



## Joint position paper on the F-Gas Regulation revision

On 5 April 2022, the European Commission made a legislative proposal to update the F-Gas Regulation to align it 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 emissions. The DSOs and generators that we represent are committed to adopting a sustainable approach to the development and operation of their assets and thus to using SF<sub>6</sub>-free electrical equipment for new installations. Consequently, we all support the phasing out of SF<sub>6</sub>-based technologies after a transition period that varies by voltage level.

To further decarbonise the sector, the Commission's REPowerEU plan intends to add 750 GW of wind and solar PV generation by 2030, 70 % of which will be connected to distribution grids. Meanwhile, REPowerEU could increase electricity demand by 100 TWh in the next five years, which is unprecedented in European history. This will strain the grid even more.

Hence, we must ensure that the measures required to phase out SF<sub>6</sub>-based equipment will not jeopardise DSO operations, security of supply or the connection to the network of ever more EVs, heat pumps and renewables. **The Regulation should not undermine the EU's decarbonisation process.**

Consequently, the power industry sees the following suggestions as essential if Parliament is to enhance the Commission's proposal:

1. **The Regulation should not limit competition in the EU. There must be at least two manufacturers, with sufficient delivery capacities, providing solutions that fulfil common quality requirements and are tested by at least two pilot applications.** We raise concerns that only one European manufacturer can provide a solution for high voltage levels that meets the proposal while its criteria could result in a technology monopoly.
2. **The ban date for 12 to 24 kV (12 kV excluded) voltage level switchgear should be extended from 2026 to 2028.** Indeed, we are deeply concerned that manufacturers will not be able to supply enough SF<sub>6</sub>-free switchgear by 2026 on this specific voltage level.
3. **The global warming potential (GWP) threshold on voltage levels above 24 kV should be revised from 10 to 1000** since it will exclude meaningful and worthwhile technologies which significantly reduce greenhouse gas emissions in comparison to SF<sub>6</sub>.
4. **The Regulation should be consistent with the EU Chemicals Strategy for Sustainability** given some alternative technologies are based on gases containing substances currently under regulatory assessment.
5. **The operation, maintenance and repair of SF<sub>6</sub>-based equipment, and parts thereof, until the end of their lifetime should be allowed** to ensure the sustainability of network and generation assets.

CEDEC, E.DSO, Eurelectric, Geode 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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