
Brussels, 10 September 2013

COMMENTS AND RECOMMENDATIONS ON DRAFT REPORT OF RAPPORTEUR CARLO FIDANZA ON THE PROPOSAL FOR A DIRECTIVE ON THE DEPLOYMENT OF ALTERNATIVE FUELS INFRASTRUCTURE

In view of your further proceedings on the **draft report of Rapporteur, Mr. Carlo Fidanza**, on the proposal for a Directive on the deployment of alternative fuels infrastructure, Orgalime kindly submits its comments and recommendations to regulators with its request for support:

The European engineering industries support the promotion of a sustainable range of transport solutions and the build-up of interoperable, alternative fuels infrastructure in Europe as a means to stimulate growth, jobs and technology take up. As producers of the equipment that represent the essential link between the electric vehicle and the electric grid, we show a specific interest in the Directive's provisions concerning electric vehicle infrastructure. Our comments therefore focus on the electrification of means of transport, and particularly on the wide deployment of electric vehicles as main source of energy savings and mitigation of environmental impact.

Orgalime believes that the draft report of Mr Fidanza makes every effort to take into account the complexity of infrastructure deployment in practice and is built on several positions, which we fully support, namely:

- To improve the diversification and security of Europe's energy supply.
- To set a stable policy framework with binding targets to stimulate investment in the deployment of relevant infrastructures by 2020. Incentives and public support will have an essential initial role to play.
- To adopt a strategic approach for the deployment of alternative fuels in all transport modes and build technical specifications based on market needs, realities, technology neutrality and with the involvement of European standardisation to keep standards up to date to technological processes, sound engineering practice and safety requirements.
- To provide interoperable, smart and inclusive solutions for electric vehicle recharging that preserve the high level of safety achieved by the EU's existing regulatory framework derived from the Low Voltage and EMC directives and ensure consistency with Member States' existing national wiring regulations.
- To strengthen the national policy frameworks for the deployment of alternative fuels and their infrastructure with ambitious targets by 2020 and comprehensive national policy frameworks, and mid-term assessments.
- To recognize the key role played by both, regional and local authorities, and including the engagement of the industries concerned in the effective deployment of alternative fuels infrastructure.
- To establish EU framework conditions and rules that provide for fair competition.
- To enhance consumer information on alternative fuels.
- To enable Member States to earmark financial resources to the deployment of alternative fuels infrastructure from EU Structural Funds.

Orgalime, the European Engineering Industries Association, speaks for 38 trade federations representing some 130,000 companies in the mechanical, electrical, electronic, metalworking & metal articles industries of 23 European countries. The industry employs some 10.3 million people in the EU and in 2012 accounted for some €1,840 billion of annual output. The industry not only represents some 28% of the output of manufactured products but also a third of the manufactured exports of the European Union.

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However, **Orgalime is concerned that some elements of the draft report could create confusion:** Notwithstanding our support for the Rapporteur's justification, the wording of amendment 69 concerning the proposal for the requirement of equipping recharging points for electrical light vehicles should in our view be improved. The Directive should allow the use of all existing charging modes that remain necessary for charging L-category electric vehicle. Also, replacing the term "slow charging" with "normal charging", as amendment 28 suggests, could in our view be misunderstood, especially by consumers. The respective amendments should equally be reworded by using more representative definitions. Finally, the objective of amendment 41, which we support, should equally translate into a rewording to avoid the use of the insufficiently representative term "normal" and to secure technology neutrality.

In the light of above listed positions, **we also feel that the draft report could be strengthened in the following respects with additional amendments:**

- To **foresee the involvement of European standardisation organisations**, as suggested by the Rapporteur in amendment 68 on annex III, **in Article 4 of the Directive directly** and together with a reference to the existing **standardisation mandate M468** as well as the requirement to publish adopted European standards in the Official Journal of the EU – this will strengthen the development of a harmonised interface between the vehicle and the grid in Europe.
- Given the technical nature of the Directive, and the technical specifications of recharging points in particular, Orgalime recommends introducing **a stakeholder mechanism in Article 4.11** to allow for appropriate consultation of stakeholders prior the adoption of any delegated act for the implementation of the Directive.
- To suggest **a new Article 4.6a** to ensure a non-discriminatory and convenient access to public charging infrastructure.
- Highlighting **the smart grid dimension of this proposal**, notably that investments in smart grids will be enabled and become economically feasible due to the integration of vast numbers of electric vehicles and allow for the use of smart charging.
- Properly identifying and providing **EU R&D financing** to combat the existing significant barriers for the deployment of e-vehicles, such as the development of high performance, reliable batteries.

