



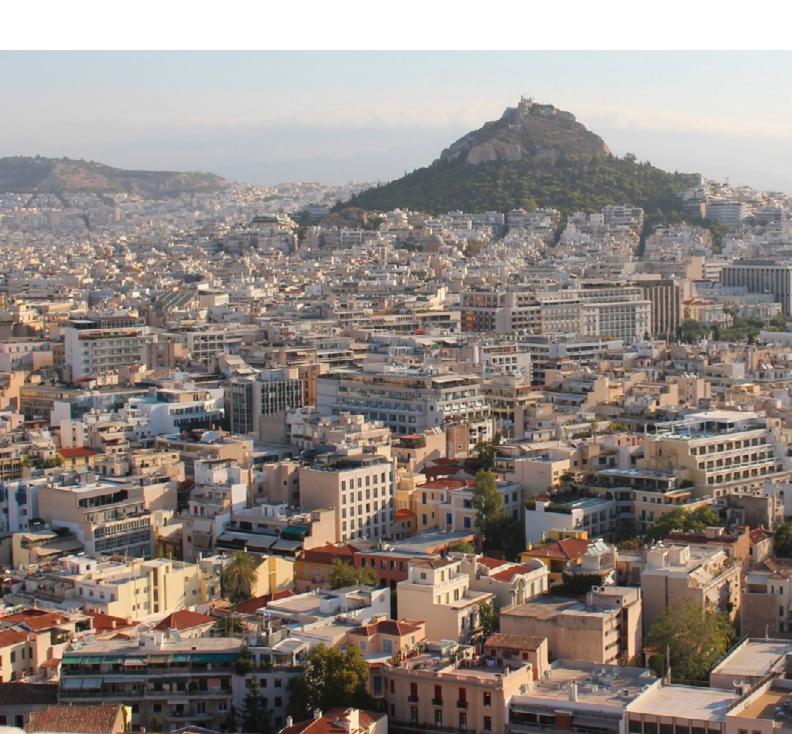






Summary Report

Advancing Sustainable Mobility in Greece Promoting the Uptake of Electric Vehicles



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This is a summary of the electric vehicle workstream. The main authors of this report were Matteo Craglia, Andreas Kopf and Marion Lagadic of the International Transport Forum.

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The transport sector is on the edge of a revolutionary transition. Replacing fossil fuel vehicles with electric vehicles (EVs) will help dramatically reduce greenhouse gas emissions, air pollution and transport costs (ITF, 2021, 2022).

Like the rest of the European Union, the Greek transport sector remains highly dependent on fossil fuels, which accounted for 96% of the sector's final energy consumption in 2021. The use of conventional fuels produced 16.1 Mt of carbon dioxide (CO_2), 85% of which was generated by road vehicles (IEA, 2023).

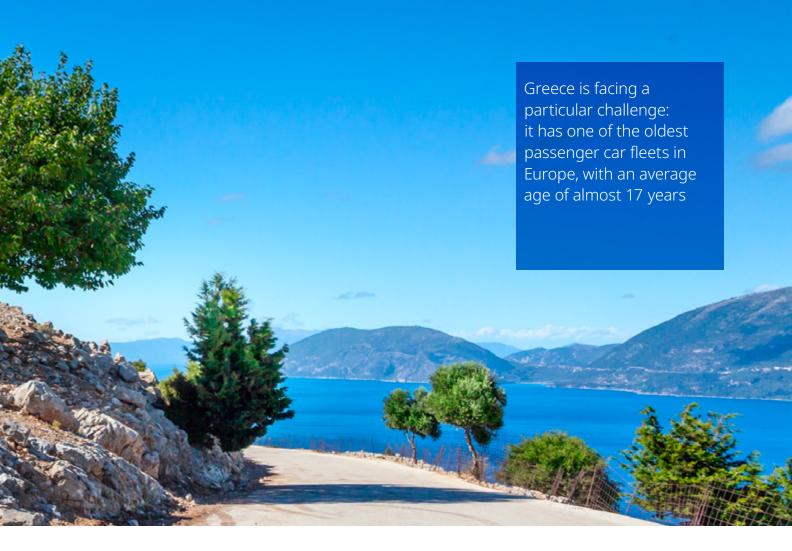
Electrification is the technology set to make the greatest impact in decarbonising road transport since it is expected to cost less than today's conventionally fuelled technologies in the near future (ITF, 2021; 2022).

Greece is facing a particular challenge: it has one of the oldest passenger car fleets in Europe, with an average age of almost 17 years, compared to the EU-wide average of 12 years (ACEA, 2023a). It also has the oldest truck fleet in Europe, with an average age of 23 years,

again compared to an EU average of 14.2 years (ACEA, 2023b). In addition, Greece is increasingly dependent on the import of used vehicles from other European countries (ITF, 2023).

The Greek Government has embarked on an ambitious project to accelerate the transition to electrification. Recent policies include subsidy schemes to support the uptake of EVs within the national fleet and the development of public charging infrastructure; tax incentives to encourage investment in electric vehicles and the manufacturing of vehicles and charging points; high visibility projects on islands; and requirements for municipalities to develop EV charging plans (ITF, 2024b).

These efforts have resulted in fast progress: according to the European Alternative Fuels Observatory, battery electric vehicles accounted for 9.6% of new car registrations in Greece as of March 2024, up from 2.6% in 2020. Yet, this share remains well below the EU average of 17.8% for the same period (EAFO, 2024). The latest Greek National Energy and Climate Plan suggests current policies will lead to a 30% share of electric passenger vehicles in new registrations by 2030 (Hellenic Government, 2023).



However, Greece's current charging infrastructure is insufficient to support this uptake. Developing this infrastructure is one of the country's priorities in its efforts to align with the EU's Alternative Fuel Infrastructure Regulation (AFIR), which sets ambitious national targets for charge point deployment in EU member states along the Trans-European Transport Network (European Parliament, 2023).

This report reviews current Greek policies promoting electromobility and compares them to best practices in the EU. Detailed results are presented in an extended version of the report (ITF, 2024b). The recommendations presented in this summary for policy makers are based on:

- benchmarking Greek subsidy schemes for EVs and charging infrastructure
- comparing Greek policies promoting charging infrastructure in local and regional authorities to identify the most promising models for the procurement of charging infrastructure and future challenges

- assessing the Alternative Fuels and Infrastructure Regulation targets in the Greek context
- quantitatively analysing future EV charging demand under different scenarios to highlight electromobility's potential impacts on the electricity grid and identify ways to avoid bottlenecks in charging infrastructure deployment.

This workstream supports the Hellenic Ministry of Infrastructure and Transport in its efforts to accelerate the uptake of EVs and the development of their charging infrastructure in Greece.

The project is funded by the European Union via the Technical Support Instrument and implemented by the International Transport Forum in co-operation with the Hellenic Ministry of Energy and Environment, the Hellenic Ministry of Infrastructure and Transport and the European Commission's Directorate-General for Structural Reform Support (DG REFORM).

Benchmarking subsidy schemes

In 2020 Greece initiated the "I Move Electric" (IME) vehicle subsidy scheme to support new EV purchases. The scheme has helped accelerate electromobility in the country, which remains in the early market stages.

Current market conditions in Greece mean that subsidies for electromobility will continue to be necessary to help mature the market and accelerate EV adoption in a wider range of vehicle types and market segments. Greek consumers are relatively price-conscious compared to other, wealthier European countries, as shown by the share of used imports of passenger cars (see Figure 1), which increased from 15% of newly registered vehicles in 2015 to 40% by 2022. Most light commercial vehicles (LCVs), trucks and buses entering the Greek vehicle fleet are also used imports. Therefore, vehicle purchase subsidies for new vehicles are important but will only impact a subset of the total vehicle market in Greece.

The IME subsidy scheme was updated in July 2022 to increase the highest subsidy amount for passenger cars from EUR 6 000 to EUR 8 000. It also removed vehicle eligibility thresholds that disqualified subsidies to vehicles costing more than EUR 50 000. This made relatively expensive EVs eligible for IME purchase subsidies. Of all vehicles subsidised in the second phase of the scheme, 23% were luxury cars costing more than EUR 50 000.

