



BRIEFING - September 2026

Unlock public EV charging price transparency and competition

T&E position on the revision of the Alternative Fuels
Infrastructure Regulation for Light Duty Vehicles

Summary

T&E position on the revision of AFIR.

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The [Alternative Fuels Infrastructure Regulation \(AFIR\)](#) is the cornerstone of the EU's public charging infrastructure. By establishing a baseline public charging coverage across the EU (distance-based targets) and ensuring the growth of charging infrastructure in line with national battery-electric vehicles (BEV) uptake (fleet-based targets), AFIR provides the necessary framework to electrify road transport.

The results are already visible. The EU public charging network reached record levels with 1.1 million chargers deployed by the end 2025 and with EU countries on their way to meet or exceed AFIR targets (see [T&E's EV charging dashboard](#)).

With the EU's public charging network now maturing, AFIR must now shift its focus from the quantity of public infrastructure towards its quality. AFIR remains the strongest tool to effectively address user experience challenges, particularly in terms of price and information transparency, accessibility, and comparability.

T&E's recommends that the AFIR revision includes the following measures to support the development of a seamless, transparent, and competitive EU public charging network:

- **Standardise and limit public charging prices to three components:** charging price (€/kWh), Charging Point Operators (CPOs) standardised idle or overstay fee (applying once charging ends), and any roaming or other commercial fees charged by Mobility Service Providers (MSPs).
- **Clearly display all price components and conditions, before each charging starts,** including pre-authorisation and overstay fees, in a standardised format.
- **Clearly indicate ad-hoc charging prices and enable subscription-free standard card payments at all physical public chargers.** Final MSP price should always be displayed alongside the base ad-hoc price to prevent excessive MSP hidden price markups (e.g. roaming).
- **Centralise public charging data through the Common European Access Point (CEAP)** to harmonise EU-wide and open data collection of public chargers.
- **Establish EU-level indicators and regular monitoring of public charging prices of CPOs and MSPs,** to help national authorities distinguish between normal market variation and pricing differences requiring closer scrutiny.

1. EV public network coverage in Europe

The EU public charging network has expanded rapidly over the past years, ahead of strong electric car sales growth in 2025 and 2026. There were [1.1 million public chargers](#) in the EU by the end of 2025, five times more than in 2020. During the same time period, the number of battery electric cars on the road was [multiplied by 7](#). The EU charging network's growth is set to continue, reaching [2.1 million chargers in 2030](#).

The [Alternative Fuels Infrastructure Regulation](#) (AFIR) has been instrumental to this growth. To ensure charging infrastructure and BEV uptake grow hand-in-hand, AFIR includes fleet-based targets. More specifically, national public charging power output must grow by 1.3 kW for every BEV registered (and by 0.8 kW for every plug-in hybrid). AFIR fleet targets are [exceeded by over 180%](#) for the EU as a whole. As of June 2026, 26 out of 27 EU countries met their fleet-based AFIR targets and 23 more than doubled the charging power required.

The AFIR also requires fast public chargers (150 kW or more) to be installed every 60 km along the EU's main roads, also known as the TEN-T Core and Comprehensive networks. By June 2026, 79% of the TEN-T Core network met the 2025 AFIR's Light-Duty vehicles (LDV) target and 64% of EU's TEN-T Comprehensive network already complies with the 2030 target. See T&E's charging [dashboard](#) for country-level charging coverage progress.

Currently AFIR targets for the TEN-T Core and Comprehensive networks must remain the priority, as they provide the backbone for a harmonised EU-wide charging network and enable seamless long-distance travel. Beyond these requirements, the European Commission could consider introducing sub-national targets to ensure adequate public charging coverage within national territories, provided they reflect local public charging demand. Such targets should account for factors including access to home and workplace charging (access to home-charging remains the most convenient and [affordable](#) way to charge BEVs), traffic flows, local BEV uptake, population density, and tourism. AFIR must avoid imposing excessive infrastructure requirements that would result in underutilised charging points and hinder the development of a mature business-driven public charging market.

2. Foster price comparability and transparency

AFIR has improved transparency requirements for public charging, but important gaps remain. Consumers still face complex price structures, unclear mark-ups and inconsistent access to payment methods, limiting their ability to compare prices and use public charging freely. Further harmonisation is needed to ensure transparent, fair, and accessible charging across the EU.

