



Mastercard's Position on the Revision of the Alternative Fuels Infrastructure Directive

As a technology company and a global leader in electronic payments, Mastercard recognizes the importance of the Alternative Fuels Infrastructure Directive ("AFID") for a sustainable Europe. We welcome the European Commission's review of the directive, as it should ensure further strengthening of the internal market, while also supporting Europe's Green Deal and its goals.

In our position document we would like to draw attention to certain provisions of the AFID and make suggestions on how to improve the AFID so that the payment component does not become a barrier to reaching a unified internal market and pan-European goals. We focus on electric vehicle charging, as it is a nascent infrastructure, where a lack of regulatory guidance could easily lead to fragmentation, effectively preventing free movement of European citizens and goods by means of electric vehicles.

For any infrastructure which relies on interactions and transactions with consumers, the payment component is crucial in ensuring fast adoption and wide usage. In the specific case of electric vehicle charging, the payment component could indeed become a great barrier to cross-border travel and transport, and to proliferation of electric vehicles in general, if there were a lack of a low-barrier, pan-European payment solution in place.

We understand that the AFID, in its current form, does call for "universal" solutions, when in point 9 of Article 4 it states that: *"All recharging points accessible to the public shall also provide for the possibility for electric vehicle users to recharge on an ad hoc basis without entering into a contract with the electricity supplier or operator concerned."* However, in practice, this has still not resulted in a European electric vehicle charging network with a low-barrier and pan-European payment solution in place, thus still posing limitations to seamless and frictionless European travel and transport with electric vehicles.

We therefore call for a mandate through AFID, to require operators of recharging points accessible to the public to implement low-barrier, pan-European payment solutions in their infrastructure. Taking into consideration the current payment landscape, and the need for cross-border interoperability with a frictionless user experience and high degree of scalability, Mastercard advocates for a card-based, open-loop solution, which does not require consumers to register for the electric vehicle charging service.

Being an enabler of frictionless and secure digital payment transactions across the globe, Mastercard is open to a further dialogue on how we can support the creation of a European electric vehicle charging infrastructure, with easy access for all European citizens and businesses.