

**UPEI CONTRIBUTION TO
EUROPEAN COMMISSION CALL FOR EVIDENCE
“ALTERNATIVE FUELS - REVIEW OF EU RULES ON INFRASTRUCTURES.”**

Brussels, 16 April 2026.

UPEI, the voice of Europe’s independent energy and mobility suppliers, has carefully read the call for evidence, published on 23 March 2026, inviting for an input on “Alternative Fuels - review of EU rules on infrastructures”, ahead of a review and possible revision of the AFIR - (Regulation (EU) 2023/1804).

This is a preliminary answer, as the timing chosen (middle of one of the most acute crises faced by our sector since 1973) and the timeline (four weeks) did not give us much time to prepare more arguments. We will attempt to provide a more detailed answer to the public consultation once it has been published.

Building on our previous position papers, notably on the call for evidence on the Amendment Proposal to the European Climate Law and on our position papers of 26 October 2021 and 21 March 2022, UPEI proposes considering the following points, constantly keeping the link between ambition, market reality, and investment conditions:

The revision should aim at:

1. Providing a coherent, stable, and forward-looking legislative framework.
2. Amending current legislation only to the extent that it is necessary to implement the revised European Climate Law’s intermediary target of 90% by 2040.
3. Promoting an honest and full implementation of the technology neutrality principle, notably as regards infrastructure planning, methodological choices (e.g. primary energy factors), and regulatory design.
4. Combining policy ambition and practical achievability, considering the availability of renewable fuels, infrastructure constrains, technology maturity and realistic scaling times.
5. Considering flexibility mechanisms to address temporary imbalances between targets and market realities.
6. Building a diversified and resilient energy system that addresses the short, medium, and long-term geopolitical dimension by strengthening the role of renewable fuels, including liquid fuels, for resilience and security of supply.

Furthermore, the European Commission should:

7. Better recognise existing fuel distribution and retail infrastructure as vectors of cost-efficiency improvement and deployment accelerators and key enabler of the EU energy system.

8. Guarantee stable and predictable investment conditions, ensuring that operators and investors should not bear risks stemming from external constraints such as grid connection delays, permitting bottlenecks or upstream supply limits.
9. Base the new revision on a proper evaluation of the AFIR implementation at national level, which as such is a major issue since it only became applicable two years ago (13 April 2024) and requires major investments.
10. Maintain a large definition of renewable fuels, which could be the definition of CO₂-neutral fuels of the Report of the Working Group on Monitoring Methodologies (WGMM)¹.
11. Adapt the Regulation to ensure an alignment between supply- and demand-side measures and avoid the artificial development of a refuelling infrastructure that is not economically viable nor accompanied by a relevant consumer demand. Overly rigid or prescriptive targets may lead to underutilised infrastructure, inefficient capital allocation and increased costs for operators and consumers.
12. Further build the EU energy internal market by harmonising fuel standards and blending limits, setting up interoperability and user-friendly systems.
13. Include specific requirements for hydrogen infrastructure, which technological and market development is significantly uncertain for at least the next decade; the revised Regulation should contain the provision of substantial policy support and EU-funding. In any case, the uptake of hydrogen will highly depend on the availability of vehicles. current lack of vehicles, as well as the high investment costs.
14. As regards LNG, overcome all administrative barriers that prevent its deployment.
15. Ensure that obligated parties to electricity infrastructures should not be penalised in cases where sufficient electricity supply is not available.

Finally, based on our [position paper](#) of 11 February 2021 the proposal should:

16. Keep practical the provisions on electric charging infrastructures' costing and payment, allowing independent players and first movers to compete fairly, and should not harm first movers.
17. Provide for the development of online tools and campaigns to inform consumers as part of Member States' measures to support the uptake of alternative fuels (i.e. demand-side measures).

UPEI would highly appreciate the opportunity to discuss these points in a meeting at your best convenience and remains at your disposal to provide more detailed information.

ABOUT UPEI

[UPEI](#) represents nearly 2,000 European importers and wholesale/retail distributors of energy for the transport and heating sectors, supplying Europe's customers independently of the major energy producers. They are the interface between producers

¹ "CO₂-neutral fuel' means all fuels defined by the Renewable Energy Directive (EU) 2018/2001, provided that they meet the sustainability criteria of that Directive and its delegated acts, where the same amount of CO₂ from biomass, ambient air or recycled carbon sources is bound in fuel production as is released during combustion in the use phase. These fuels include renewable and/or synthetic fuels such as biofuel, biogas, biomass fuel, renewable liquid and gaseous transport fuels of non-biological origin (RFNBOs), and recycled carbon fuels (RCFs)."

and consumers, using their own infrastructure and flexibility to supply existing demand for conventional and low carbon liquid fuels, as well as non-liquid alternatives as part of the energy transition. They cover more than a third of Europe's current demand.

The organisation brings together national associations and suppliers across Europe. Independent energy and mobility suppliers bring competition to Europe's energy market and are able to respond rapidly to changes affecting supply, contributing to security on a local, national, and regional level. They have developed and maintain a comprehensive infrastructure for the sourcing, storage and distribution of transport and heating fuels, with a commitment to delivering a high-quality service to all consumers, including those in remote areas.

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