2.1 Standardise and clearly communicate price components

Public charging prices often combine several components, including energy price, time-based charges, fixed session fees, and occupancy fees. In most cases, drivers do not know in advance how much they will pay and how the price is structured. This lack of transparency can lead to surprises as the price difference at a same public charger often falls [between €0.40/kWh and](#)

[€1.00/kWh](#), sometimes even going up to €1.40/kWh according to sampling by FIER (see upcoming T&E-BEUC study by FIER). Even when the different price components are disclosed individually, consumers still struggle to understand the final price or compare offers across charging stations. Dynamic charging prices can further increase this complexity.

Complex and non-standardised pricing structures hinder price transparency, affecting customers' trust and making it difficult for them to compare, verify, or challenge prices, leaving the door open for hidden mark-ups, unexpected charges, and other pricing distortions.

T&E calls to:

- **Standardise and limit public charging prices to three components:** charging price (€/kWh), Charging Point Operators (CPOs)-set standardised idle or overstay fee (applying once charging ends), and any roaming or other commercial fees charged by Mobility Service Providers (MSPs).
- **Clearly display all price components, conditions, and refund timelines before each charging starts**, including pre-authorisation and overstay fees, in a standardised format.
- **Require a standardised digital receipt to be provided within 24 hours of each session**, detailing all price components.
- **Display reference charging session cost estimates before each session**, to facilitate pricing estimates and comparison. Estimates should reflect updated prices for standard charging sessions (e.g., 10 kWh, 20 kWh, 40 kWh, or 50 kWh).
- **Introduce a price cap for dynamic tariffs**, requiring operators to clearly communicate a maximum price before each charging session. Once the charging session begins, the price cannot exceed this cap.

2.2 End price distortions and other opaque mark ups

While AFIR prohibits unjustified discrimination by CPOs, it does not require transparency on final prices charged by MSPs, including wholesale roaming charges or intermediary mark-ups.

As a result, a similar charging session at the same charge point can result in significantly different prices depending on whether the user pays via CPO or MSP, without being able to understand or verify the reason for the difference. For instance, upcoming joint study by BEUC and T&E study carried out by FIER highlights that at a Shell charge point near Muiden, a 51.40 kWh session accessed and paid directly to the CPO cost €12.81, while a nearly identical session of 53.65 kWh using a Freshmile MSP card cost €45.90 at the same charger. Austrian EV drivers [explicitly reported](#) accidental price premiums of 200% to 400% simply due to swiping the "wrong" app, card, or payment route at a station.

MSP pricing distortion is exacerbated by the frequent inclusion of additional non-energy fees. Time-based fees are present in [77% of MSP tariffs, compared with 22% of CPO tariffs](#), while parking fees are charged in [90% of MSP tariffs but only 13% of CPO tariffs](#).

T&E calls to:

- **Require the final MSP price to be displayed alongside the base ad-hoc price (before the charging session)**, allowing users to better identify MSP hidden price markups, including roaming fees, and to select the most affordable option.
- **Ensure drivers can easily access a price comparison between charging stations and operators within the MSP application** ahead of the session.
- **Introduce a cap for excessive roaming fees** to prevent excessive price increases (e.g., maximum 25-50% of the base ad-hoc price). Capping these MSP 'back-end' fees would help protect customers against opaque or disproportionate markups, including for situations when drivers use company-issued MSPs cards and employers - rather than drivers themselves - bear the costs of higher roaming fees - creating a split incentive.

2.3. Base ad-hoc price: clearly communicated and easy to pay

European EV public charging users rely on a variety of charging apps and payment methods (e.g., mobile applications, refueling cards, and bank cards). Few users rely on a single payment method: 20% of EV drivers in the EU have [at least five charging apps](#) on their phones and the same survey shows that 25% have at least five different refueling cards. Furthermore, at [more than nine out of ten charging stations](#), consumers cannot pay with their own debit or credit card, limiting payment choice and convenience.

Ad-hoc charging allows BEV drivers to charge without requiring a subscription, app account, or contract with a charging provider. If AFIR specifies that ad-hoc charging does not require prior registration, the absence of clear definitions and restrictions results in inconsistent implementation, with instances where downloading apps or creating an account is required to access ad-hoc charging.

