



## **Empowering electrification: the energy industry coalition's call for coherent F-gas regulation ahead of the 5 October trilogue**

The electricity industry and users appreciate the Council's direction and efforts to support the clean electrification of the EU by creating favourable conditions for switchgear production and operation. Switchgear plays a vital role in securing the electric grids, and millions of units will be needed to meet the EU's decarbonisation goals.

Whether the decision is to reduce global warming potential (GWP) or ban fluorinated gases (F-gases), the electricity industry wants to assure legislators that, whenever possible, equipment will be SF<sub>6</sub>-free. However, if the market fails to provide technically fit, timely, and reasonable solutions with lower GWP or non-F-gas alternatives, this should not impede decarbonisation.

Hence, we strongly encourage legislators to align with the following essential positions:

- **The derogation scheme, also known as the "cascading principle," must be upheld for all voltage levels.**
  - There should systematically be a minimum of two independent manufacturers for the same technology, with adequate industrial capacity to promote competition and ensure quality and consistency of supply.
  - Exemptions should be available through a notification procedure based on a technical assessment, non-disproportionate costs, supply availability and the avoidance of monopolistic situations.
- **Any equipment that was rightfully placed on the market or ordered through a procurement procedure initiated before the ban date should be exempt from the F-gas regulation ban.**
- **To avoid that the entire electrical equipment should be replaced, the extension (or expansion) of switchgear must be facilitated with the possibility of adding cells with the same GWP as the existing cells in the equipment.** This will ensure environmentally friendly electrification and minimise resource waste, in line with circular economy principles.
- **All other points should be maintained as per the Council's latest proposal**, including leak checks as per current regulation, maintenance, and servicing conditions.
- **Life cycle assessment and circular economy approaches should be the guiding principles when deciding on equipment installation, maintenance, or replacement.** The energy efficiency of switchgear cannot be limited to its operation phase because of the nature of the equipment.
- **Consistency among legislations must be ensured:** the upcoming revision of the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) and consultations on per- and polyfluoroalkyl substances (PFAS) should be conducted in light of the discussions and decisions made during the revision of the F-gas regulation.