IN CONCLUSION

Orgalime kindly asks you to SUPPORT amendments 16, 32, 35, 37, 38, 39, 44, 71 of the draft report of Rapporteur Fidanza.

We kindly request a REWORDING of amendments 28, 41, 68 and 69 in the light of our suggestions for further improvements of the draft Directive.

We also generally support amendment 6 of the draft opinion of the ITRE Rapporteur, Mrs. Niki Tzavela, and request its take up in the report of the TRAN committee.

We call on regulators to enact rapidly an ambitious legislation for a technology neutral deployment of alternative fuels infrastructure as a means to stimulate sustainable growth and jobs in the EU and the international competitiveness of European engineering industries in line with the EU's Industrial Policy Communication.

Orgalime looks forward to contributing to the further discussions of European regulators and we remain available for any further information that you may wish to obtain with a view to maintaining sustainable legislation.

We provide more detailed views and recommendations hereafter in the Annex.

Annex:

Article 2.3: While we agree with the Rapporteur that the term “slow” should not be used, we suggest avoiding the term “normal”, which would imply that other methods (for example “fast charging”) would not be normal. For the purposes of a Directive and providing clear technical specifications, a more representative definition should be adopted.

If a change of the terms is needed for better consumer understanding, we recommend that all charging methods should be defined by their technical characteristics (up to 22kw AC). The time taken to charge the battery of an electric vehicle is dependent on a wide range of factors, including those associated with the vehicle (for example, the battery size and technology, the capacity and efficiency of the on-board charger) and those associated with the installed equipment (for example the rated current of the plug and socket-outlet, and the supply circuit).

Article 3.1: We support the Rapporteur’s intention to advocate for comprehensive national frameworks with ambitious (national and intermediate) targets. Orgalime believes that both, Article 3.1 and Annex I, are key elements of the draft Directive that should be supported and implemented without delay.

Article 4.1: We fully support a close cooperation of Member States with regional and local authorities and the industry concerned when putting in place a minimum number of recharging points for electrical vehicles. Orgalime acknowledges that the numbers and the proposed time limit will require efforts from Member States. Where inconsistencies with national framework policies exist, these may have to be addressed. Perhaps, the numbers suggested in the draft Directive should be discussed in the light of desired figures of car sales in EU Member States.

Article 4.3.3 and Annex III.1.1: Orgalime is an active promoter and supporter of the European standardisation work on e-mobility and electric vehicles. We noted with some reservations that the draft Directive imposes a political decision on a standard interface between the infrastructure and the e-vehicle through a defined technical specification.

Orgalime supports the Rapporteur’s objective to ensure that European standardisation organisations should be mandated in the framework of this Directive so that standards are up to date to technological progress and good engineering practice. Additionally, Orgalime supports the objective of preserving the high level of safety achieved by the EU’s existing regulatory framework, derived from the Low Voltage and EMC Directives and ensuring consistency with Member States’ existing national wiring regulations to secure the high level of safety of electrical installations and electric vehicles, which we consider a most relevant use case of future smart grids. Standards development and market demand should define the final specification. Finally, we believe that harmonised European standards remain relevant to ensure future interoperability and connectivity between the charging infrastructure and the electric vehicle.

Therefore, we agree with the justification of amendments 68 and 69 that European standardisation organisations shall be mandated in the framework of this Directive to adjust the current standard ruling connectors Type 2 (and their socket outlets) in the light of specific safety requirements. However, rather than in the annex, Orgalime recommends introducing the requirement of involving European standardisation organisations directly in **a new Article 4a**, to foster the bottom up development of further technical specifications and their harmonisation through European Standardisation.

We suggest that such an amendment should also ensure that the existing Mandate 468 will be considered before the Commission adopts any additional mandate for European standardisation organisations. Finally, any harmonised standard adopted should be published in the Official Journal.