The total budgets made available by the Greek Government for EV subsidies (EUR 50 million and EUR 60 million for IME phases I and II, respectively) are modest compared to many larger and wealthier European countries. Therefore, they must be used efficiently to maximise EV adoption and carbon savings.

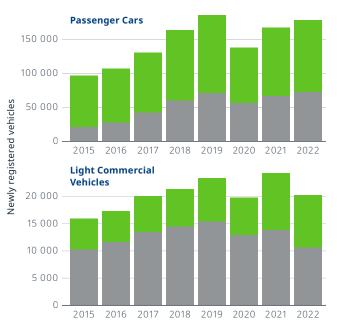
Many new EVs continue to be more expensive than comparable conventional cars, even with subsidies. Early adopters of EVs generally have a higher than average willingness to pay. With the increasing market adoption of EVs, this more affluent share of the population will likely be able to buy EVs without the need for subsidies.

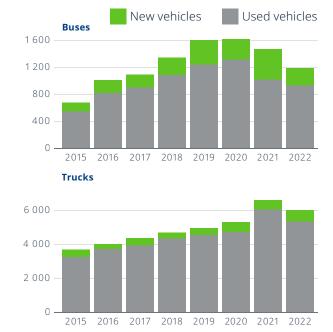
This means subsidy schemes should be tailored where possible to target lower-income households. One simple way to do this would be to reinstate eligibility limits to avoid subsidies for expensive vehicles. Other European countries such as France, Germany, Italy and Spain all limit subsidies in this way. Another way to target the mass market would be to include subsidies for used vehicles. Such measures would help to limit subsidies to the most in-need consumers and, therefore, use subsidy budgets more efficiently to stimulate vehicle adoption.

The Greek Government lacks data about the types of consumers that apply to the IME scheme, their socio-economic backgrounds, types of residence (e.g. apartment vs. single occupancy) or intended vehicle charging behaviours (e.g. workplace charging vs. onstreet residential). Collecting this information via the IME online application portal would be easy to implement, and provide better understanding of consumer barriers. Consumer surveys would also be welcome.

Figure 1:

Newly registered vehicles: New vehicles versus used imports by vehicle type





Source: Data from Hellenic Association of Motor Vehicle Importers (AMVIR, 2023).

Recommendations for improving electric vehicle subsidies

The following recommendations address how to successfully adapt subsidies to encourage the uptake of EVs, particularly for consumers who are the most in need.

Target marginal consumers to ensure the maximum impact of subsidies

Subsidies should target marginal consumers who would otherwise be unable to purchase an EV. Directing subsidies to these consumers can help to maximise the impact of limited government funds. Subsidies should not be used for luxury vehicles, whose drivers may be able to purchase the vehicle without assistance.

The Greek Government should reinstate the limits on the maximum purchase price of vehicles eligible for subsidies in phase 1 of the IME scheme (which were similar to limits in other European countries). It should lower this eligibility threshold and the maximum magnitude of subsidies over time as the market matures to better target marginal consumers and subsidise more vehicles within a given budget.

With increasing market maturity, subsidies for private charging infrastructure should be prioritised for challenging segments (e.g. apartment buildings) to enable widespread adoption.

Collect data on applicants to identify marginal consumers

The Greek Government should collect more disaggregated anonymous data from subsidy schemes to highlight categories and users of charging that may require tailored support. Understanding the characteristics of households and businesses receiving subsidy support is important to maximise the utility of government funds by targeting marginal applicants. Collecting data on the socio-economic characteristics of applicants and user types will help.

Target subsidies for used vehicles and lower-income groups to unlock mass-market EV adoption

Subsidies for used EVs could help accelerate vehicle fleet electrification and support lower-income households. Used-vehicle subsidies have already been introduced in France, Germany, Lithuania and the Netherlands. Such subsidies could improve the residual value of new EVs, reducing barriers to new vehicle purchases. The Greek Government may also wish to consider social leasing programmes, which have been adopted in France, to help support electromobility in lower-income households.

Consider revising the administrative operation of subsidy schemes towards indirect disbursement models

The disbursement of subsidies should be as socially inclusive as possible. The current Greek model of disbursing subsidies directly to consumers has the disadvantage that the consumer pays the full price of the EV (and charger) upfront before receiving the subsidy at an uncertain later date. Greek subsidy schemes also allow car dealers to receive subsidies on behalf of consumers, but this has not been widely adopted, likely due to dealers' hesitancy in shouldering the financial burden.

