

# Concept paper – Scoping European funding such as CEF AFIF for pan-European zero emission mobility

13<sup>th</sup> October 2026

This paper is part of a three-part H2Accelerate policy series:

- Paper 1 sets out the Member State policy packages currently effective to unlock hydrogen trucking in Europe.
- **Paper 2 presents a proposal for adapting existing European funding calls (such as CEF AFIF) to better support coordinated truck-and-station deployments as seen in Member States.**
- Paper 3 presents a TCO Parity Certainty Mechanism to unlock long-term TCO certainty and scaled investments into zero-emission H<sub>2</sub> trucking

## Executive Summary

A key challenge facing the hydrogen mobility sector is the need to coordinate the rapid scale-up of hydrogen refuelling infrastructure with the deployment of hydrogen-powered trucks. Certain Member States have introduced combined truck and station funding schemes to tackle this challenge. The Netherlands' SWiM programme and Germany's combined funding scheme provide joint capital support for vehicles and refuelling stations, helping to reduce risk for both fleet operators and infrastructure providers. Alongside robust RED III credit mechanisms and road toll exemptions for zero-emission vehicles, combined funding schemes are supporting a credible policy pathway to enable the growth of the hydrogen trucking sector.

At the European level, CEF AFIF has played an important role in supporting alternative fuels infrastructure, including hydrogen refuelling stations, by providing capital grant support. However, infrastructure funding alone will not guarantee that stations will be built or utilised where vehicle offtake has not been secured.

Members of the H2Accelerate collaboration propose that future CEF AFIF funding should be adapted to support joint hydrogen truck and station deployment, building on the structure being adopted by leading Member States. This will improve the effectiveness of public funding, accelerate the construction of refuelling infrastructure, and support the development of a commercially viable hydrogen trucking ecosystem across Europe.

## Member State schemes are demonstrating the value of combined truck-and-station funding

To rapidly scale the zero-emission road mobility sector in line with the trajectory of the HDV CO<sub>2</sub> standards, both hydrogen-powered and battery electric trucks are needed. ACEA estimates that between 70,000–85,000 FCEVs<sup>1</sup> must be deployed on Europe's roads to achieve the emissions reduction targets for 2030 (45% reduction compared to 2019/2020). To support these vehicles, a network of hydrogen refuelling stations must also be deployed, capable of supplying around 2.8–4.2 kt per day of hydrogen fuel.<sup>2</sup>

Scaling hydrogen-powered truck deployment and the underlying refuelling infrastructure is a key challenge of road mobility decarbonisation. HRS operators need sufficient fuel demand to justify investment, while truck operators need reliable access to refuelling stations before committing to purchase hydrogen trucks. **Coordinated deployment of both vehicles and fuelling infrastructure is needed to resolve these challenges.**

The H2Accelerate collaboration has advocated for joint CAPEX funding for HRS and hydrogen-powered trucks, alongside robust RED III credit mechanisms and road toll exemptions for zero-emission vehicles, since the collaboration's formation. Leading Member States are implementing targeted programmes providing joint truck and station funding. These programmes provide an important template for other Member States and for future EU-level funding programmes.

**Netherlands – Subsidy for Hydrogen in Mobility (SWiM).** Since 2024, the Netherlands has operated an annual SWiM funding programme, providing joint capital support for hydrogen refuelling stations and hydrogen-powered vehicles. Applicants must work together in a partnership that includes at least one hydrogen filling station operator and one transport or logistics company. Funding can support the construction, repurposing or upgrade of hydrogen refuelling stations, as well as the purchase or retrofit of hydrogen-powered vehicles and equipment. Across the first two rounds of SWiM, around 600 hydrogen-powered vehicles (including 500 N2 and N3 trucks) and 15 new or expanded stations were awarded funding from a budget of around €72 million.<sup>3</sup>

**Germany – Combi-funding scheme.** In January 2026, Germany launched a combined funding scheme for hydrogen refuelling stations and hydrogen-powered trucks.<sup>4</sup> The programme provides a total budget of €220 million and is designed to support the coordinated deployment of public hydrogen refuelling infrastructure for heavy-duty vehicles alongside the deployment of hydrogen-powered commercial vehicles. The combi-funding scheme was significantly oversubscribed, receiving bids totalling a combined funding request of over €455m and targeting a combined deployment of over 70 high capacity station and 455 vehicles and vehicle fleets<sup>5</sup>. Across both funding schemes, flexibility in project deployments and truck and station technologies is embedded. Both ZEV compliant H2-ICEVs and FCEVs, as well as multiple refuelling station technologies (including LH2, CHG, and combined liquid and gaseous hydrogen stations) can be funded. Consortia must involve station operators and vehicle end users. This structure drives collaborative projects between multiple stakeholders,

