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EBI position paper on the Alternative Fuels Infrastructure Regulation (AFIR) Revision

European Boating Industry (EBI), representing the recreational boating and nautical tourism sector in Europe, welcomes the review of the Alternative Fuels Infrastructure Regulation (AFIR) and supports the EU's objective to accelerate the deployment of alternative fuels infrastructure across transport modes and leisure/tourism. As identified in the Sustainable Transport Investment Plan (STIP), recreational craft experience a low renewable rate of penetration of new vessels and will still use liquid fuels in the years to come and drop-in alternatives are needed. This will require a substantial infrastructure shift. The industry is committed to this pathway, investing in Life Cycle Assessment, accelerating innovation and infrastructure as emphasised in the 2026 EBI Roadmap for alternative fuel infrastructure[1].

I. Background

The recreational boating sector covers a wide range of vessels and use cases, including small motorboats, sailing boats, inland waterway craft, personal watercraft, and larger yachts. These vessels are used across coastal and inland waters for private and commercial purposes such as leisure, tourism, and charter activities. The sector is characterised by a highly diverse fleet with varying sizes, energy needs, and usage patterns, which directly impacts infrastructure requirements, needing a technology-neutral approach to both propulsion and infrastructure development.

The recreational boating sector is a predominantly SME-based ecosystem covering manufacturing, marine equipment, refit and maintenance, as well as marinas and commercial charter/rental of recreational boats. As highlighted in the EU's Industrial Maritime Strategy, it is a key constituent of the maritime manufacturing ecosystem, with the sector being one where competitiveness, decarbonisation and innovation can progress. The Strategy also highlighted the ongoing evaluation of the Recreational Craft Directive 2013/53/EU that focuses on assessing the rules on novel watercraft and novel propulsion systems in this segment. The sector is undergoing a transition driven by decarbonisation objectives, which is closely linked to the availability of alternative fuels infrastructure. While propulsion technologies are advancing rapidly, including electric, hybrid, sustainable drop-in fuels and other emerging solutions, the deployment of supporting infrastructure in marinas (non-commercial pleasure ports) and marine fuel stations outside of marinas is not keeping pace. Ensuring that infrastructure development aligns with technological progress and market demand is therefore essential.

As outlined in EBI's roadmap, the transition will require a technology-neutral approach, with different propulsion and fuel solutions being appropriate for different vessel types, operating profiles and geographical context. Infrastructure planning should therefore reflect these different needs and evolve alongside market developments and manufacturers' future propulsion choices.

II. Industry readiness

Demand for alternative fuels infrastructure in recreational boating is emerging from several concrete segments of the market. First, marinas and nautical tourism destinations are increasingly expected to provide low-emission infrastructure as part of broader local decarbonisation, tourism and environmental strategies. Second, charter, rental and commercial recreational boating operators have a stronger business case due to higher utilisation rates and visibility to consumers. Third, inland waterways, lakes, protected coastal areas and urban boating areas are already creating demand for cleaner propulsion

[1] https://www.europeanboatingindustry.eu/newsroom/latest-news/item/1262-european-boating-industry-launches-roadmap-for-alternative-fuel-infrastructure-in-marinas

solutions, including through local access restrictions, low-emission zones or environmental requirements. Fourth, parts of the existing fleet can already use sustainable drop-in fuels such as HVO, creating immediate potential demand for compatible refuelling infrastructure without requiring vessel replacement. Finally, new electric, hybrid and alternative-fuel recreational craft entering the market will require reliable charging and refuelling options to give consumers and operators the confidence to invest.

The sector comprises over 6.5 million vessels and over 10,000 marinas across Europe, many of which are SMEs or municipally operated. Marinas are the critical interface between vessels and energy supply and are essential for enabling the uptake of alternative propulsion technologies. While the sector represents a relatively small share of EU transport emissions (approx. 0.4%),[2] it is actively contributing to decarbonisation and requires appropriate policy recognition to unlock its potential. Sustainable drop-in fuels such as HVO can reduce lifecycle greenhouse gas emissions by up to 90% and represent one of the most immediately deployable decarbonisation solutions for the existing fleet.

A key challenge is the diversity of the fleet and its low renewal rate, meaning that most vessels operating in 2040 or further in time will already be in use today. This requires a technology-neutral approach, a combination of solutions, in particular sustainable drop-in fuels (such as HVO), which represent an immediately scalable option for the existing fleet, alongside electrification, hybridisation and emerging fuels like hydrogen and methanol, supported by adequate infrastructure. Recreational boating is a hugely diverse sector, and recreational boats have an average lifespan of over 40-50 years and engines are used on average between 35 and 48 hours per year. These particularities need to be taken into account when designing the regulatory framework.

At present, marina infrastructure is largely designed for conventional fuels, with only limited deployment of electric charging or alternative fuels. At the same time, infrastructure development is constrained by high investment costs, limited space, grid capacity challenges, and regulatory fragmentation across Member States. Onshore power supply is however not an issue and already standard in marinas. Existing electrical infrastructure in many marinas is already capable of supporting slow and overnight charging for recreational boats, reflecting their typical usage patterns, and infrastructure requirements should therefore be proportionate to actual operational needs. For this reason infrastructure planning should be based on the expected use of alternative propulsion technologies in the foreseeable future, taking into account technological developments, market trends and the recommendations set out in EBI's Roadmap on alternative fuel infrastructure[3]. This will help ensure that investments are proportionate, future-proof and aligned with the sector's transition.