Restricting ad-hoc charging access by requiring registration (e.g. downloading an app or creating an account) and limiting ad-hoc price visibility reduces price transparency, discourages competition, and contributes to higher public charging costs and lock-in effects.

T&E calls to:

- **Ensure standard card payment to all public charging points**, to ensure simple, consistent, and universally accessible public charging payment.
- **Implement standard card payment terminals requirement on all DC public charging points**, to ensure simple, consistent, and universally accessible public charging payment.
- **Clarify ad-hoc charging requirements**, by explicitly stating that ad-hoc charging access must not require prior registration, app download, sign-in, or contract.
- **Clearly indicate ad-hoc charging prices at physical chargers**, as missing information pushes drivers towards apps and may result in subscriptions locks-in.
- **Develop an EU guidance on "reasonable prices" and "comparability" clauses on public charging price**, to protect consumers from abusive ad-hoc or subscription price markup.

3. Open & transparent public charging data

Transparent, reliable, and interoperable data exchange is essential for a well-functioning public charging market. Consumers, MSPs, and route-planning services all depend on accurate and timely information on charger availability, prices, and status. Ensuring this information is collected and accessible across the charging ecosystem is key to improve the charging experience and market.

3.1 Robust and real time charging price information

AFIR requires the charging price to be available before the session starts, but it does not ensure that price changes are accurately communicated and reflected across the entire chain. That means that while the price shown at the charger or in the CPO system may be up-to-date, the price changes may not be immediately reflected across MSP apps, QR-code journeys, public Application Programming Interfaces (APIs), or navigation tools. If MSPs and route-planning services do not receive up-to-date and reliable data, users risk starting a charging session with incomplete or outdated price information, leading to bill-shocks after charging is completed.

Robust and timely communication protocols and requirements are needed to navigate these complex and multi-layered chains and ensure the CPO's back-end information remains accurate by the time it reaches the end user's device.

T&E calls to:

- **Introduce a maximum 15-minutes end-to-end latency for public charging data**, ensuring updates are accurately reflected to user-facing services within this timeframe.

3.2 Common European Access Point (CEAP): a single EU gateway for all charging data

Centralising and standardising public charging infrastructure data is essential to improve data accessibility, reduce administrative, corporate burden, and provide a comprehensive overview of the EU charging network. While AFIR requires CPOs to share static and dynamic data to National Access Points (NAPs), fragmented national data requirements, formats, and NAPs extraction procedures makes compliance burdensome and limits data usability. These reporting and data extraction requirements should be at minimum harmonised to enable consistent reporting and analysis across EU countries.

Gathering data directly at EU level would significantly reduce technical complexity and administrative costs. By contrast, the current AFIR approach - first collecting data nationally and then collecting at EU level - creates obstacles, particularly for dynamic data that must be accurately transmitted and updated across multiple layers.

T&E calls to:

- **Centralise public charging pricing data through an Common European Access Point (CEAP)**, to facilitate harmonised EU-wide and open collection of public charging data.
- **Make Common European Access Point (CEAP) information publicly accessible** to provide an open EU-wide overview of charging infrastructure data and publicly.

4. Better and easier monitoring

4.1 Standardise National Policy Frameworks

Compliance with AFIR's reporting obligation remains limited, with some Member States having neither adopted nor submitted their National Policy Frameworks (NPFs), despite the December 2025. Moreover, the drastic difference in methodology and information provided in the available NPFs makes it difficult to compare Member States' progress and assess the EU's overall progress in charging infrastructure roll out.

As NPFs are a key tool to monitor Member States progress and future plans, reporting requirements should be standardised to reduce Member States administrative burdens and costs while improving the usability of the data collected. NPF should collect input on: expected Zero Emission Vehicles (ZEV) (by category type), total funds dedicated to support ZEV vehicle uptake (categorised by alternative fuel type), ZEV charging infrastructure (categorised vehicle category and alternative fuel) and other measures planned nationally to meet AFIR's targets. These should be clearly formulated based on the location (e.g., TEN-T core, TEN-T comprehensive, urban nodes) and AFIR targets (2025, 2027 and 2030).

T&E calls to:

- **Develop a National Policy Framework (NPF) template**, prepared by the European Commission, to reduce Member States administrative burden and costs and improve data quality and comparability.
- **Harmonised national reporting data** through a common set of charging indicators and data requirements, easing Member States reporting exercise and enabling a clearer EU-wide overview of public charging infrastructure.