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<sup>1</sup> [ACEA – Fact Sheet CO2 standards for heavy-duty vehicles, February 2023](#)

<sup>2</sup> Assuming annual truck mileage of 120,000km/year, fuel efficiency of a FCEV ranging from 6 to 7.5kg/100km, operating days per year of 360 days, and station utilisation rate of 50%; 120,000km \* 6–7.5kg/100km = 7,200–9,000kg/yr; 360 days per year = 20–25kg/day; 50% station utilisation rate – Fuel consumption per truck = 40–50kg/day. For 70,000 trucks = 2.8–3.5kt, for 85,000 trucks = 3.4–4.2kt

<sup>3</sup> Public presentation by RVO, shared July 2026

<sup>4</sup> [NOW GmbH, January 2026](#)

<sup>5</sup> [BMV, 1 July 2026](#)

while providing the flexibility needed to achieve a viable ecosystem during the early years of development.

The grant funding provided in the Netherlands and Germany, in combination with supportive policy mechanisms, has been well-received by industry and resulted in concrete plans to offer hydrogen refuelling at competitive prices to diesel, and hydrogen trucks with full service and maintenance offerings. The correct enabling conditions can stimulate the development of hydrogen mobility ecosystems.

## Combined funding schemes can offer more effective project deployments than siloed schemes

To date, European funding has been siloed towards either refuelling infrastructure or dedicated truck funding in project specific contexts.

The Connecting Europe Facility – Alternative Fuels Infrastructure Facility (CEF AFIF) has provided access to €2.5 billion in subsidies for fuelling infrastructure since 2021<sup>6</sup>, including around €400–450 million awarded to hydrogen refuelling infrastructure projects, providing access to funding for approximately 275 HRS.<sup>7</sup> However, in practice, many CEF AFIF supported stations have faced delays and deployment challenges because sufficient vehicle demand has not yet been secured. Where stations are planned without anchor offtake from heavy-duty vehicles, the business case for construction and operation remains challenging.

Dedicated funding for hydrogen-powered truck deployment has not been made available at the European level at a level commensurate to funding available for infrastructure under CEF AFIF. Funding for hydrogen trucks at the European level to date has primarily targeted first of a kind trial deployments, such as the H2Accelerate TRUCKS project which is receiving €30 million in funding from the Clean Hydrogen Partnership to deploy 125 FCEV trucks from four different OEMs.<sup>8</sup> Dedicated truck funding is needed to scale towards series production.

Europe is supporting refuelling infrastructure, but not always the vehicles needed to use it. Member States may support vehicle deployment, but coverage is uneven and budgets are limited. As a result, the pace of hydrogen truck deployment remains slower than required to support Europe's decarbonisation trajectory.

## Combined funding can improve the effectiveness of public capital

As well as supporting the coordinated roll-out of trucks and stations, combined funding schemes can improve the effectiveness of public capital by linking infrastructure support directly to vehicle deployment.

An indicative comparison of public funding intensity illustrates this potential. Considering only new-build station projects in the 2024 and 2025 SWIM programmes, the average public funding awarded for a package comprising a hydrogen refuelling station and associated vehicle deployment is approximately €4.21 million **per 1 tpd HRS and 30 hydrogen-powered vehicles**, predominantly N2 and N3 vehicles.<sup>9</sup> By comparison, a similar deployment package funded through separate European instruments, using CEF AFIF station funding and H2Accelerate TRUCKS vehicle funding as reference points, would imply a public

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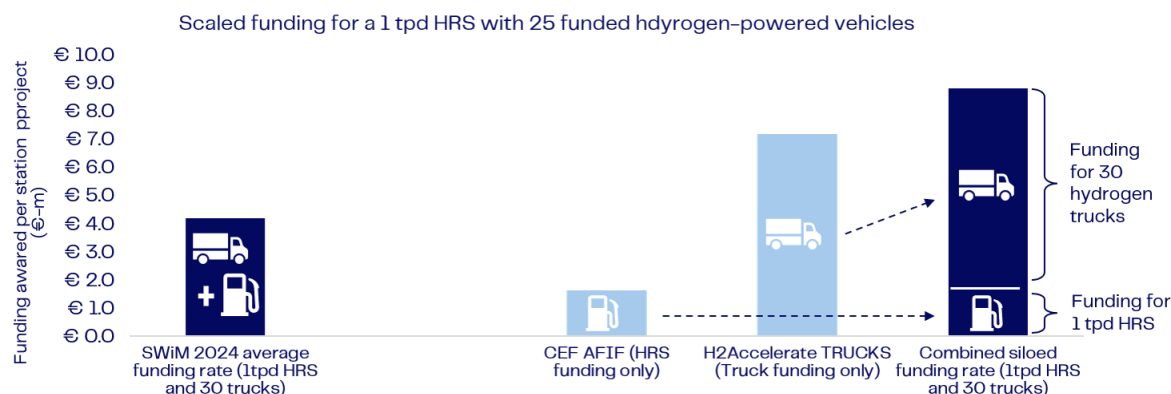
<sup>6</sup> [European Commission, November 2025](#)

