

Position Paper on the 2026 AFIR Review

Contribution to the European Commission Public Consultation on the Review of EU rules on alternative fuels infrastructure

Core message: AFIR's binding 2030 hydrogen backbone should be maintained. The review should concentrate on making implementation investable and operationally fit for heavy-duty vehicles: stations must work for trucks in real use, capacity must be measurable, deployment must connect infrastructure with vehicles, renewable-hydrogen supply and, where compatible, wider regional and industrial hydrogen logistics, and permitting and funding must support timely delivery.

This background paper accompanies WIVA P&G's response to the European Commission's public consultation on the review of Regulation (EU) 2023/1804. It focuses on the issues most material to WIVA P&G and the H2 AFIR Ready project: hydrogen refuelling infrastructure for road transport, especially heavy-duty vehicles, and the practical conditions for implementing Article 6 in Austria and across borders.

1. About WIVA P&G and this contribution

WIVA P&G is an Austrian research and innovation association supporting hydrogen and renewable-gas technologies across production, infrastructure, storage and end use. It coordinates the Austrian flagship region as well as the Hydrogen Valley HI2 and connects industrial and scientific partners in Green Energy, Green Industry and Green Mobility. From this Austrian implementation perspective, WIVA P&G contributes to the AFIR review with a focus on a reliable European hydrogen refuelling backbone and the conditions required to make it usable for heavy-duty road transport.

2. General position

WIVA P&G supports maintaining the binding 2030 hydrogen refuelling backbone established by AFIR. A European minimum network is necessary to overcome the coordination gap between fleet operators, station developers and hydrogen suppliers. Reopening the basic network obligation, generally postponing the targets or introducing broad demand-based derogations would increase investment uncertainty and reinforce the chicken-and-egg problem.

The review should instead convert nominal compliance into reliable service capability and coordinated investment. WIVA P&G therefore recommends five targeted improvements: preserve the 2030 backbone; define real heavy-duty vehicle capability; clarify deliverable capacity and interoperability; coordinate stations, vehicle fleets, renewable-hydrogen supply and compatible regional and industrial hydrogen logistics; and accelerate permitting, funding and transparent implementation while establishing an indicative pathway beyond 2030.

3. Austrian implementation perspective

Austria illustrates both the necessity of a binding European framework and the difficulty of translating regulatory targets into investable projects. Austria's 2024 National Policy Framework recorded four publicly accessible hydrogen refuelling stations in August 2024, located in Asten, Graz, Innsbruck and Wiener Neudorf. These sites constituted the remaining public OMV hydrogen-refuelling network. None complied with the AFIR requirements: only three offered 700-bar refuelling and none was designed for a cumulative minimum capacity of 1 tonne of hydrogen per day.

In 2025, OMV closed its public hydrogen-refuelling network in Austria. As of January 2026, the Austrian Federal Government reported that no publicly accessible hydrogen refuelling station was in operation and that no new openings were known. Partner-based facilities exist, notably Wien Energie's 350-bar and 700-bar stations in Leopoldau and Simmering, but access is restricted to partners and they therefore do not constitute publicly accessible infrastructure within the meaning of AFIR.

The Austrian National Policy Framework identifies a requirement for nine stations at the country's urban nodes and potentially one additional station along the A2 corridor between Vienna and Graz. It also projects a national fleet of up to 480 hydrogen trucks by the end of 2030. Austria must therefore build its AFIR-compliant public hydrogen-refuelling network essentially from the ground up.

This development sharpens the coordination and investment challenge that AFIR is intended to address. Fleet operators require reliable refuelling infrastructure before committing to hydrogen vehicles at scale, while station developers require credible fleet commitments, secure and competitively priced renewable-hydrogen supply, and predictable public support before taking final investment decisions. The closure of the previous network should not be interpreted as evidence that a European hydrogen backbone is unnecessary. Rather, it demonstrates that isolated, predominantly passenger-car-oriented stations without anchored demand and genuine heavy-duty capability do not provide a viable basis for implementing AFIR.

The H2 AFIR Ready project addresses this implementation interface by assessing demand, location requirements at urban nodes and TEN-T links, logistics centres and ports, renewable-hydrogen availability, the practical meaning of the 1 tonne/day threshold and the roles of 350 bar, 700 bar and liquid hydrogen. AFIR should allow such evidence to guide exact siting and modular station design while preserving the minimum cross-border network.

4. Preserve the binding 2030 hydrogen backbone

The current Article 6 targets are the minimum credible basis for coordinated European investment. A general extension, weaker coverage obligation or broad demand-based derogation would undermine the investment signal and delay the formation of a cross-border market. The binding targets for urban nodes and the TEN-T core network should therefore be retained and should not generally be postponed or weakened.

Targeted flexibility may be appropriate for exact siting and staged modular construction, but only where cross-border coverage, public accessibility, operational performance and a binding expansion pathway are preserved. Flexibility must improve implementation without turning a common European backbone into a collection of optional national projects.

5. Make compliance operationally fit for heavy-duty vehicles

Nominal daily capacity and the presence of a dispenser are not sufficient. A station counted towards the AFIR targets should be demonstrably usable by the intended vehicle classes. The implementing framework should cover:

- **Safe truck access.** Provide suitable entrance and exit geometry, turning radius, clearance, queuing and circulation for articulated vehicles.
- **Predictable refuelling performance.** Specify refuelling time and state of fill, including performance during consecutive or back-to-back refuelling events.
- **Deliverable throughput.** Assess output over defined peak periods rather than relying only on storage volume or theoretical 24-hour production.