4.2. Better understanding and monitoring of public charging prices

Public charging prices currently range from around [€0.36/kWh to €1.17/kWh](#), which may sometimes raise concerns about affordability, trust, and the overall business case for driving an EV. While AFIR requires public charging prices to be 'reasonable', it provides no practical framework to distinguish between normal market variation and pricing practices that warrant closer scrutiny. If charging price differences can be justified by factors such as charging power, utilisation, grid costs, location, or service quality, public charging price variations should reflect the actual costs of providing public charging.

Common EU indicators would help national authorities identify persistent pricing outliers, unexplained differences between access methods, and systemically higher prices through particular payment channels.

T&E calls to:

- **Establish EU-level indicators and regular monitoring of public charging prices of CPOs and MSPs**, to help national authorities distinguish normal market variation from pricing differences that require closer scrutiny.
- **Develop common EU monitoring templates** to ensure consistent oversight across Member States. For example, FIER recommends looking at indicators such as public-to-home charging price ratios, price differences between ad-hoc, subscription, and roaming routes, same-site price-gap indicators, roaming- price spread, and complaint or bill-shock metrics based on receipt data.

5. Unlock bidirectional charging

Electric cars offer a growing source of storage and flexibility potential today and in the future and could save the EU energy system [€22 bn a year by 2040](#). AFIR already lays solid basis for smart and bidirectional charging, by mandating ISO 15118-20 by 2027 and requiring Member States to report how the roll-out of charging infrastructure - both private and public - contributes to increased flexibility and renewable electricity share in their electricity system. However, these provisions can still be finetuned to accelerate the adoption of smart (V1G) and bidirectional (V2G) charging.

To enable V2G at scale, EVs should be equipped with onboard smart and bidirectional charging by mandating via the EU's vehicle-type approval procedure (see [T&E briefing](#)). Locating the bidirectional converter in the vehicle will significantly reduce the costs of deploying V2G by enabling lower-cost bidirectional chargers, provided supporting harmonised charging ecosystem is developed.

T&E calls to:

- **Define the mandatory requirements of a bidirectional charge point**, mandating compliance with RfG grid code 2.0 ([adoption](#) foreseen by Q4 2026) and integration of ISO 15118-20 Bidirectional Power Transfer and Dynamic Smart Charging features, needed to unlock the full potential of ISO 15118-20 compliance in chargers.
- **Establish harmonised EU testing standards for bidirectional chargers** covering both ISO 15118-20 communication feature and grid interaction requirements (under RfG Grid Code 2.0), ensuring consistent implementation across the EU.
- **Include reporting and incentives for smart and bidirectional use in national reporting obligations** to monitor not only charger smart and bidirectional capabilities but also the policies enabling their uptake, such as dynamic electricity tariffs.

6. A methodology that better reflects EU's public charging

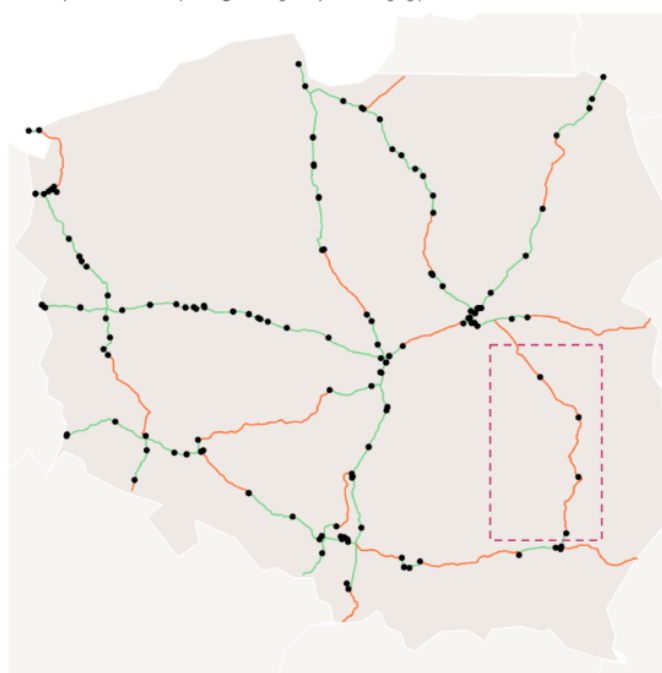
AFIR considers a road segment compliant only when two public charging pools are no more than 60 km apart. As a result, if two compliant chargers are slightly beyond that threshold, they will be excluded from coverage calculations entirely.

