



Standardized Payment Options at Charging Stations throughout Europe

Position paper of the Initiative Deutsche Zahlungssysteme e.V. (German Payment Systems Initiative) regarding the proposal for the Regulation "Low-emission vehicles - improving the EU's refuelling/recharging infrastructure" of the European Parliament and the Council.

The Initiative Deutsche Zahlungssysteme e.V. welcomes the EU Commission's proposal for a Regulation on the development of an Alternative Fuels Infrastructure (AFIR) to ensure a coherent and consumer-friendly charging infrastructure in Europe.

The transport sector and the electrification of the individual transport are crucial for achieving the Paris climate goals. To enable consumers to switch to electric cars a well-developed charging infrastructure with easily accessible, secure and standardized payment options at every charging station are particularly important. Citizens of the European Union should be able to move around Europe with their electric car without major restrictions. The Initiative Deutsche Zahlungssysteme e.V. therefore welcomes the proposal for a regulation on the development of an alternative fuels infrastructure.

A modern charging infrastructure throughout Europe ensures that consumers can easily charge their electric cars and that fees are transparently displayed. Nevertheless, the Initiative Deutsche Zahlungssysteme e.V. sees the need for improvement regarding the current proposal and therefore demands the following:

- ➔ Broad access to public charging infrastructure with contactless payment methods widely used in Europe, such as debit and credit cards, must be enabled and included - regardless of whether it is a plastic card or the digital equivalent in a smartphone.
- ➔ Ad-hoc charging must not depend on closed loop payment solutions offered by charging station operators and electricity providers.
- ➔ Consumers should be able to pay with debit or credit cards at all public charging stations in the EU from 2023 onwards.

Recommendation of the Initiative Deutsche Zahlungssysteme e.V.:

Art. 5 (2): The option of card payment should also be mandatory for slow charging stations with a capacity of less than 50 kW. Card payment by debit or credit cards is a very established payment method and broadly accepted in the retail sector throughout Europe.



No exception should be made for any charging station. The obligation for card payment options should therefore be extended on slow charging points too. According to the current proposal, operators of charging points with a capacity of less than 50 kW may optionally offer a QR code that can be used for the payment process. In our view, this is not a consumer-friendly solution as these systems are error-prone and often not barrier-free. Additionally, QR codes are also more insecure as users must register online with highly sensitive data.

To enable consumer-friendly payment options without any discrimination at charging stations in the European Union, publicly accessible charging stations should be obligated to offer a payment option by card. Furthermore, card payment is internationally widespread and secure. In total, there are around 585 million issued debit cards and around 113 million issued credit cards in the EU as of 31/12/2020.¹ This means that consumers will not be excluded even if they do not have a smartphone. Moreover, payment remains possible with limited mobile network reception. A debit or credit card can be used to pay directly at a payment terminal without an internet connection, registration, or login. It is irrelevant whether the debit or credit card is a plastic card or a digital version in a smartphone. The technical processing always takes place directly between the card and the terminal at the point of sale.

Internet-based payment options are no alternative to the widely accepted and established debit and credit cards with their high security standards. After all, payment at publicly accessible charging stations must be just as simple and secure as payment at established petrol stations. A payment chaos consisting of apps, RFID charging cards, and credit accounts is slowing down the transition to electric vehicles and leads to uncertainty among consumers - especially regarding cross-border traffic. For the acceptance and expansion of electromobility, it is crucial to establish a coherent and widely accepted payment system at charging stations throughout the EU, without consumers having to inquire about national or local charging service providers beforehand.

- ➔ **The Initiative Deutsche Zahlungssysteme e.V. therefore demands that slow charging stations with a capacity of less than 50 kW must also offer a card payment option.**
- ➔ **Additionally, consumers should be able to pay with debit or credit cards accepted in the EU at all public charging stations in the EU from 2023 rather than 2027.**

These demands are supported by an online representative survey of car owners in seven selected European countries from November 2021.²

¹ Deutsche Bundesbank payment statistics for 2020 (excluding the United Kingdom); yet not published.

² This is an online representative survey conducted by infas quo GmbH among car owners (n=500 aged 18+) in six European countries from November 2021. The survey is currently unpublished and is expected to be published in December 2021.



A clear majority of the persons interviewed in Greece (91%), Poland (89%), France (89%), Slovenia (83%), the Netherlands (79%), Germany (78%), and Sweden (67%) would prefer to pay at the charging station either with their plastic debit or credit card or the digital version on their smartphone. In contrast, the preference for solutions such as RFID cards or charging apps as well as the option to pay via QR code is significantly lower: Sweden (25%), Germany (13%), Netherlands (13%), Slovenia (9%), France (7%), Poland (7%) as well as Greece (6%)³. The European legislator should take these survey values into account in its regulations.

German regulation on charging stations ([“Zweite Verordnung zur Änderung der Ladesäulenverordnung”](#)) as best practice for the EU

The expansion of electromobility is also on the political agenda in Germany. The German regulation on charging stations approved in September 2021 states that public charging points must enable payment by means of a common debit and credit card system from 2023 on. Charging points that offer card payments already record two-thirds more charging transactions than charging points with an app or QR code.⁴ This illustrates: Only card payments will pave the way to electromobility - via consumer-friendly, democratic, and payment options without any discrimination.

What has been achieved in Germany should not be withheld from EU citizens. EU citizens want to charge their electric vehicle spontaneously at any charging point in the EU without any additional contractual obligations. Furthermore, they want to be able to pay with a credit or debit card at all public charging stations in the EU from 2023 onwards. For this reason, the Initiative Deutsche Zahlungssysteme e.V. is campaigning for a consumer-friendly, secure and not exclusionary payment by debit or credit card along the lines of the German regulation on charging stations at all charging stations in the European Union.

For more information about the Initiative Deutsche Zahlungssysteme e.V. and our demands, please visit: <https://www.initiative-deutsche-zahlungssysteme.de/>

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³ The question is: "There are different ways to pay at a charging station. If you could choose freely, how would you prefer to pay at the e-charging station?"

⁴ [Focus Paper](#) Deutscher Sparkassen- und Giroverband (German Savings Banks Association, DSGVO)