

Action Plan 2025-2027

CO2 Performance Ladder recertification 2025

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Reader's guide

This action plan translates our climate strategy into concrete measures for 2025–2027. It defines short-term CO2 and energy targets, specifies actions with timelines and responsibilities, and shows how these steps build toward our 2030 objectives.

The plan focuses on construction and equipment procurement—our two largest emission sources or "activities"—while also addressing business travel and operational emissions. All measures follow the Trias Energetica: reduce energy demand first, use renewable energy second, and deploy cleaner alternatives where full decarbonization is not yet feasible.

This document fulfills requirement 2.B.2 of the CO2 Performance Ladder and should be read alongside our Climate Transition Plan (2.B.1).

4.1 Short-term CO2 target (2027)

Overall target

2% total intensity reduction in CO2 emissions per kWh sold by 2027 compared to 2024 baseline (excluding employee commuting).

We acknowledge that our 2027 intensity target and sub-targets are rather low-this is in line with our expectations. The increased sale of electricity (and increased CO2 emissions reduction results) will come later. We refer to this as the "chicken and egg problem," which Fastned has been trying to address since its establishment.

Sub-objectives by activity

- Construction: 1% intensity reduction per kWh sold
- Equipment procurement: 7% intensity reduction per kWh sold
- Business travel: 15% intensity reduction per kWh sold
- Operations (scopes 1&2): (none-please see explanation above for more information)

Please note that while the Business Travel and Operations activity categories are not considered Fastned's "main" activities for our Climate Transition Plan, it is important for Fastned to reduce these as well.

Progress pathway

- 2024 baseline: 58.80 tons CO2e/GWh
- 2027 target: 57.62 tons CO2e/GWh (2% improvement)
- 2030 target: 23.72 tons CO2e/GWh (60% total improvement from baseline)

How short-term supports medium-term

The short-term target builds the foundation needed for the more ambitious 60% intensity reduction by 2030. The 2025–2027 period focuses on establishing supplier partnerships, piloting new technologies, and implementing initial design improvements that enable larger-scale transitions in 2028–2030.

Trias Energetica application

Our targets prioritize CO2 reductions that also reduce energy consumption:

Step 1 - Reduce energy demand first:

- Construction: Optimize station designs to use less CO2-intensive materials (reducing embodied energy)
- Equipment: Prioritize high-efficiency chargers that reduce energy losses; deploy batteries to reduce grid congestion
- Operations: Improve office energy management to reduce gas and electricity consumption
- Business travel: Reduce travel demand through digital meetings and modal shift to trains

Step 2 - Use renewable energy:

- Establish direct renewable energy sourcing via PPAs with solar parks and wind turbines
- Maintain 100% renewable electricity procurement via GoOs.

Step 3 - Cleaner alternatives (transition):

- Business travel: Purchase SAF to reduce flight impact until electrification becomes viable
- Construction: Use cleaner fuels (HVO) for construction equipment until full electrification is possible

4.2 Short-term energy targets (2027)

Energy intensity reduction

Reduce energy consumption intensity by 5% from 46.3 GJ per million euros revenue in 2024 to 44 GJ per million euros revenue by 2027.

Supporting data:

- Total GJ energy consumption 2024: 3983 GJ
- Total revenue 2024: 86 million EUR
- Total GJ / Total revenue = 46.3 GJ/million EUR
- 46.3 x 0.90 = 41.7 GJ / million EUR (10% reduction)

Renewable energy

Maintain 100% renewable electricity through GoOs and REGOs for all operational consumption (offices, stations, EV fleet) through 2027.

Self-generation and storage

- **Storage**: Pilot battery storage solutions at selected stations by 2027 to test grid flexibility capabilities
- **Self-generation:** Continue to install solar PV panels at new stations where technically and economically feasible

Contribution to medium-term targets

The 5% short-term energy intensity reduction target serves as a mid-point milestone in 2027 as we work to achieve our medium-term target of 10% reduction in 2030. Primary energy use comes from office heating and electricity, as well as powering Fastned's EV fleet.

Sector comparison

Direct comparison with peers is not possible as energy intensity targets are a new requirement in this handbook version. Fastned's 10% reduction aligns with broader industry energy efficiency improvements.

4.3 Concrete measures and responsibilities

Category A, B and C measures are defined by SKAO on page 10 of the CO2 Performance Ladder handbook 4.0:

- Category A: This refers to a 'standard' step of implementation. This means that more than 50% of the organisations for whom this measure is relevant have implemented it.
- Category B: This involves a 'progressive' step of implementation. This
 means that 20% to 50% of the organisations for whom this measure is
 relevant have implemented it.
- Category C: This involves an 'ambitious' step of implementation. This means that only a few organisations have implemented this measure (at most 20%).

