

Brussels, 5 May 2023

*Attached: "4 column" document with the coalition's & Eurelectric's recommendations*

Dear National Representative,

We are writing to express our appreciation for the **pragmatic** approach you have adopted in the F-gas regulation. We are proud to be part of an industry that is committed to sustainability and is working towards a **better-performing grid for the electrification of the EU**. We thank you and congratulate you for the **realistic** propositions you have made to phase out SF<sub>6</sub> based technologies in the EU's power grid. Where technically feasible and each time they are available, we are committed to using SF<sub>6</sub>-free technologies for new installations, and to replacing the equipment in existing installations with SF<sub>6</sub> free solutions when those reach the end of their operational life.

We believe that **for the grid to be fit for reaching Europe's target of integrating gigawatts of heat pumps, RES and EV charging stations, Europe needs millions of switchgears to be operational and developed**. Therefore, to make the F-gas regulation even more performant, we have three remaining key points in the framework of the ongoing interinstitutional negotiations that need urgent attention:

- Firstly, we urge you to take into account the **indispensability of the grid's availability and security to deploy electrification**. The solutions must be considered under **the greater good of decarbonisation**.  
i.e. Annex IV §2 (EC) / art. 13.5 (aa) and art. 13.5 (ac) must provide exemptions in case there is no suitable alternative, no technically fitting solution, or no proper bidding conditions (2 independent manufacturers with tested solutions), on a permanent basis.
- Secondly, **leak checks should be fit-for-purpose and not cause additional harm to the EU's decarbonisation process and energy independence**.  
i.e. the exemptions contained in art. 5 must remain "as is" in the existing regulation (and in the Commission's proposal) with reference to points a), b) and c), as these exemptions have been inserted for technical feasibility reasons. Removing point c) from art. 5§1 will bring no environmental benefit – on the contrary.
- Finally, it is essential to **extend or expand the switchgears** in order to achieve the most environmentally friendly electrification while minimizing resource waste. Indeed, phasing out existing equipment to make it more powerful will be counterproductive and go against circular economy principles. It will also create a security of supply issue and bottleneck the rollout of renewable energy sources, endangering the stability and reliability grid. If the grid fails, no electrification is possible. By continuing to use and adapt existing equipment, the European industry can ensure a stable energy supply while gradually transitioning towards newer, more efficient technologies.

We also urge you to protect the **consistency of legal frameworks and legal certainty** by ensuring coherence between the F-gas regulation, REACH, and the **taxonomy**, mainly relying on scientific observations and market availability assessments.

Thank you for your time and consideration. We remain at your entire disposal to further discuss the content of the present letter.

Kristian Ruby, Secretary General