Orgalime also believes that amendment 41 carries important improvements, especially as it aims at preserving the high level of electrical safety in Europe, which we support. However, the amendment also includes controversial aspects from our point of view. We suggest rewording this amendment to avoid the use of the not sufficiently representative term “normal” and to secure technology neutrality.

Article 4.6: We support that the draft report proposes that all publicly accessible recharging points for electric vehicles shall be equipped with “adequate systems providing clear and transparent consumer information concerning the recharging cost and specifying whether the price indicated covers a service provision or the amount of electricity (kWh) consumed”.

We would like to suggest a **new Article 4.6a** to ensure a non-discriminatory and convenient access to public charging infrastructure. Cross-providers must be given access at the charge pole, and charging networks must offer an e-Roaming functionality to allow and track charging from third-party providers. This would also help infrastructure operators increase traffic on their charging stations.

Annex III.1.1, paragraph 1a new: Orgalime supports the proposed inclusion of the AC normal recharging points for L-category electric vehicles, which shall comply with EN 61851-1:2011 and can be equipped, with connectors of Type 3A (standard EN 62196-2:2012). Furthermore, we believe that in parallel to the dissemination of mode 3 recharging points, the use of modes 1 and 2 will remain relevant and necessary for the charge of vehicles, including L-category electric vehicle. Consequently, we would suggest a rewording of amendment 69, as the way it is currently worded would not allow for the use of all existing charging modes.

Generally, we welcome the extension to also include light vehicles, such as bicycle, tricycle, quadricycle and scooters, in the scope of the Directive with a view to their better dissemination in the market. We also appreciate that the Rapporteur acknowledges that light electric vehicles and any infrastructure delivered will have different needs and recharging requirements in comparison to heavy commercial electric vehicles, by referring to Regulation (2013)168.

Additionally, we would recommend inserting a **new Article 4.3a** that ensures that requirements mentioned in Article 4 paragraph 3 do not prevent the use of other charging modes, especially modes 1 and 2, such as defined in standard EN 61851-1:2011 (or updated standard EN 61851-1:2012). Member States should define a maximum value of the load in accordance with national safety rules specified for interfaces connected to the fixed electrical installation.

Annex III.1.2, paragraph 2a new: We appreciate that the Rapporteur grants a transitional period for CHAdeMO and that the DC fast recharging points for electrical vehicles may be alternatively equipped with connectors of Type “CHAdeMO” until 31 December 2018. There is a mix of different vehicle models already existing on the market, which enable DC recharging. Some are fitted with Combo2 and other with CHAdeMO. Due to the fundamental difference between these two standards, the industry should, in our view, at this stage not be restricted in installing infrastructure, which is potentially not compatible with the software of vehicles already on the market. This would create potential barriers to the take up of vehicles currently being manufactured by leading OEMs.

We regret that the following issues have not been addressed in the draft report. These would, in our view, be relevant for a successful implementation of the Directive in the future and should therefore be taken up in the further proceedings:

Article 4.11 empowers the Commission to adopt delegated acts for the implementation of the final Directive. Here, Orgalime recommends introducing a **stakeholder mechanism** to allow for appropriate consultation of stakeholders prior the adoption of any such delegated act.

A new recital: In Orgalime's views the European-wide deployment of smart grids and the large scale adoption of electric vehicles cannot be decoupled, as both are part of the same effort to increase efficiency and to integrate renewable energy sources into Europe's electricity system. We recommend that legislators should insert a reference in the Directive to the Communication "Smart Grids: from innovation to deployment (COM 2011)" through a new recital. Smart grids will actively promote smart charging, as well as load and energy management, and consequently, enable the integration of vast numbers of electric vehicles.

A new recital 18 a: In our view one should remember that other more significant barriers exist for the deployment of e-vehicles today, such as the development of high performance, reliable batteries for electric vehicles and their costs, securing safety and overcoming the low acceptance of customers. Therefore, we support amendment 6 from the draft ITRE opinion, reflecting the need to ensure and safeguard the competitiveness of European industries, and that necessary EU financing will be provided for further research and development into the deployment of alternative fuels infrastructure, such as electric batteries for electric vehicles.

We thank regulators for taking these comments and suggestions into account and look forward to further contributing to the debate.

For further information, please contact:

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