

# COMMENTS ON ALTERNATIVE FUEL INFRASTRUCTURE DIRECTIVE ROADMAP

In response to the Revision of the Directive 2014/94/EU on the Deployment of Alternative Fuel Infrastructure roadmap released by the European Commission for Public Consultation, the Association for Emissions Control by Catalyst ([AECC aisbl](http://www.aecc.eu)) representing the companies of the European emissions control industry, would like to comment as follows:

- AECC fully supports the European Commission policy priority of accelerating the deployment of alternative fuel infrastructure to contribute to the EU's overall objective of significantly reducing CO<sub>2</sub> emissions from road and non-road transport and reducing the dependency on fossil fuel.
- Specifically on road transport, modern light and heavy duty vehicles are now equipped with internal combustion engines with integrated emission control technologies, allowing for combined emissions reduction of nitrogen oxides (NO<sub>x</sub>), particles (PM & PN) and carbon dioxide (CO<sub>2</sub>)<sup>1</sup>.
- The roadmap mainly talks about the creation of additional fuelling infrastructure. The use of alternative, sustainable and renewable low-carbon fuels however reduces GHG emissions while using current technology and fuelling infrastructure. The revision of the Alternative Fuel Infrastructure Directive (AFID) should also be a unique instrument to reduce GHG emissions of the existing vehicles fleet through increased blending of renewable fuels in the existing European fuelling infrastructure. In this sense the AFID needs a direct link as an enabler to the Renewable Energy Directive objectives.
- Charging infrastructure is particularly significant for hybrid and electric vehicles which will take an important share of the vehicle fleet in the medium term. Whether for personal use, business or services, hybrid, petrol- and diesel fuelled vehicles will continue to provide practical mobility solutions for the European Union in the foreseeable future. Required refuelling and recharging infrastructure to support the market penetration of new propulsion technologies must also be guaranteed in every part of the European Union, ensuring that appropriate choices are available to everyone, from big European cities to the countryside<sup>2</sup>.
- A shift from fossil fuel to more sustainable fuels for transport will enable internal combustion engine applications to continue contributing with a positive environmental impact. On the other hand, a big opportunity to decarbonise all of the existing fleet is opened through a robust charging and fuelling infrastructure and the broader deployment of alternative and sustainable low-carbon fuels.

Should you need more information, you can contact AECC at [info@aecc.eu](mailto:info@aecc.eu).

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## References:

<sup>1</sup> "Integrated Diesel System Achieving Ultra-Low Urban and Motorway NO<sub>x</sub> Emissions on the Road", J. Demuyck, et al.; 40<sup>th</sup> International Vienna Motor Symposium, 15-17 May 2019

<http://www.aecc.eu/wp-content/uploads/2019/04/190516-AECC-IAV-IPA-Integrated-Diesel-System-achieving-Ultra-Low-NOx-on-the-road-Vienna-Symposium.pdf>.

<sup>2</sup> AECC 2025 Vision for clean, efficient, convenient and affordable mobility

<http://www.aecc.eu/wp-content/uploads/2020/02/200203-AECC-Vision-Document-Web.pdf>.

*AECC is an international non-profit scientific association of European companies operating worldwide in the research, development, testing and manufacture of key technologies for emissions control. Their products are the ceramic substrates for catalysts and filters; catalysts (substrates with catalytic materials incorporated or coated); adsorbers; filter-based technologies to control engine particulate emissions; and speciality materials incorporated into the catalyst or filter. Members' technology is integrated in the exhaust emissions control systems of cars, commercial vehicles, buses, non-road mobile machinery and motorcycles in Europe. More information on AECC can be found at [www.aecc.eu](http://www.aecc.eu).*

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