

T&D Europe Statement to the EU Council on the Draft EU Regulation on F-Gases

Brussels, 6 May 2013

Background

The EU Environment Council is currently discussing in first reading the draft regulation on fluorinated gases (repealing Regulation EC842/2006), which the European Commission proposed on 7 November 2012.¹

General Position

As T&D Europe² we support EU measures to minimise the emissions from fluorinated greenhouse gases, which have a considerable global warming potential.

However, the use of one of these gases - SF₆ - is currently still indispensable to safely operate electrical switchgear and circuit-breakers, which are absolutely necessary for operating the electricity grid. Only with SF₆, can switchgear and circuit-breakers be operated in densely populated or environmentally challenging areas (such as offshore applications).



Note: These pictures – taken from arc fault demonstration tests under laboratory conditions – illustrate the perils of high voltage insulation defects while using immature technologies. On the contrary, SF₆-technology has successfully demonstrated operational safety since more than 40 years.

Europe needs optimal conditions for maintaining and enhancing its electricity grid, if it wants to reach its climate and energy goals. Switchgears and circuit breakers use SF₆ merely as an encased insulation gas and for internal arc quenching means. It is therefore not released into the atmosphere if correctly handled and, in consequence, greenhouse gas emissions from SF₆ in electrical equipment have been negligible in Europe.

¹ http://ec.europa.eu/clima/policies/f-gas/legislation/docs/com_2012_643_en.pdf

² T&D Europe is the European Association of the Electricity Transmission and 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 2020 and the preparation of a strategy for 2050. The companies represented by T&D Europe account for a production worth over Euro 25 billion, and employ over 200,000 people in Europe.

A global trend towards SF6-insulated switchgear can be noticed. Therefore, prohibiting SF6 in the EU unilaterally might even lead to an increase in global greenhouse gas emissions because other, non-European producers would meet this demand at the expense of European industry and their leading SF6-optimized technologies.

The current regulation provides an adequate emissions control instrument for SF6. In addition, self-commitments by producers of SF6, electrical equipment manufacturers as well as its users exist in a number of Member States and have proven to be successful. For these reasons, the revision of the F-gas regulation should keep the existing level of containment measures on SF6 for switchgear and circuit-breakers.

At this point in time, T&D Europe would like to draw the Council's specific attention to the following items currently debated at EU Institution's level:

No ban of SF6

Proposals have been put forward in the European Parliament to prohibit the use of SF6 in medium-voltage secondary switchgear. This is not in line with current market realities. Any potential alternatives to SF6 would, among other effects, jeopardize electrical system reliability and safety. Moreover, the cost of a ban would outweigh the economic and environmental benefits as confirmed in the European Commission's Impact Assessment (please refer to the Öko-Recherche study). Therefore, we urge the Council to oppose these proposals.

Training and Certification for persons dealing with SF6

Current EU legislation requires that persons executing recovery of SF6 in the EU are trained and certified. T&D Europe member companies are fully compliant with these requests. The new proposal by the EU Commission now asks to expand these requirements also to those persons who install, service, maintain, repair or decommission electrical switchgear that contains SF6; even if these persons will not be in contact with the gas. We believe that this is an excessive demand, which constitutes a new financial burden but will not achieve the goal of reducing the emission risk. In this context, we also want to point out that the EU Commission's Impact Assessment shows that in some Member States and sectors only 50% of the personnel dealing with F-gases was certified and trained as demanded by the legislation. We therefore urge the Council to give priority to ensuring the full implementation of the existing legislation before adding further requirements.

In conclusion, T&D Europe would like to stress that it follows the discussion on the F-gases regulation closely from an industry point of view and remains at the disposal of the Council for any questions or clarifications needed.