- **Availability and resilience.** Set expectations for minimum availability, redundancy, hydrogen-supply resilience and transparent outage information.
- **Modular scalability.** Ensure that storage, compression, dispensing and site layout can be expanded efficiently as demand grows.

6. Clarify capacity while preserving interoperability and technology openness

The term 'minimum cumulative capacity' should mean hydrogen that can actually be dispensed under defined operating conditions. The daily value should be complemented by a peak or hourly performance metric reflecting the need to refuel multiple trucks within short operational windows. Common test procedures and independent conformity assessment should verify the declared capability.

New heavy-duty focused sites should include interoperable 700-bar capability suitable for trucks. Existing 350-bar applications should remain usable, and liquid-hydrogen solutions should be enabled where traffic, fleet commitments and technical maturity justify them. AFIR should avoid requiring every site to provide every technology. European and international standards should be updated without creating retroactive uncertainty for projects that have already reached final investment decision.

7. Coordinate vehicles, stations, industrial demand and renewable-hydrogen supply

The binding TEN-T and urban-node backbone should be combined with demand-oriented ecosystem planning around logistics hubs, industrial clusters, hydrogen valleys, ports and committed fleets. This can improve early utilisation without replacing the geographic minimum. Member States should coordinate locations across borders and involve fleet operators, road operators, hydrogen producers and logistics providers, industrial hydrogen users, local authorities and emergency services at an early stage.

Beyond mobility, the deployment of AFIR stations can strengthen the reliability and cost-effectiveness of the wider hydrogen supply system during market ramp-up. A growing network of geographically distributed refuelling sites increases the number of hydrogen demand and delivery points and can support shared logistics between production, mobility and industrial applications. Where hydrogen quality, pressure levels, transport concepts, storage and operational interfaces are compatible, such a network can create alternative supply routes, improve system-wide availability and reduce the need for costly local redundancy solely to secure high availability. AFIR implementation should therefore be coordinated with regional hydrogen infrastructure and industrial supply planning, while safeguarding the stations' primary function for road transport.

EU and national support instruments should:

- **Support integrated deployment packages.** Combine publicly accessible stations, committed vehicle fleets, renewable-hydrogen supply and, where appropriate, industrial hydrogen users in coordinated projects.
- **Enable compatible shared hydrogen logistics.** Support interoperable interfaces and logistics concepts that allow hydrogen production, mobility infrastructure and industrial demand to reinforce each other, improve supply resilience and reduce avoidable local redundancy.
- **Enable efficient upgrades.** Make technically sound upgrades of existing stations eligible where they are more efficient than greenfield construction.
- **Support modular ramp-up.** Provide proportionate, transparent and time-limited support for expansion during periods of low initial utilisation.

- **Provide a dependable funding horizon.** Coordinate CEF/AFIF, national funding and State-aid instruments over a predictable multiannual period without duplicative RFNBO certification requirements.

8. Accelerate implementation, improve data and signal the post-2030 pathway

Member States should establish coordinated one-stop procedures for hydrogen refuelling projects and clarify responsibilities among land-use, road, energy, environmental, construction and emergency authorities. Common EU guidance, application templates and training would reduce inconsistent interpretations while maintaining rigorous safety requirements.

Hydrogen-specific data should be harmonised through National Access Points and EU-level services. Essential information includes pressure level, refuelling protocol, compatible vehicle classes, maximum quantity per fill, deliverable and peak capacity, number of dispensers, operational status, fuel availability, outages and price. The Commission should monitor permits, final investment decisions, construction, commissioning, capacity, availability and cross-border gaps without duplicating national reporting.

Because infrastructure and fleet investment cycles extend beyond 2030, AFIR should also provide indicative planning milestones for 2035 and 2040, reviewed against market evidence. Further densification, redundancy and technology deployment should follow verified traffic and utilisation, while sites built before 2030 should reserve the space and interfaces needed for efficient expansion.

9. Conclusion and recommendation

WIVA P&G recommends that AFIR remain the dependable European backbone for zero-emission mobility. For hydrogen, the response to implementation difficulties should not be lower ambition, but a more usable, investable and coordinated framework. Maintaining the 2030 targets, defining real heavy-duty service capability, clarifying deliverable capacity, coordinating infrastructure with fleets, renewable-hydrogen supply and compatible industrial hydrogen logistics, and accelerating permitting and funding would turn the regulatory target into a functioning cross-border network. During market ramp-up, this coordinated network can also strengthen the availability and resilience of the wider hydrogen system and reduce the cost of achieving high local supply reliability through isolated redundant solutions.

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Sources

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3. BMIMI - National Policy Framework for Austria (2024) - public hydrogen-refuelling station status in August 2024, AFIR-compliance assessment, 2030 infrastructure needs and vehicle projection.
4. OMV and Austrian public reporting (2025) - closure of the public OMV hydrogen-refuelling stations in Asten, Graz, Innsbruck and Wiener Neudorf.
5. Austrian Parliament - 987th sitting of the Federal Council, 12 March 2026 - no publicly accessible hydrogen refuelling stations in operation or new openings known as of January 2026.
6. Wien Energie - hydrogen-refuelling stations in Leopoldau and Simmering; access restricted to station partners.
7. BMIMI / Hydrogen Partnership Austria - 5th Round Table, 20 April 2026 - Austrian funding context and strategic hydrogen-network analysis.
8. Hydrogen Europe - Sharpening AFIR: recommendations for the review - heavy-duty vehicle capability, post-2030 planning and funding.
9. H2Accelerate - AFIR position statement - joint station-and-fleet deployment and investment certainty.
10. WIVA P&G - Association and flagship region - organisational profile.