A third model, which has been successful in Italy, allows the vehicle importer/manufacturer to bear the financial burden on behalf of the consumer and dealer and receive a government tax credit. Greek policy makers should consider applying this model as a way to reduce barriers for consumers seeking to access subsidies. This would be particularly relevant for taxi subsidies, which are large for price-sensitive consumers.

Plan to introduce subsidies for electric medium- and heavy-duty vehicles

Greece currently has no subsidy schemes for mediumand heavy-duty vehicles (HDVs) of class N2 (weighing 3.5–12 metric tonnes) or N3 (weighing over 12 metric tonnes). EVs in these segments are at early stages of market maturity but are increasingly cost-competitive, and other European countries are introducing subsidy schemes to stimulate their adoption.

Greece relies heavily on used-vehicle imports of trucks rather than new sales, meaning any new adoption of electric trucks is likely to be limited in the short term. However, proactive companies should be supported where possible with subsidies during early market deployment.

Deploying charging infrastructure in local and regional authorities

Public charging infrastructure is essential to accelerate EV deployment.

The deployment of charging infrastructure in Greece is currently at an earlier stage than in leading European countries. To accelerate deployment, in 2023 the Greek Government announced the Charge Everywhere subsidy programme and an initial EUR 80 million in financial support to develop public charging infrastructure.

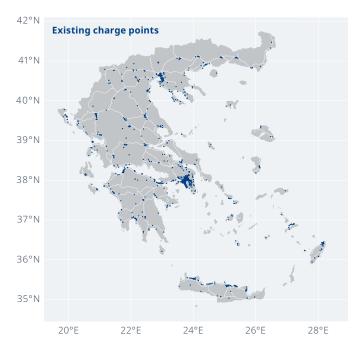
By January 2024, 4782 public and semi-public chargers (excluding those below 7.4 kW) were registered in the Ministry of Infrastructure and Transport's digital registry (MoIT, 2024). Most publicly accessible charge points are located in retail environments (e.g. supermarkets and malls), with a smaller number at service and refuelling stations. There are very few charging points on public land managed by local or regional authorities.

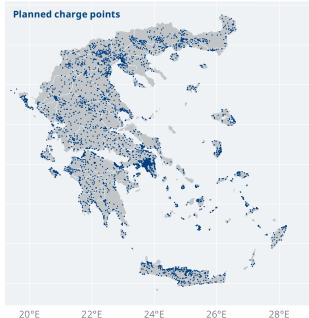
To initiate the adoption of chargers on public land, the Greek Government required municipalities to develop EV municipal charging plans outlining the locations of future EV charging infrastructure. Building charge points in these strategic places (see Figure 2) would help accelerate EV adoption across Greece.

Having completed their EV municipality charging plans, many Greek municipalities are now deciding how best to work with Charge Point Operators (CPOs) to build and operate the planned charging infrastructure. A range of models exists, including permitting (where a local authority and a CPO directly form a contract to build a limited number of charge points), concession agreements (where CPOs competitively bid for the exclusive right to supply charging services in a location), and models that involve a local authority paying for charging infrastructure construction and allowing a CPO to operate it. From a review of past European experiences, concession models have been the most successful at scaling up a competitive market and ensuring widespread regional coverage of charge points.

To help support local authorities, in 2023 the Greek Government published guidelines for developing concession agreements, which local authorities can use as a template (MEE, 2023). However, successfully procuring charging stations on public lands will depend on the skills and resources in municipalities, many of which lack staff with electromobility experience. Over one-quarter of municipalities in Greece do not have a fully operational technical service department and instead rely on administrative support from other bodies (EETAA, 2022). Providing guidance and financial support and promoting inter-municipal collaboration on tender procurement will be crucial to accelerating charge point adoption. Joining together with neighbouring municipalities on charging infrastructure concession tenders can also provide economies of scale to improve the financial proposition to CPOs and consumers.