<sup>7</sup> [CINEA, April 2024 – 202 HRS funded under CEF AFIF 1; CINEA, February 2025 – 35 HRS funded under CEF AFIF 2 first cut-off; CINEA, November 2025 – 38 HRS funded under CEF AFIF 2 second cut-off](#)

<sup>8</sup> [H2Accelerate TRUCKS, January 2026](#)

<sup>9</sup> Public presentation by RVO, shared July 2026

funding requirement of approximately €8.84 million for one HRS and 30 N3 FCEVs (See Annex 1).



These figures should be treated as indicative and not directly comparable. H2Accelerate TRUCKS supports N3 FCEVs only, while SWiM includes both FCEVs and H2-ICEVs across multiple vehicle classes. CEF AFIF has also supported stations with different capacity profiles. However, the comparison illustrates the potential for combined funding schemes to deliver cost-effective coordinated vehicle and infrastructure deployments.

Assuming a 50% utilisation factor, a 1tpd HRS will save around 27,900 tCO<sub>2</sub> over its 15 year lifetime.<sup>10</sup> With combined funding of €4.21 million this gives a funding efficiency of around €151/tCO<sub>2</sub>, compared to around €317/tCO<sub>2</sub> with siloed funding.

Combined funding schemes offer additional advantages over siloed schemes:

- **Accelerating deployments of stations and vehicles.** As demonstrated through SWiM, combined funding can be effective at driving rapid deployment. Combined funding can reduce utilisation risk for hydrogen refuelling station operators by providing greater visibility of anchor demand, thereby improving the investment case and supporting final investment decisions on infrastructure. This in turn enables end-users to order vehicles with confidence that refuelling infrastructure will be available. The first hydrogen-powered trucks from the SWiM programme are already entering into operations, with more trucks expected on the road in the coming months.<sup>11</sup>
- **Coordination of the hydrogen value chain.** Binding consortium agreements under funding programmes can bring together truck OEMs, station operators, fuel suppliers, and fleet customers around concrete deployment proposals and improve knowledge sharing between these players, while providing a financial incentive for all parties to deliver on their commitments.
- **Unlocking use of existing funding.** Where stations have already received funding, the combined truck and station funding can also be used to anchor additional offtake for already funded stations.

Members of the H2Accelerate collaboration are calling for future European funding to move beyond siloed infrastructure support and towards coordinated funding of hydrogen trucks and stations.

<sup>10</sup> Assuming 1tpd station, 50% utilisation of the station, 15 year lifetime, RFNBO hydrogen carbon intensity of 9.1 gCO<sub>2</sub>/MJ, fossil fuel carbon intensity of 94 gCO<sub>2</sub>/MJ, hydrogen LHV of 120 MJ/kg

<sup>11</sup> [DHL, February 2026](#); [Air Liquide, June 2026](#)

# European funding such as CEF AFIF must be adapted to better support hydrogen trucking deployment

Members of the H2Accelerate collaboration see an opportunity to improve the deployment of public funding by transitioning the next round of CEF AFIF towards a joint vehicle and infrastructure funding model. In this way, the European Commission can more effectively deploy funding for road mobility decarbonisation and better coordinate the deployment of a hydrogen trucking ecosystem in Europe.

Using lessons learned from Member State implementations of combined truck and station funding, the H2Accelerate collaboration proposes the following principles for a combined truck and station funding scheme under CEF, or an equivalent scheme:

- **Dedicated funding for battery electric and hydrogen-powered solutions.** Both hydrogen-powered and battery electric solutions are needed to achieve the 2030 targets under the HDV CO<sub>2</sub> standards. While both solutions are needed, a one-size fits all funding scheme will benefit one solution preferentially. Dedicated funding calls can be adapted to the specific needs of a given technology.
- **Provide at least 6-months' notice of funding application timelines and structure to enable major OEMs and HRS developers to bring together effective project consortia.** The Netherlands' SWiM scheme has seen great success by communicating an intention to run additional annual rounds of the scheme across subsequent years. As such, OEMs and infrastructure developers have sufficient time to develop strong and cost-competitive proposals and engage end users on future opportunities to participate in funding applications.
- **Require funded stations and funded vehicles to apply as part of a coordinated consortia, formed of at least station operators and vehicle end-users.** A key success of the Dutch and German schemes has been the capacity of funding to coordinate and incentivise the entire hydrogen value chain. Where appropriate consortia could also consist of hydrogen suppliers, vehicle OEMs and other relevant value chain participants.
- **Provide flexibility in vehicle and station technologies and HDV classes.** Both the Dutch SWiM and German combi-funding schemes provide caps on funding rates based on vehicle class (N2 or N3) and technologies (H2-ICE or FCE) as well as flexibility in the refuelling technology deployed at stations. This flexibility enables more diverse OEM participation to the schemes and improves dedicated offtake rates from stations. A flexible and pragmatic approach from funding bodies during implementation will increase the success rate of funded projects. **Set suitable time-limits for truck and station deployments to ensure that funding translates to zero-emission wheels on the road.** Funding schemes set limits on the construction timelines and vehicle deployment timelines for funded consortia, thereby incentivising projects targeting real deployments.

Targeted capital funding will remain necessary during the initial phase of European hydrogen mobility deployment, both to achieve TCO parity (in addition to the implementation of supportive policies), and to drive deeper collaboration between hydrogen ecosystem participants.<sup>12</sup> The experience of the Netherlands' SWiM programme and Germany's combined funding scheme shows that smaller, targeted budgets can have a significant impact when they support vehicles and infrastructure together.

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<sup>12</sup> [Transport and Environment, May 2025](#)

## Annex 1 – Coordinated and siloed funding rates for an equivalent project of a 1 tpd HRS and 30 hydrogen-powered trucks

In 2024, the SWiM scheme had a budget of €27.8 million. The scheme funded new hydrogen fuel station capacity of 5,400 kg/day across 5 HRS and a total of 202 N2 and N3 trucks<sup>13</sup>.

In 2025, the SWiM scheme had a budget of €44.2 million. The scheme funded new hydrogen fuel station capacity of 13,500 kg/day across 10 HRS and a total of 308 N2 and N3 trucks<sup>14</sup>.

The average number of trucks per tonne of refuelling station capacity is:

$$\frac{\text{number of trucks funded}}{\text{total capacity funded (tonnes)}} = \frac{202}{5.4} \cong 37 \text{ trucks per tpd of capacity in 2024}$$

$$\frac{\text{number of trucks funded}}{\text{total capacity funded (tonnes)}} = \frac{308}{13.5} \cong 23 \text{ trucks per tpd of capacity in 2025}$$

On average, the SWiM scheme funds 30 trucks per tpd of hydrogen refuelling capacity.

The average funding rate (for combined trucks and stations) per tonne of refuelling station capacity is:

$$\text{funding rate} = \frac{\text{total budget (million)}}{\text{total capacity funded (tonnes)}} = \frac{27.8}{5.4} = \text{€5.15 million in 2024}$$

$$\text{funding rate} = \frac{\text{total budget (million)}}{\text{total capacity funded (tonnes)}} = \frac{44.2}{13.5} = \text{€3.27 million in 2025}$$

On average, across the two rounds, the SWiM scheme has a funding rate of €4.21 million per tonne of refuelling station capacity and per 30 trucks funded.

CEF AFIF awarded around €450 million in funding for 275 hydrogen refuelling stations<sup>15</sup>.

$$\text{funding rate} = \frac{\text{total budget (million)}}{\text{total capacity funded (tonnes)}} = \frac{450}{275} = \text{€1.64 million}$$

The H2Accelerate TRUCKS project funded a total of 125 trucks with a funding rate of €30 million<sup>16</sup>. For 30 trucks that is equivalent to a funding rate of:

$$\begin{aligned} \text{funding rate} &= \frac{\text{total budget (million)}}{\text{total number of trucks funded}} \times 30 \text{ trucks} = \frac{30}{125} \times 30 \\ &= \text{€7.2 million} \end{aligned}$$

The total siloed funding rate for a 1tpd station as well as 30 hydrogen-powered trucks is €8.84 million.

These figures should be treated as indicative and not directly comparable.

<sup>13</sup> Public presentation by RVO, shared July 2026

<sup>14</sup> Public presentation by RVO, shared July 2026

<sup>15</sup> [CINEA, April 2024 – 202 HRS funded under CEF AFIF 1; CINEA, February 2025 – 35 HRS funded under CEF AFIF 2 first cut-off; CINEA, November 2025 – 38 HRS funded under CEF AFIF 2 second cut-off](#)

<sup>16</sup> [H2Accelerate TRUCKS, January 2026](#)