

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](#).

Europe's power industries fully embrace the European Commission's decarbonisation objectives and its ambition to cut F-gas related emissions as a step towards climate neutrality. We are committed to adopting a sustainable approach in our activities and support the phasing out of SF₆-based technologies in the EU's power grid.

The SF₆ phase-out must be done in a timely and realistic manner to ensure the crucial safety and reliability of the power grid. When available, we are committed to using SF₆-free equipment for new installations and to replacing the equipment in existing installations with SF₆-free solutions when those reach the end of their operational life.

At the same time Europe needs a rapid and continuous expansion of its electricity networks to deliver its decarbonisation objectives. By 2030 the EU already needs to have installed and connected 750 GW of wind and solar capacity. To ensure the timely deployment of switchgears and other necessary grid equipment, technologies should be made available on the market in sufficient numbers and with certainty for each voltage level.

The F-gas regulation should therefore focus on promoting the deployment of new technologies in new projects, while allowing existing equipment to continue to operate until the end of its useful life. Premature dismantling due to maintenance, servicing, or repair stop-dates and retro-active requirements for existing installed equipment will cause significant bottlenecks in supply disruption and lead to delays in the roll-out of decarbonised heating, transport, and renewables.

Any retroactive measure on existing installations will negatively affect the future deployment of renewable electricity generation. This will make it harder to achieve climate neutrality in time. Therefore, we must ensure that the measures required to phase out SF₆-based equipment complement the EU's climate and energy ambitions and do not jeopardise current DSO operations, risk the security of supply nor delay the planned connection of new generation assets.

Achieving the EU's sustainability AND decarbonisation objectives is only possible under the following conditions:

1. **Equipment already installed remains repairable and maintainable until the end of its designed lifespan: there shall be no stop-date to the repair, maintenance nor servicing of existing equipment**

What you can do:

- ⇒ Exclude spare-parts from the F-gas ban
- ⇒ Do not limit repair and maintenance in time notably with an ultimate ban date of spare-parts.

2. **Tendering process and availability of the equipment must be at the center of the reasoning to make Europe's decarbonisation achievable so that:**
 - Switchgears be supplied in a timely fashion for the massive rollout of renewables and continuity of supply
 - Competition be ensured
 - SF₆ be phased out

What you can do:

- ⇒ Refer to tendering process, technical and sufficient supply availability
- ⇒ For high voltage equipment (> 52kV), set a unique GWP threshold of 1000

3. **Leak checks must be fit-for-purpose and 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 (SF₆) and other emissions to rise due to leakage when dismantling the equipment and the associated logistics (shipments to test labs).

What you can do:

- ⇒ Keep art. 5§1 as is with the a), b) and c) provisions
- ⇒ Impose the **new** equipment to respect the sealed pressure equipment IEC standard
- ⇒ Avoid risky leakage measurement obligations

We express our strong support for the three 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.



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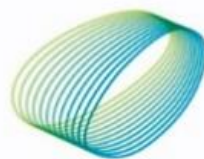
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