This approach can significantly distort compliance assessments. For example, in Poland, multiple roads such as the S19 to E372 - highlighted in the map- are completely excluded from calculations despite having charging pools just slightly beyond the 60 km threshold.

To better reflect actual charging availability, AFIR methodology should assess the coverage provided by each compliant charging pool rather than only the distance between two consecutive compliant charging pools. This would [increase estimated TEN-T Core compliance](#) with AFIR distance targets for light-duty vehicles from 79% to 93%.

June 2026 TEN-T Core network

Compliant Not compliant Existing compliant charging pool



T&E modelling based on Eco-Movement data

T&E calls to:

- **Measure TEN-T charging coverage from each compliant public charger (30 km in each direction),** rather than between two compliant public chargers 60 km apart, to better reflect actual charging coverage.

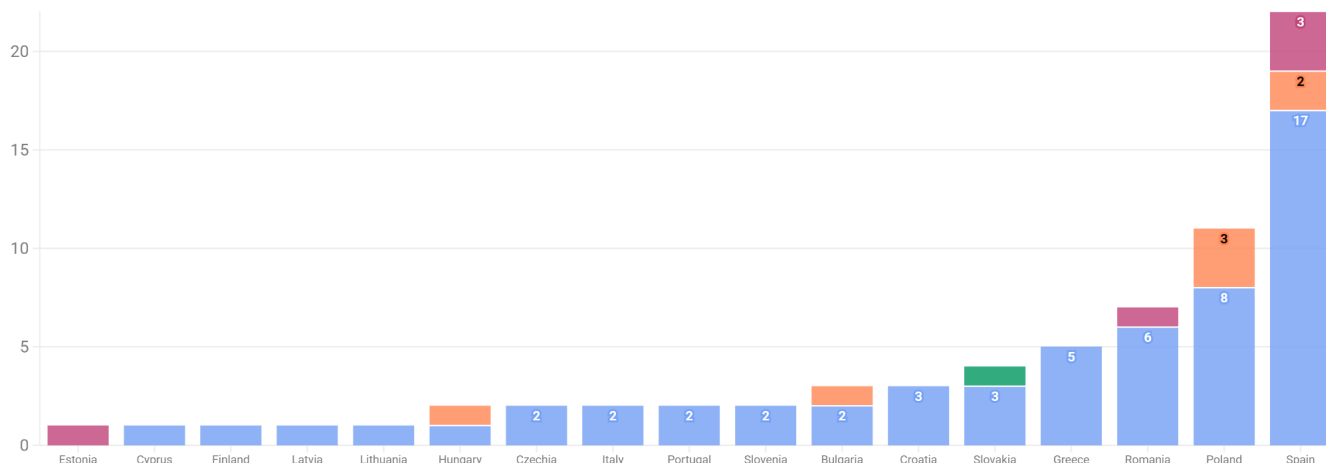
7. Strategic Alternative Fuels Infrastructure Facility (AFIF) deployment

While the EU's public charging infrastructure has been extensively growing, some gaps remain in Southern, Eastern and Central Europe. These gaps can be rapidly closed through targeted infrastructure upgrades and funding. Indeed, over 90% of 2025 AFIR distance-based targets can be achieved by focusing on [70 strategically located EV charging pools](#) (22 in Spain, 11 in Poland and 7 in Romania). Most of these sites already exist and only require upgrades to comply with AFIR.

90% TEN-T Core (2025 target) possible by upgrading 69 charging pools and 1 new build

New or upgraded charging pools to reach 90% coverage

■ Upgrade: pool has at least one 50kW DC charger ■ Upgrade: pool already >300kW ■ Upgrade: pool already >400kW - only needs hardware ■ New build



T&E modelling based on Eco-Movement data.

T&E calls to:

- **Prioritise public charging pools upgrade located in strategic areas at national level, to accelerate AFIR compliance and BEV uptake conditions.**
- **Renew [AFIF funding](#) and dedicate funds at EU level to upgrade strategic EV chargers.**

Further information

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