Figure 2: Existing and planned publicly accessible charge points





Notes: Existing charge points adapted based on MoIT Greek charge point registry obtained February 2023. Planned charge points as submitted from EV municipal charging plans, obtained February 2023.

Recommendations for increasing charging infrastructure

After assessing different European experiences in deploying publicly accessible charging infrastructure, the ITF makes the following recommendations.

Prioritise concession tender models for charging infrastructure deployment

Local authorities are responsible for maximising the benefits of charging infrastructure for their constituents. Concession tender models can ensure bidders compete to offer the lowest costs and best service for charging infrastructure. They can give local authorities greater control over charging services on the lands they manage and provide long-term certainty to CPOs to ensure a viable business case and rapid charger deployment.

Disaggregate concession areas and bundle profitable locations with less economically viable locations to ensure widespread coverage

The dominance of a single CPO in a territory could risk high prices from limited market competitiveness. The bundles of charging locations included in concession agreements should ideally overlap spatially and be awarded to different concessionaires to favour competition.

Similarly, charge points in less frequented locations may be underdeveloped if concession agreements only include highly profitable locations, which could hinder widespread territorial deployment. Therefore, locations of varying economic viability should be grouped into bundles to ensure that charging infrastructure is deployed widely. Local authorities should be made aware of these suggestions since they are not explicitly laid out in existing concession agreement guidelines provided by the Greek ministries.

Provide support for local and regional authorities to work on charging infrastructure, including both financial resources for staff and guidance to help support decision making

Much of the success of planned concession agreements will rest on the capacities of local and regional authorities. Topics related to e-mobility are new to local authorities, who require sufficient funds for dedicated staff working on e-mobility. They must also be given sufficient guidance and training from the national government to make informed decisions. Providing these resources is likely to be relatively inexpensive compared with the total size of policy packages supporting e-mobility, and it is an investment to ensure the long-term success of e-mobility in Greece.

The Greek Government should also promote cooperation agreements between municipalities to help local authorities with constrained technical departments share staff and knowledge. Municipalities in major urban centres are well-placed to collaborate via municipal enterprises; other municipalities may benefit from promoting programmatic contracts or existing collaboration frameworks for technical services.

Develop regional charging plans

Existing work on promoting charging infrastructure in Greece has focused on municipalities that have developed their own charging plans and are now proceeding to concession agreements. A similar approach should be followed for regional authorities, which have responsibilities over additional strategic locations for charging infrastructure.

Many roads on the TEN-T network are managed by regional authorities, meaning that developing regional charging plans is important to achieving EU Alternative Fuels Infrastructure Regulation (AFIR) targets. Greek regions are legally required to develop sustainable urban mobility plans (SUMPs), a process that none have yet started (ITF, 2024a). The development of the charging infrastructure could also be included within the regional SUMPs.

Meeting the Alternative Fuels and Infrastructure Regulation targets

The Alternative Fuel Infrastructure Regulation (AFIR) is an EU-wide regulation introduced in 2021 with mandatory national targets for the deployment of EV charging infrastructure on the TEN-T core and comprehensive network.

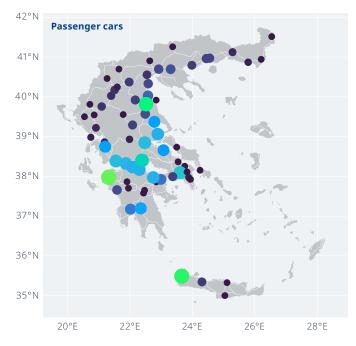
As part of the current project, the ITF estimated the minimum number of EV charging stations needed in Greece to meet AFIR targets and compared them with future EV charging demand (see Figure 3) and potential impacts on the electricity grid (for full details see ITF, 2024b). This included analysing current travel patterns, modelling future uptake of electric passenger cars and HDVs in the Greek fleet, estimating where vehicles will need to stop to recharge and how future charging demand compares with the capacity of current electricity grid substations, using data provided by the Hellenic Electricity Distribution Network Operator (HEDNO).