Moreover, many marina operators do not own the land or water space on which they operate but function under concession agreements with public authorities. This can significantly limit their ability to invest in or modify infrastructure and should be taken into account when designing any future regulatory requirements. Similarly, marine fuel stations often operate with limited financial capacity and, particularly in environmentally sensitive areas, may face complex permitting procedures for new or additional fuel storage infrastructure. Many existing recreational boat engines are already approved by manufacturers for the use of HVO, allowing emissions reductions without requiring modifications to the

[2] https://single-market-economy.ec.europa.eu/document/download/cb8bfec9-ea25-4d9c-ab7b-72dbf2f95fab_en?filename=Final%20Report%20Review%20Study%20on%20the%20Recreational%20Craft%20Directive%202013%2053%20EU.pdf

[3] https://www.europeanboatingindustry.eu/newsroom/latest-news/item/1262-european-boating-industry-launches-roadmap-for-alternative-fuel-infrastructure-in-marinas

propulsion system.

Addressing recreational boating in the AFIR review would also support several EU policy objectives beyond emissions reduction. The sector is closely linked to Europe's maritime industrial base, nautical tourism, coastal and inland regions, SME competitiveness and innovation in clean propulsion technologies. The availability of appropriate infrastructure is becoming a determining factor for whether manufacturers, marinas, charter operators and consumers can invest in alternative propulsion solutions. Without a coherent EU framework, infrastructure deployment risks remaining fragmented across Member States, creating uncertainty for industry and users. Including recreational boating and marinas in AFIR would therefore help ensure consistency between the EU's transport, tourism, industrial and maritime policy objectives, while supporting a sector that is already engaged in the transition but requires infrastructure certainty to move further.

III. Policy pathways

Recreational boating and marina infrastructure are currently not addressed in AFIR. EBI proposes a clear three-level policy approach:

1. Full AFIR inclusion

Recreational boating and marina infrastructure should be included directly within the scope of AFIR through a dedicated, technology-neutral and proportionate framework. A specific article should cover non-commercial coastal and inland ports serving recreational craft and support infrastructure planning, harmonised standards, access to funding and implementation aligned with technological maturity and market demand.

2. Partial AFIR inclusion

If full inclusion is not feasible, AFIR should require Member States to assess the alternative-fuel and electric-charging needs of recreational craft in their national policy frameworks and progress reports. This would establish a strategic basis for proportionate measures, investment planning and create synergies with other AFIR-regulated sectors for on-road, off-road, inland-navigation, tourism and local-energy applications.

3. Non-AFIR policy approach

If recreational boating is not included in AFIR, a dedicated EU working group or coordination mechanism on alternative fuels infrastructure for recreational boating and marinas should be established. It should bring together Member States, industry, marina operators, fuel and energy providers, port authorities and nautical tourism actors. Its mandate should be to map demand and infrastructure gaps, identify investment needs, develop technical and safety guidance, address permitting and funding barriers, and explore shared infrastructure, joint investment models and common standards with neighbouring sectors in a strategic framework.

Such a mechanism would help avoid fragmented infrastructure deployment, ensure that recreational boating is considered alongside related sectors, and identify where shared infrastructure, joint investment models or common technical standards could support the transition in a cost-effective and proportionate way.

Additional recommendations for the AFIR revision:

- Recognise marinas as key energy hubs for the maritime transition.
- Inclusion in the EU Alternative Fuels Observatory (https://alternative-fuels-observatory.ec.europa.eu/).
- Provide EU funding and pilot projects for marina infrastructure, to finance infrastructure deployment, promotion of harmonised technical standards and clearer permitting frameworks.

It should be noted that most non-commercial ports are not run by large corporate businesses but by SMEs, medium-sized players, non-profits, local municipalities or public entities.

Including recreational boating in AFIR or other related policy approach would be a targeted and efficient way to support the transition of a sector that is ready to contribute to EU climate objectives, while ensuring that no part of the maritime ecosystem is left behind. Industry is investing in alternative fuel readiness, new propulsion systems, EU regulation for new craft is being evaluated with a focus on new propulsion, the missing link of infrastructure readiness needs to be closed through AFIR in a consistent and comprehensive manner.

About EBI

European Boating Industry (EBI) represents the recreational boating and nautical tourism sector in Europe, with 24 national associations and 14 sustaining members. Speaking for the entire value chain, EBI works with European institutions and stakeholders to **advance a sustainable boating and nautical tourism industry Made in Europe**. EBI helps shape the future of recreational boating and nautical tourism in Europe through advocacy, sustainability initiatives, regulatory guidance, event platforms, studies and industry collaboration.

The sector includes approximately 32,000 companies, over 18,000 marinas, supports 280,000 direct jobs, and enables 48 million people to enjoy boating and water sports each year.

Besides its active role at EU level, EBI also holds official stakeholder status with HELCOM (Baltic Sea), OSPAR (North-East Atlantic), Mediterranean Action Plan, the United Nations Economic Commission for Europe (UNECE) and the European Committee for drawing up standards in the field of inland navigation (CESNI). It is an affiliate member of UN Tourism, and member of the Tourism Manifesto Coalition, the European Circular Composites Alliance and Waterborne Technology Platform.

The sector encompasses the following subsectors:

- Manufacturers (motorboats, sailing boats, large yachts, personal watercraft)
- Manufacturers of engines, equipment and components
- Refit and maintenance yards
- Dealers and importers
- Marinas and yacht harbours
- Charter and rental companies and boating schools
- Service companies

For more information, please consult the EBI website (europeanboatingindustry.eu), contact EBI (office@europeanboatingindustry.eu) or follow us on LinkedIn.