Construction and engineering measures

Optimize foundation designs

- Timeline: Piloted in 2024; Ongoing
- Responsible: Materials & Engineering (M&E)
- Expected impact: Material reduction per station, ~1-2 tons CO2/station
- Status: Ongoing, expand to other markets
- Category: B measure

Pilot screw foundations for tiny shops

- Timeline: Q3 2024 (pilot); Ongoing (as much as possible, country-permitting)
- Responsible: M&E / Supplier
- Expected impact: Concrete reduction thanks to use of non-traditional foundation material, ~100 kg CO2/shop foundation
- Category: C measure

3D-printed infotainment screen foundations

- Timeline: Piloted in H2 2025; Ongoing
- Responsible: M&E
- Expected impact: [Redacted]
- Category: C measure

New design of steel station elements

Timeline: H2 2025; Ongoing

• Responsible: M&E

• Expected impact: [Redacted]

• Category: B measure

Use cleaner fuels (HVO) for construction equipment

- Timeline: Q4 2025 onward (with subcontractors)
- Responsible: Construction / Sustainability
- Expected impact: Reduced construction phase emissions, ~0.5-2.8 kg
 CO2/liter fuel used (depending on HVO mix)
- Category: B measure (transition measure)

Equipment procurement measures

Roll out batteries to more stations

- Timeline: Q12025-Q42027 (phased deployment)
- Responsible: Network Operations
- Expected impact: Reduced grid congestion during peak hours, flexibility improvement
- Category: B measure

Engage suppliers on equipment footprint

Timeline: OngoingResponsible: M&E

• Expected impact: Data gathering for future procurement decisions

Category: B measure

Business travel measures

Promote train over plane for business travel

Timeline: Q1 2025; Ongoing

Responsible: HR / Sustainability

 Expected impact: Increased train usage, reduced flights, ~72 kg CO2/trip (for a 500 km journey)

• Category: C measure

Purchase SAF for business flights

Timeline: H1 2026 pilot program
Responsible: HR / Sustainability

- Expected impact: Reduced flight emissions until electrification viable, ~81-111 kg CO2/passenger/1,000 km flight taken
- Category: B measure (transition measure)

Renewable energy measures

Establish PPAs

- Timeline: Ongoing (since 2024)
- Responsible: Energy Sourcing/Finance
- Expected impact: Direct renewable energy sourcing, long-term supply security
- Category: C measure (strategic measure)

Maintain renewable electricity procurement via GoOs and REGOs

- Timeline: Ongoing
- Responsible: Energy Sourcing / Sustainability
- Expected impact: Zero market-based emissions for operational electricity
- Category: B measure (baseline commitment)

4.4 Sector comparison and self-assessment

Ambition justification

Achieving 5% intensity reduction is challenging during rapid growth. We're opening 40+ stations annually, expanding offices, and hiring more staff—all increasing absolute energy consumption. To hit our intensity target, we must improve efficiency faster than we're growing. Revenue must outpace energy use significantly, which is difficult in our expansion phase.

Additionally, our 5% energy intensity reduction (1.66% annually) exceeds the EU Energy Efficiency Directive's minimum 1.49% annual improvement requirement for 2024–2030.

Relevant peer organizations

For comparison purposes, Fastned considers the following organizations relevant based on sector overlap (charging point operators, construction, equipment suppliers):

Charging point operator peers:

- o **Allego** reported 10.4% annual intensity reduction (2023); Fastned's 11% over 3 years (3.7% annually) is comparable to Allego despite our heavier scope 3 profile and limited supplier leverage
- o **lonity** has no specific targets
- Construction/equipment peers
 - o **BAM, ABB and Schneider** target 25–50% scope 3 reductions but over longer timeframes (vs 2015–2021 baselines)

Measure focus

Fastned's CO2 emissions reduction measures focus primarily on:

- Capital goods (construction materials and processes)
- Passenger mobility (business travel)
- Energy sourcing and management (renewable procurement, battery storage)

Limited direct control over equipment manufacturing emissions due to supplier constraints. Focus is on supplier engagement and procurement criteria rather than manufacturing process changes.

Mijn CO2 Prestatieladder self-assessment

Completed on 16 October.

Based on measure types and categories:

- Measure distribution: 28% A measures, 31% B measures, 41% C measures
 - o # A measures: 8
 - o #B measures: 9
 - o #C measures: 12
- CO2 intensity comparison: (See "relevant peer organizations" section above)
- Self-assessment: Fastned considers itself a frontrunner, as it is one of-if not the only-CPO in the industry that has set both ambitious relative and absolute targets, and that it measures its entire footprint (including scope 3). Fastned is also the only CPO that participates in certifications like the CO2 Performance Ladder and B Corp.