

June 2022

UFE's reply to the public consultation on the [proposed F-gases Regulation](#)

The French Electricity (UFE) supports the F-gases Regulation as a key piece of legislation to cut down emissions from F-gases with a very high global warming potential. Grid operators and electricity producers are committed to operating and developing their activities in a way which is compatible with the EU's decarbonisation objectives. UFE thanks the Commission for the possibility to share its analysis and recommendations on the proposal for revision of the F-gases Regulation.

1. Placing on the market prohibition

According to annex IV of the proposal, a placing on the market prohibition will be introduced for electrical switchgear from 2026, 2028, 2030 or 2031 depending on the voltage. If relevant and widespread solutions already exist for voltage levels up to 12kV, a full range of solutions covering voltages up to 24 kV still needs to be developed.

- For voltage level 12-24kV, a transition time up to 1st January 2028 would be more appropriate, considering the existing market deployment.

2. Scope of the prohibition

Within the principle of the circular economy and considering the life-cycle assessment of GHG emissions, the proposed Regulation should ensure that an equipment can be used until the end of its lifespan. The Regulation should also acknowledge that retrofitting of existing installations would trigger heavy investments or may not be possible, due to constraints related to ground coverage, limited size of premises, security, or compatibility of the equipment with existing installations.

- Therefore, **placing on the market prohibitions should be strictly limited to new installations, and the starting date of the placing on the market prohibition should clearly refer to the date of signature of the contract.**
- In order not to jeopardise the safety of generation, transmission and distribution of electricity, the exception framework must allow **spare part solutions to be kept on the market for repair,**

maintenance and extension purpose.

3. Assessment of alternative solutions

The revised Regulation should ensure innovation in clean alternative technologies, guarantee a sufficient production level to match EU industrials' needs, and avoid the creation of dominant positions. Therefore:

- The progressive ban on SF6 should be conditioned to **the existence of at least three manufacturers of SF6-free equipment for each voltage level**. This will also help mitigate technical risks, in the event of the failure of one supplier's equipment or technology.

Assessment methods taking into account GHG emissions, raw materials, energy efficiency, as well as human health and biodiversity already exist, and are being standardised. When considering alternative solutions, the Regulation should therefore consider several criteria:

- Alternative solutions should not only be assessed based on their technical specifications and GWP during exploitation. **Toxicity and ecotoxicity impacts should also be taken into consideration, as well as GHG emissions calculated using a lifecycle assessment** encompassing the equipment and its support structure. Furthermore, it is essential that these alternative technologies can meet the operational, technical and safety requirements required to replace existing equipment. Economical aspects should also be taken into consideration, especially if alternative solutions entail disproportionate costs.
- The double GWP threshold applied in Annex IV(23) brings confusion to system operators. Considering the existing state of the art, **a unique reference to a GWP of 10 should be maintained for voltage levels up to 24kV, and a unique reference to a maximum GWP of 2000 should be introduced for higher voltage levels**, to allow solutions with the best life-cycle analysis.
- **Consistency between the EU Chemicals Strategy for Sustainability and the F-gases Regulation must be ensured**, to avoid adopting solutions that may be removed later on.

4. Exception framework

According to art.11(2), an equipment won't be subject to the placing on the market prohibition if it shows lifecycle GHG emissions lower than those of an alternative solution, due to higher energy efficiency.

- **To properly reflect the GHG emissions of an equipment, UFE recommends deleting the specific mention of energy efficiency, and use the overall lifecycle GHG emissions of the equipment and its supporting structure.**

The proposed exception framework in art.11(4) may be too lengthy and could delay the examination of certain cases due to heavy administrative procedures, especially where new implementing acts

have to be adopted.

- **As a more rapid and flexible alternative, UFE recommends relying on national competent authorities to assess exceptions to the placing on the market of equipment for which there are no mature alternatives.**

5. Heat pumps

Annex IV introduces placing on the market prohibitions as of 2025 and 2027 for heat pump equipments using HFC.

- **UFE warns against the risk of shortage due to such tight deadlines, which would jeopardise the achievement of the Renovation Wave and REPowerEU objectives.**
- The replacement of HFC by substitution fluids could also bring additional costs, which might be passed on to customers.