The speed of EV adoption in Greece will be constrained by its reliance on used imports and the long average lifetime of vehicles. In the baseline scenario (aligned with the current trajectory scenario of the latest Greek National Energy and Climate Plan (Hellenic Government, 2023), EVs account for 8% of the passenger car fleet in 2030, 39% in 2040 and 61% by 2050. For trucks, EVs account for 18% of the fleet by 2040 and 44% by 2050. Further accelerating EV adoption requires faster adoption of EVs in new sales, reduced dependence on used imports and shorter vehicle lifetimes.

The Greek Government is currently not on track to meet the AFIR targets at the end of 2025. This is particularly the case for HDVs since, as of April 2024, there were no electric HDVs in Greece and limited specialised charging infrastructure to support them on the TEN-T network. However, even for passenger cars, only 14% of the charging pools needed to comply with AFIR 2025 targets were in place in April 2024.

AFIR targets are the same for all EU member states and are designed to be ambitious. However, this analysis suggests that much of the charging infrastructure needed to meet the AFIR targets and the associated grid upgrades concerns locations that will likely not see significant EV charging demand in the near future, given the Greek context and constrained speed of EV adoption.

Figure 3: **Peak power demand from electric vehicle charging in 2035: Baseline scenario**



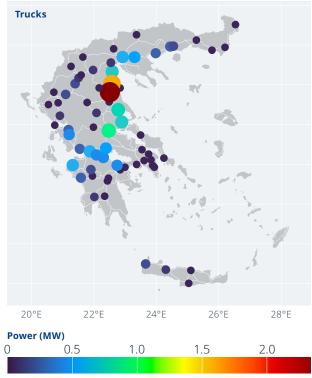
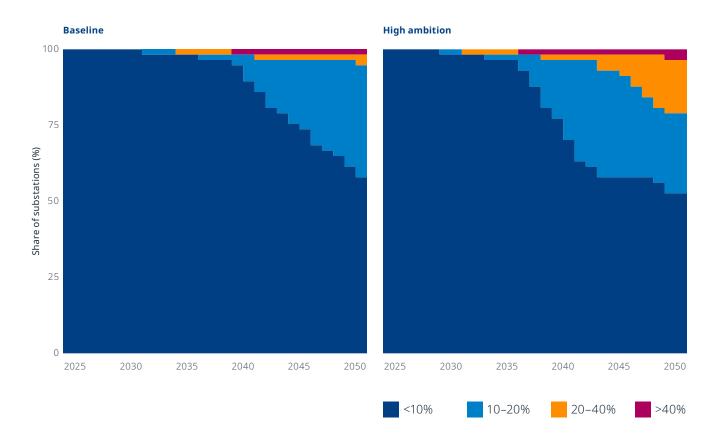


Figure 4:
Share of electric vehicle charging demand in peak substation demand: Baseline and High Ambition scenarios



In light of these challenges, priority should be given to installing charging pools and grid strengthening at locations of high future charging demand (see Figure 3). Focusing on limited strategic locations can help keep the required investment levels manageable. Such an approach would help phase in charging infrastructure and grid upgrades, focusing efforts first on the most important locations needed to accelerate the EV transition. It would also help to manage the levels of government subsidies that would need to be provided to CPOs installing underutilised charging infrastructure.

The timeline to achieve the AFIR requirements is short, and there is a risk that Greece may not be able to meet all AFIR targets in 2025 and 2030. However, the prioritisation strategy outlined above should allow the government to pro-actively address EV demand growth and make EVs a convenient choice for Greek households, which is critical to the transition to electromobility.

Charging infrastructure deployment will lead to additional demands on the electricity grid. Figure 4 shows the share of the peak electricity demand from EVs at each electricity grid substation. Up to 2030, the demand for EV charging power is relatively small (less than 10%) compared with other sources of electricity

demand at the substations considered. However, EVs will become an increasingly important source of demand from the 2030s onwards, representing over 20% of power demand in many stations. It will be essential to prepare the grid for these increasing loads. Since the grid upgrades might require significant timescales (up to 11 years), system operators should proactively plan grid reinforcements based on the forecasted EV deployment scenarios and traffic flow analysis.

