

Brussels, 18 July 2013

**Proposal for a  
Regulation of the European Parliament and of the Council on fluorinated greenhouse  
gases (COM(2012)643 final)**

**T&D Europe<sup>1</sup> Statement  
regarding the timeframe for an assessment on SF6 switchgear technology**

- T&D Europe fully understands the necessity of periodically assessing the technological progress concerning SF6-free alternatives.
- However, any near-term deadline would not bring added value because the assessment of time that would be necessary for the European electrical switchgear sector (dealing with secure and reliable electricity supply as well as safety of personnel) to further evaluate safe and reliable alternatives and establish track records results in a timeframe around 2024.
- Claims about existing alternatives are misleading the discussion because the alternatives are technologically immature and financially uneconomic.

**T&D Europe member companies are technological leaders**

T&D Europe, as a key actor for the development of the European electricity grid is used to cooperating with grid operators and with European and National Institutions in order to optimize the transmission and distribution of European electricity in the interest of industry and the public.

The European electrical switchgear manufacturing sector (particularly the companies within T&D Europe) is a leader in the international market. This position is based on technological leadership and maintained by a systematic permanent programme of high level R&D projects.

**Electrical switchgear's SF6 technology ensures secure and reliable electricity**

For many applications and particularly in public electrical power distribution, SF6 technology is essential to ensure a secure and reliable electrical network in Europe. Replacement of SF6 technology in electrical switchgear requires considering the huge number of different situations and applications in which SF6 is currently used, such as public power distribution in urban or rural areas, skyscrapers, wind farms and industrial applications (e.g. steel mills, oil & gas, mines, subsea substations, refineries and the paper industry).

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<sup>1</sup> T&D Europe ([www.tdeurope.eu](http://www.tdeurope.eu)) is the European association of the electricity transmission and distribution equipment and services industry, which members are the European national associations representing the interests of the electricity transmission and distribution equipments manufacturing and derived solutions. The companies represented by T&D Europe account for a production worth over € 25 billion EUR, and employ over 200,000 people in Europe.

## **Claims about existing alternatives are misleading the discussion**

In terms of search for alternatives to SF<sub>6</sub>, a certain number of SF<sub>6</sub>-free products were recently launched by T&D Europe companies, demonstrating the sector's commitment to continuous efforts and investments in R&D.

These technologies, however, cover only a selective number of applications and are therefore suitable only for niche, inconsiderable markets, unable to satisfy global demand for applications in electrical equipment. Alternative technologies which are currently being developed are immature and do not meet all the requirements related to reliability, pollution, climate and extreme weather conditions. Additionally, the assessment conducted by Öko Recherche for the European Commission demonstrates excessive abatement costs, making these alternatives uncompetitive and not economically viable.

## **Technologies must be duly proved**

The electrical equipment installed in the network is designed to operate for about 40 years with high requirements on the power supply's reliability and continuity as well as on the safety of people and sustainability of assets. Experience shows that technological innovation must be duly proved not only in laboratories but also in field applications. Bad experiences exist with significant mistakes that arose because technologies were deployed too early (such as polychlorinated biphenyl (PCBs) for transformers). Despite the huge investments made by the whole T&D sector in research, results demonstrate that no alternative technology in sight within medium term is viable, reliable and capable of fulfilling the required functionality in the relevant field conditions (flooding, atmospheric pollution, etc...).

The electrical switchgear sector needs time to further evaluate safe and reliable alternatives and establish track records from applications in the field.

## **European manufacturer's leading positions are at risk**

T&D Europe fully understands the necessity of a periodical assessment of the technological progress as proposed by the European Parliament's ENVI Committee on 19<sup>th</sup> June 2013. However, any near-term deadline would not bring added value and would be politically misleading. It would create the risk of introducing irresponsible dangerous market distortions, jeopardizing the leading position of a European industry sector that is intensive in R&D, exports outside EU and ensures employment in the EU.

**In conclusion**, taking into account the time needed to develop solutions, to industrialize, to test extensively and to establish track records confirming the viability of the solutions, an assessment by 2024 seems more reasonable and T&D Europe strongly advises against earlier assessment.