

# Reply to the evaluation roadmap/ inception impact assessment on F-gases

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A Eurelectric response paper

September 2020

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

### We stand for

The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

**investing** in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

**transforming** the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

**accelerating** the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

**embedding** sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

**innovating** to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

Eurelectric welcomes the publication of the combined Evaluation Roadmap and Inception Impact Assessment on Fluorinated gases (F-gases). **The European power sector supports the EU commitment to reduce the global greenhouse gas emissions towards the achievement of climate neutrality by 2050**, as part of the European Green Deal objectives, and is willing to commit further efforts to reduce F-gas emissions as far as possible.

The combined Evaluation Roadmap and Inception Impact Assessment emphasizes the importance of developing climate-friendly technologies that may permit further emission savings in support of reaching the European Green Deal objectives more easily. Avoiding emissions from F-gases is indeed key to reaching these objectives. In this context, distribution system operators (DSOs) are keen to consider SF<sub>6</sub>-free alternative products for electrical switchgears. Nevertheless, further development and testing is still needed to **ensure the availability of cost-effective, technically feasible and reliable alternative products** to SF<sub>6</sub> on the market.

The concretization of an **industrial offer adapted to distribution network operators' needs** is a prerequisite to shift away from SF<sub>6</sub> use. Alternative products must be able to ensure operational standards whereby meeting identical technical and safety requirements as SF<sub>6</sub> products (e.g. with regard to toxicological risk). The industrial offer should establish competitive dynamics between suppliers and other market actors.

In this regard, **financial incentives in the short-term and stable regulatory frameworks in the medium-term** could encourage and foster the progressive adoption of SF<sub>6</sub>-free products by compensating additional costs for the development and field testing of pilot projects. These would also allow National Regulatory Authorities (NRAs) to review the effectiveness of the policy measures. Eurelectric is therefore supportive of research and innovation programs (such as Horizon Europe) **fostering experimentation and cooperative ventures between DSOs and equipment manufacturers**, instrumental to the development and market-maturity assessments of alternative technologies. These measures will help paving the way for a widespread use of alternative technologies which could substitute SF<sub>6</sub> switchgear in the future.

Considering the average lifetime of 40 to 50 years of a switchgear, switchgears using SF<sub>6</sub> currently installed will remain in operation for several decades. To ensure the functioning of the grid and **maintain security of supply**, the availability of SF<sub>6</sub> for maintenance and repairs must be ensured over the full technical lifetime of the current fleet of SF<sub>6</sub> switchgears. Furthermore, for some fields of applications, especially in urban areas where space is limited, it will remain difficult to replace SF<sub>6</sub> switchgear because it offers the most compact technological switchgear solution.

Eurelectric believes that **further progress can be achieved** in deep leakage detection by focusing efforts on not sealed, relevant emission rate equipment as well as in the management of SF<sub>6</sub> switchgear's **end-of-life**. In particular, an inventory of the fleet in operation in each Member State should be required in order to **gain a clearer picture on the usage of SF<sub>6</sub>** and provide an adequate overview of the actual situation in real-life applications. To effectively contribute to the reduction of greenhouse gas emissions and to avoid manufacturing of new SF<sub>6</sub>, obligations to **strictly monitor SF<sub>6</sub> leakages and to collect SF<sub>6</sub> at the end-of-life of a switchgear** could be reinforced, calling on specialised industry actors to manage the decommissioning of SF<sub>6</sub>—materials and equipment.

Such measures will be key to facilitate a successful development and large-scale deployment of alternative solutions supporting DSOs and other industry actors in their mission to safely and



reliably distribute power to citizens and communities throughout the Union, while achieving the goal of climate neutrality by 2050.

Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

- Growth, added-value, efficiency

Environmental Leadership

- Commitment, innovation, pro-activeness

Social Responsibility

- Transparency, ethics, accountability



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