

Template for comments and secretariat observations

Date: 2026-05-08

prEN 18324

SISPK642-00001

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
DS		6.4.1	a	ge	Requiring two independent methods for public AC charging is cost-increasing and risks slowing down the deployment of public AC charging infrastructure due to higher costs.	Consider excluding AC charging from this requirement, both for private and public charging infrastructure.	
		6.4.1	b	ge	The meaning of the text is unclear regarding grasping. Need clarification.		
		7.1.2	b	ge	The use of the International Symbol of Access (ISA) risks creating problems, as the symbol is widely known and perceived as indicating a space reserved exclusively for persons with disabilities.	Use the term "priority parking" together with a separate symbol specifically intended for this purpose.	
		7.1.2	c	ge	Such an exemption risks creating uncertainty regarding the rules applicable to "ordinary" parking spaces reserved for persons with disabilities.		
		7.1.3	a	ge	Applying this requirement to all charging spaces is cost-increasing and risks reducing the number of charging points deployed due to space constraints.	This requirement should apply only to charging spaces that are specifically designed for persons with disabilities, and not to all parking spaces.	
		7.1.4	c	ge	It can be difficult to comply with this requirement when installing charging stations on existing sites. At fuel stations, there may be situations where steeper gradients are necessary, and in some cases these areas are the only available locations for charging infrastructure.	We therefore suggest replacing "shall" with "should". Alternatively, exemptions or flexibility should be allowed where other regulatory requirements apply (e.g. gradients required for spill containment or specific drainage solutions due to water protection areas).	
		7.2.3	b	te	In most cases, a CPO has no control over the availability of public toilets or how they are designed.	Remove from standard.	
		7.2.3	c	te	See comment above. Public toilets are not directly a part of accessible charging spaces.	Change from shall should	
		8.1.2.	a-b	te	Static and dynamic data is a part of AFIR. Does not have to be in this document	Remove	

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 2026-05-08	prEN 18324	SISPK642-00001
------------------	------------	----------------

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
		8.2.2	a	te	Operators do not have 100% over where signs can be displayed.	Change from shall should	
		8.2.5	a	te	Needed signage could be one sign for a larger connected area.	Change from "each parking spot" to "the charging pool".	

Svar från:

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial