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# Review of the Proposal for a Regulation of the European Parliament and of the Council of Union guidelines for the development of the trans-European transport network (COM(2021) 812)

BIL Sweden hereby wishes to comment on the proposal for a regulation of the European Parliament and of the Council of Union guidelines for the development of the trans-European transport network (TEN-T).

## Summary

BIL Sweden welcomes a revision of the TEN-T guidelines. TEN-T is an important instrument for creating an efficient and sustainable European transport system which is needed to support growth, employment, and cross-border relations in Europe. We propose that High Capacity Transport (HCT) is introduced in the TEN-T guidelines as a possibility since it will increase the transport efficiency.
To help Europe reach a transport sector free from fossil fuels, it is also important to implement relevant requirements on charging infrastructure along the TEN-T network. In our proposal we have listed necessary requirements for charging infrastructure, in line with our comments regarding Alternative Fuels Infrastructure Regulation (AFIR).

## Proposal

### Charging infrastructure alongside the TEN-T network for passenger cars

BIL Sweden believes that "charging hubs" should be established every 100th kilometers along the TEN-T core and comprehensive network to cover the need for fast charging for electric passenger cars. It is important to optimize the expansion by establishing these charging hubs at road junctions so that more roads can take advantage of the charging stations. At each charging hub there should be several charging points, so that the risk of arriving at a fully occupied charging hub is minimized. By establishing charging hubs with lesser distance than proposed in AFIR, we create opportunities for businesses, such as shops, gyms, restaurants cafés and other facilities. Drivers of electric cars prefers staying at a charging hub with food, coffee, and toilets available, rather than a charging station that only offers charging. These charging hubs also make it easier in terms of infrastructure, as it is more economically efficient to supply a geographical location with a high amount of power, rather than to supply several different locations with smaller amount of electrical power.

Drivers of electric cars already testify that queues are formed at popular public charging stations due to low charging power and low amount of charging points. At the same time, we know that electric cars that are manufactured today and will arrive on the market within one to two years will be able to charge at much higher charging power. BIL Sweden therefore proposes that each charging hub should offer at least 600 kW in total and offer at least two charging points with at least 150 kW charging power each until 31 December 2025. The same charging hubs should until 31 December 2030 offer at least

1 000 kW charging power in total and offer at least four charging points with at least 150 kW charging power each along the entire TEN-T road network.

**Charging infrastructure alongside the TEN-T core network for commercial vehicles**

Electric commercial vehicles, such as heavy-duty vehicles need a specifically different charging infrastructure compared to electric passenger cars. To ensure an optimal coverage of charging possibilities for electric commercial vehicles throughout the Union, the TEN-T road network should offer a mix of overnight charging infrastructure, charging infrastructure at urban nodes and charging infrastructure along the way. The charging infrastructure should have a sufficiently high power to charge the vehicles within the time of the driver's legal break. The expansion of charging infrastructure is equally important at non-public locations, such as depots and logistic centers, to ensure overnight charging and charging at the destination. Public authorities should take steps in establishing their revised national policy framework to ensure this.

In addition to the proposals in AFIR, BIL Sweden expects a dialogue on how to generally improve the conditions for those who want to establish and operate charging stations for heavy-duty vehicles to cover the total need for charging power.

BIL Sweden proposes the following regarding the development of public charging infrastructure for heavy-duty vehicles along the TEN-T core network:

- Charging stations every 60 kilometers along the TEN-T core network by 31 December 2023. Each charging station must offer at least 1 400 kW of total charging power, with at least two charging points offering at least 350 kW charging power each.
- By 31 December 2025, the above charging network must offer at least 2 100 kW total charging power at each charging station with at least one charging point offering at least 800 kW charging power.
- By 31 December 2030, the above charging network must offer at least 3 500 kW total charging power at each charging station with at least two charging points offering at least 800 kW charging power each.

The distance target of 60 kilometers refers to an average distance on the road network, but the exact location should be determined by local conditions.

**Charging infrastructure alongside the TEN-T comprehensive network for commercial vehicles**

BIL Sweden proposes the following regarding the development of public charging infrastructure for heavy-duty vehicles along the TEN-T comprehensive network:

- Charging stations every 60 kilometers along the TEN-T comprehensive network by 31 December 2025. Each charging station must offer at least 1 400 kW of total charging power, with at least two charging points offering at least 350 kW charging power each.
- By 31 December 2030, the above charging network must offer at least 2 100 kW total charging power at each charging station with at least one charging point offering at least 800 kW charging power.
- By 31 December 2035, the above charging network must offer at least 3 500 kW total charging power at each charging station with at least two charging points offering at least 800 kW charging power each.

The distance target of 60 kilometers refers to an average distance on the road network, but the exact location should be determined by local conditions.

In addition to the above, it is also important to establish charging infrastructure in safe and secure parking areas. BIL Sweden proposes at least four charging points dedicated to heavy-duty vehicles at each safe and secure parking area along the TEN-T core and comprehensive network, by 2025 at the latest.

Each urban node publicly accessible recharging point dedicated to heavy-duty vehicles should offer at least 1 600 kW charging power in total, with at least 150 kW charging power per each charging point and at least two charging points with at least 350 kW charging power by 31 December 2030.

**Easy accessible charging stations**
EV drivers are already witnessing difficulties with different apps, charging cards and key tags needed to charge their vehicles at public charging stations. BIL Sweden therefore propose that each public charging point with at least 50 kW charging power should have the possibility to start an ad hoc charging session via credit card. This should be introduced as a requirement on charging stations along the TEN-T core and comprehensive network by 1 January 2023 at latest for passenger cars and 1 January 2027 for commercial vehicles.

It is also of importance that the charging fees are reasonable, easily and clearly comparable, transparent and non-discriminatory. As an example, pricing per minute should not be considered as transparent as it is not possible to calculate in advance what a charging session will cost. It is also impossible to compare the price of a charging session on a charging station with a minute fee to a charging station with a kWh fee. How much energy an electric car can receive during a certain period depends on several factors such as outdoor temperature, battery temperature, battery state-of-charge etc.

**Hydrogen refueling infrastructure along the TEN-T road network**
The introduction of fuel cell vehicles is gradually gaining momentum, with a focus on heavy-duty vehicles. To speed up the introduction, BIL Sweden believes that the implementation of hydrogen refueling infrastructure should take place faster than proposed in the AFIR and that an intermediate target should be set for several Member States as early as 2026 for heavy-duty vehicles. However, it is also important that the service stations set up are also accessible to light vehicles.

**LNG infrastructure for road transport vehicles**
BIL Sweden proposes the member states should establish publicly accessible refuelling points for LNG every 400 kilometers along the TEN-T core network by 2025.

We look forward to continued dialogue and are available for any questions or clarifications.

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