Current timelines and grid update procedures may need to be adapted, given the scale of the challenges and the diversity of stakeholders. Specialist labour shortages and material scarcity for grid upgrades are already challenging but are expected to worsen in the coming years (HEDNO, 2024). Initiating updates now is crucial to mitigate these challenges and ensure efficient grid modernisation. Establishing an intersectoral co-ordination board with transparent timelines for stakeholders can enhance co-ordination and visibility across the value chain. Additionally, emergency legislation may offer avenues to streamline permitting procedures and minimise legal disputes, further facilitating the timely implementation of necessary grid upgrades.

Recommendations for meeting the AFIR targets

The following recommendations address how to meet future charging demand in line with AFIR targets.

Proactively prepare the electricity grid for electric vehicle charging demand

Conventional demand-led network planning processes may no longer be sufficient to enable rapid EV adoption. While the electricity grid can most likely serve short-term charging needs, several substations may require strengthening in the 2030s. Proactive grid expansion can help to avoid bottlenecks, such as material and labour shortages, and speed up EV adoption.

Align network reinforcement strategies with AFIR requirements and real-world demand projections

Meeting AFIR charger deployment targets can help achieve high-ambition levels of electrification but will require significant grid strengthening. Given current EV adoption rates in Greece, AFIR targets may be higher than the demand for charging in the short term. Network reinforcement strategies should prioritise meeting AFIR targets in strategic locations with high EV-charging demand to avoid underused charging infrastructure. Where possible, charging infrastructure should be future-proofed to avoid additional grid strengthening by over-specifying equipment in anticipation of increasing long-term future demand, potentially above AFIR targets.

Define priority charging locations and tailor charging infrastructure deployment policies

The Greek Government should identify priority charging locations on the TEN-T network in consultation with industry stakeholders to accelerate charger deployment. Defining these locations enables HEDNO and the Independent Power Transmission Operator (IPTO) to pre-emptively include required grid updates in their long-

term network development plans. It provides market signals to wider stakeholders that mass EV charging will be available in the foreseeable future. Consider tailoring financial incentives for charging infrastructure towards these priority locations to maximise the impact of government funds.

Accelerate permitting and approval processes for charging infrastructure deployment

Permitting and court-appealing processes contribute significantly to the uncertainty in the timelines of grid upgrades. The European Commission has issued emergency regulations to accelerate renewable energy permitting. Some countries, such as Germany and the Netherlands, have extended the implementation of the legislation to charging infrastructure. This includes parallelising grid network planning between different authorities (e.g. transmission and distribution system operators) or reducing the number of consultations for centrally defined, strategic charging locations. Greece could adopt similar measures and exempt grid reinforcement processes, such as substation upgrades, from environmental impact assessments. Additional examples include raising the barriers to appeal against granted environmental permits or unsuccessful tender bids from other European countries, such as Germany.

Develop strategic platforms to improve co-ordination between electromobility stakeholders

Strategic co-ordination is required between policy makers, HEDNO, IPTO, the Regulatory Authority for Energy (RAE), CPOs, road concessionaires, motorway service station operators and logistics companies (for HDVs in particular) to install charging infrastructure where it is most needed and avoid grid constraints where possible. Aligning supply and demand, regularly and transparently exchanging information on grid-strengthening timelines and having long-term objectives increases the planning reliability of all stakeholders.



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Advancing Sustainable Mobility in Greece

Promoting the Uptake of Electric Vehicles

This project supports Greece in developing a sustainable transport sector and cleaner mobility. Specifically, it aims to accelerate the uptake of electric vehicles and the adoption of Sustainable Urban Mobility Plans (SUMPs) by regional and municipal authorities. This report presents results and recommendations related to the promotion of electromobility.

By 2030, at least 30 million zero-emission cars will be operating on European roads. This project aims to help Greece attain this objective, as set out in the European Commission's Sustainable and Smart Mobility Strategy. Greece's car fleet is among the oldest in Europe, with an average vehicle age of 16 years. The uptake of electric vehicles (EVs) in Greece remains very low: in 2020, EVs accounted for only 2.6% of new car sales, compared with the European Union (EU) average of 10.5%. The project reviews best practices in the EU, using ITF quantitative modelling to develop policy recommendations for accelerating EV adoption in Greece, including the expansion of charging infrastructure. The official project title is "Recharge and Refuel: Clean, Smart and Fair Urban Mobility".

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