

From: [REDACTED] (CLIMA)
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Recast of EU F-gas Regulation: PFAS alternatives to SF6
Date: mercredi 24 mars 2021 18:58:00
Attachments: [image002.gif](#)
[image003.gif](#)

Dear [REDACTED]

Thank you for mail. I can inform you that we are in contact with our colleagues in DG Environment working on the Chemicals Strategy for Sustainability Towards a Toxic-Free Environment, in order to ensure that our policies will remain consistent. While both the F-gas Review and the work on PFAS are work in progress, at this stage we do not have reasons to believe that it would impact on the conclusions of what could be "*cost-effective, technically feasible, energy-efficient and reliable*" alternatives to SF6 in switchgear.

Best regards

[REDACTED]
[REDACTED] t



European Commission
Directorate-General for Climate Action

[REDACTED]

[REDACTED]
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DISCLAIMER

"The views expressed are purely those of the writer and may not in any circumstances be regarded as stating an official position of the European Commission."

From: [REDACTED]@siemens.com>

Sent: Wednesday, March 24, 2021 10:19 AM

To: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
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>

Subject: Recast of EU F-gas Regulation: PFAS alternatives to SF6

Dear [REDACTED],

Out of scope

Out of scope

Siemens AG frequently puts its particular challenging portfolio strategy on test, making MV switchgear products market available that completely avoid F-gases or other fluorinated substances as SF6 replacement.

During this process we came across the Communication "Chemicals Strategy for Sustainability Towards a Toxic-Free Environment" of the European Commission, Parliament, Council, Economic and Social Committee and the Committee of the Regions, dated Oct. 10, 2020 (COM(2020) 667 final). It addresses per- and polyfluoroalkyl substances (PFAS).

It is said that those substances "... require special attention ..." and it is aimed "... in particular, that the use of PFAS is phased out in the EU ...".

Note: PFAS substances are listed in the Global Database of PFASs of the OECD portal (<http://www.oecd.org/chemicalsafety/portal-perfluorinated-chemicals/>)

We now wonder how this Communication might affect the acceptance criteria for electrical equipment with SF6 alternatives stated in the existing EU Gas Regulation's ((EC) No 842/2006) article 21, namely being "*cost-effective, technically feasible, energy-efficient and reliable*".

Does the European Commission think about complementing the above acceptance criteria beyond a pure CO2 equivalent view towards a more comprehensive ecological footprint view?

To allow stability of planning, the mentioned Communication on chemicals should be considered in the upcoming recast of the F-gas Regulation. We therefore would welcome a guidance from the EU Commission towards the industry players which helps to understand the mid- to long term use of PFAS alternatives to SF6 in (MV) switchgear.

With best regards,

Siemens AG

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