

## REPowering the EU with a realistic F-gas regulation

On 5 April 2022, the European Commission made a legislative proposal to revise the F-Gas Regulation in line with the [European Green Deal](#), the [European Climate Law](#) and recent international obligations under the [Montreal Protocol](#).

The power industry fully embraces the European Commission's decarbonisation objectives and its ambition to cut F-gas related emissions as a step towards climate neutrality. The European DSO and wind industry are both committed to adopting a sustainable approach, and consequently support the phasing out of SF<sub>6</sub>-based technologies **in a timely and realistic manner while ensuring the crucial safety and reliability of the EU electricity grid.**

**At the same time Europe needs a rapid and continuous expansion of its electricity networks to deliver its decarbonisation objectives. Any delay will negatively affect the deployment of renewable electricity generation essential to achieving climate neutrality.** By 2030 the EU already needs 750 GW of wind and solar capacity installed.

### Achieving the EU's sustainability AND decarbonisation objectives is only possible if:

#### 1. At least two efficient alternatives to SF<sub>6</sub> are made available:

- Switchgears can be supplied in a timely fashion for the massive rollout of renewables and continuity of supply
- Competition is ensured
- SF<sub>6</sub> is phased out
- GWP is in any case reduced by at least 97% (C4-FN & C5-FK mixtures, Air / vacuum)

What you can do:

- ⇒ Specify "market availability" and "technology maturity" alongside "technical" exemption grounds

**[ENVI AM 366 combined with 369, 556, 557, 558 supported]**

- ⇒ For high voltage equipment (> 52kV), allow a unique GWP threshold of 1000

**[as seen for example in ENVI AM 650]**

#### 2. Equipment already installed remains repairable and maintainable until the end of its designed life

What you can do:

- ⇒ Exclude spare-parts from the SF<sub>6</sub> ban

**[ENVI AM 198, 357 and 555 supported]**

- ⇒ Do not limit repair and maintenance of spare-parts in time

### 3. Projects that are already at an advanced stage of development and/or their permitting are not endangered

What you can do:

- ⇒ Make sure the “Placing on the market” definition refers to a project status rather than to a date

**[ENVI AM 336 supported]**

### 4. Leak checks are fit-for-purpose and do not cause additional harm

Imposing annual leakage measurements for electrical switchgear and circuit breakers will require dismantling and testing millions of pieces of critical electrical infrastructure. This will render much of Europe’s electricity generation and distribution equipment idle and will very likely cause F-gas (SF<sub>6</sub>) and other emissions to rise due to leakage when dismantling the equipment and the associated logistics (shipments to test labs).

What you can do:

- ⇒ Impose the new equipment to respect the sealed pressure equipment IEC standard
- ⇒ Avoid risky leakage measurement obligations (e.g. as triggered by AM 264)

Our four associations express our strong support for the four above principles.

We remain at the disposal of the co-legislators to further assist in clarifying these recommendations for the success of the F-Gas Regulation revision.