide targeted fleet renewal incentives.
- The swift and consistent implementation of the Eurovignette Directive and CO2-based road user charges across all Member States is crucial for driving the transition to zero-emission vehicles (ZEVs). Currently, only a few Member States make use of

the option to fully exempt ZEVs from CO₂-based tolls, missing an opportunity to strengthen the business case for these vehicles.

- For further details, please consult our [position paper](#) on decarbonising heavy-duty road transport.

MEASURES TO STIMULATE INFRASTRUCTURE DEVELOPMENT

Light duty vehicles

The current targets for the recharging and refuelling infrastructure for Member States do not adequately reflect the necessary number of vehicles expected to be on the roads.

The AFIR target set out by policymakers represents only a bare minimum, and infrastructure deployment must fully align with CO₂ reduction goals. To encourage mass adoption of zero-emission vehicles, re-charging and re-fuelling must be seamless, accessible and convenient for consumers. As demand for alternatively powered vehicles continues to rise, the availability and accessibility of charging points are becoming increasingly crucial. ACEA has reiterated that, to successfully transition to electric mobility, **a more ambitious rollout of charging infrastructure is required.**

AFIR calculations

- 6.5 million charging points by 2030
- 13.4 million charging points by 2035

ACEA own estimates aligned with the CO₂ targets:

- 8.8 million charging points by 2030
- 18.8 million charging points by 2035

This stark difference underscores **the urgent need to accelerate the rollout of charging and hydrogen refuelling stations.**

To ensure a balanced and effective transition, country-specific infrastructure targets are necessary to accelerate progress in underdeveloped markets while preventing excessive concentration in a few leading nations. As of the end of 2024, the Netherlands, Germany and France accounted for 56.7% of all charging stations, demonstrating the stark disparity in infrastructure distribution. Qualitative parameters and targets need to be fixed (e.g. 99% reliability of the charging points), as well as “density parameters” to be included to ensure full coverage across the whole EU.

Heavy-duty vehicles

The situation with a dedicated recharging infrastructure network for heavy-duty vehicles (HDV) is even more challenging. Annual registrations of zero-emission vehicles stood at 2.3% across EU-27 in 2024. To meet the CO₂ reduction targets, approximately 400,000

ZEVs must be on the road and around 35% of all new registrations must be zero-emission vehicles by 2030.

AFIR sets targets for fast recharging stations every 60 km along the TEN-T core and every 100 km along TEN-T comprehensive network; to be established starting from 2025, full TEN-T network coverage must be achieved by 2030. Targets are also defined for overnight charging in safe and secure parking areas and for destination charging in all urban nodes.

Although there were more than 15,000 recharging points in the EU with a power of 350 KW at the end of 2024, which could theoretically also serve HDVs, the distinct space requirements (manoeuvrability, truck + trailer length, width and height restrictions) leave many of these inaccessible for HDVs. According to the Commission, “still very few dedicated recharging points for heavy-duty vehicles exist today.”

To power the necessary ZEV fleet, around 50,000 public chargers for HDVs, including ~35,000 MCS chargers, must be operational by 2030.

The Commission should therefore:

- Present a proposal for more demanding AFIR requirements to speed up charging and hydrogen refuelling infrastructure deployment as part of the planned AFIR review. Dedicated charging spots for light commercial vehicles (with trailers) must also be considered as part of the review.
- For light-duty vehicles
 - revisit the power-output parameter impacts and;
 - introduce density parameter.
- The European Commission also requires a minimum network of 700 bars hydrogen refuelling stations to be in place by 2030, in line with Alternative Fuel Infrastructure requirements.
- For heavy-duty vehicles
 - Address the insufficient AFIR ambition level;
 - Add bus-specific requirements;
 - Strengthen the enforcement mechanism to ensure timely implementation;
 - Urgently create transparency and set up regular monitoring of the available dedicated charging and hydrogen refuelling infrastructure for heavy-duty vehicles.
- Review the Energy Performance of Buildings Directive, including clear provisions on “right to plug” and time limits for permitting and installation (similar to the Net Industry Zero Act pilot projects with fast-track procedures).
- As part of the Action plan for affordable electricity, provide guidance/introduce a system to ensure affordable prices from the public recharging points across the EU.
- For heavy-duty charging infrastructure, limited grid capacities are the main bottleneck and need to be addressed by several measures:

- increase transparency on available grid capacities to ensure efficient use of already existing capacities.
 - accelerate and standardise approval procedures.
 - speed up grid expansion by promoting proactive grid planning and anticipatory investments.
- Provide financial support for the installation of heavy-duty depot charging infrastructure.
- HDV charging hubs along logistics corridors should become strategic and critical projects of common European interest.
- Put in place a Clean Logistics Corridor Initiative allowing fast-track building permits, prioritised grid connections and dedicated public funding for infrastructure deployment, underpinning a resilient and cleaner European society.



ABOUT THE EU AUTOMOBILE INDUSTRY

- 13.2 million Europeans work in the auto industry (directly and indirectly), accounting for 6.8% of all EU jobs
- 10.3% of EU manufacturing jobs – some 3.1 million – are in the automotive sector
- Motor vehicles are responsible for €383.7 billion of tax revenue for governments across key European markets
- The automobile industry generates a trade surplus of €106.7 billion for the European Union
- The turnover generated by the auto industry represents over 7.5% of the EU's GDP
- Investing €72.8 billion in R&D per year, automotive is Europe's largest private contributor to innovation, accounting for 33% of the EU total

ACEA REPRESENTS EUROPE'S 16 MAJOR CAR, VAN, TRUCK AND BUS MANUFACTURERS

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