

T&D Europe position paper on EC Proposal for a Regulation of the European Parliament and of the Council on fluorinated greenhouse gases (Brussels, 7.11.2012 COM(2012) 643 final 2012/à305 (COD))

15.02.2013

Executive summary

The Electricity Transmission & Distribution Equipment and Services Industry, represented by T&D Europe¹, supports the fundamentals of the EC Proposal to revise the F-Gas Regulation. One of the objectives of the European Commission as stated in the Explanatory memorandum is to simplify and clarify Regulation (EC) No 842/2006 to reduce administrative burden in line with the Commission's commitment to better regulation.

The F-gas Regulation is purposed to embrace all fluorinated gases. However, as can be concluded from the attention paid on elaborating on the newly drafted proposal, it becomes evident that the new and stricter F-gas regulation is required to gain control over the explosive growth of HFCs. On the contrary, the current F-Gas Regulation has proven to be perfectly adequate to control and mitigate SF6-emissions from the electrical energy sector, explained by its usual and continuous proactive approach, e.g. voluntary agreements and evolving technologies (lesser volumes and better tightness).

Various paragraphs of the regulatory text contain details that only have relevance to HFCs, such as four levels of training. It is clear that in the case of electrical switchgear sector, some of the current proposed requirements, for example on record keeping and reporting are not practical and include unnecessary administrative burden. The same performance and safety level will be realised but with extra administration and hence costs for construction and operations and maintenance and hence end customer with no difference for the main target that is to control and minimise the emission of fluorinated greenhouse gases into the atmosphere.

Therefore, T&D Europe considers a few amendments to be highly relevant to provide clarifications and simplifications, in line with the original objectives of the European Commission

Introduction

T&D Europe is the European Association of the Electricity Transmission & Distribution Equipment and Services Industry, representing the European manufacturers of technology and providers of service solutions for the transmission and distribution of electricity in Europe and globally. We are actively engaged with the development of the EU energy policy, the completion of its 20/20/20 objectives for

¹ www.tdeurope.org

2020 and the preparation of a strategy for 2050. The companies represented by T&D Europe account for a production worth over € 25 billion EUR, and employ over 200,000 people in Europe.

Electrical switchgear are key elements of Transmission and Distribution Grids

Companies within the scope of the Association design, manufacture, install, service, maintain, repair and decommission HV electrical equipment, which are essential components of the transmission and distribution electricity networks. Different technologies are used in transmission and distribution of a voltage range greater than 1 kV to provide a reliable supply of electricity for society and industry. The different technologies compete in the market on environmental, technological and economic basis. The technology choice is made using a set of criteria, mainly such as compactness, insensitivity to environmental conditions, low maintenance, reduced cost, environmental impact.

The best available technology is needed for EU 20/20/20 targets

In this context the gas SF6 is broadly applied not only in Europe but all over the world as well. It appears that for many applications, SF6 technology is the best solution, technically and economically wise, without equivalent substitutes, as in those applications it allows the optimized operation of electrical switchgear and electricity network, ensuring reliability of electricity supply SF6 has remarkable advantages in current breaking and insulation of live parts:

- High capacity of isolation and current breaking
- Compactness
- High reliability
- Insensitivity to harsh environmental conditions
- Sustainable use of resources
- High safety of personnel
- Energy efficient

Then, the application of SF6 in medium voltage, high voltage and very high voltage systems is frequently needed for the on-going modernisation of the EU electricity grid, which is widely recognised as a key building block for the completion of the EU 20/20/20 targets.

On the other hand, technological developments in the field of SF6 containment such as sealed for life equipment and optimized handling resulted in continuing emission reduction. State of the art equipment have extremely low emission rate, whose limits are defined in IEC international standards. A closed loop for SF6 re-use at switchgear end of life is ensured by manufacturers as well as specialized companies. When electrical switchgear is reaching its end of life, it is not the end of life of SF6 contained therein. SF6 is recovered, returned to the gas producer or distributor and reprocessed for re-use in new switchgear. A total of 98% of returned SF6 is finally reusable in new SF6 containing switchgear.

The European Regulatory Framework points the way

This gas is inert, non toxic and not depleting for the ozone layer but presents a very high GWP. For this reason, SF6 was listed in the Kyoto Protocol as a gas to monitor. Therefore the industrial sector represented by T&D EUROPE is considering with great care the application of SF6 as above mentioned. In fact all European companies manufacturing SF6 based products have been taking, successfully,

voluntary actions to reduce SF6 emissions since 1995 well in advance of any legal compulsory requirement. A comprehensive and efficient reporting system has been established in some countries and has shown the positive impacts of these commitments.

In 2006, was issued the European REGULATION (EC) No 842/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 17 May 2006 on certain fluorinated greenhouse gases. SF6, as other fluorinated greenhouse gases is covered by this regulation. However, the electricity sector using SF6 in electrical switchgear has many specificities, compared to refrigerant sectors using other gases. In several occasions, T&D Europe has demonstrated its support to the European regulations concerning fluorinated greenhouse gases. Complementing the Regulation (EC) 842/2006, other European regulations have been issued in 2007 and 2008 for labelling, reporting and training and certification. Today, personnel in charge of SF6 recovery shall hold a certificate according to Regulation (EC) 305/2008. This training and certification programme leads to a high qualification of personnel and to a very low level of handling losses.

As today the regulation on fluorinated greenhouse gases is under revision process, T&D Europe would like to express its support to the 2050 EU objectives to reduce greenhouse gas emissions by 80% to 95% versus 1990. The new regulation will be an efficient tool to reach these objectives.

In conclusion, due to the specificities of the electrical switchgear sector, practical aspects should be taken into account in the final text, while keeping the same objectives. In order to make the revised regulation more efficient and easier to implement, T&D Europe will submit separately a list of amendments, for example on prevention of emissions, record keeping, reporting and training & certification.