Eurelectric's position on the F-gas regulation revision - based on the Cross-industrial coalition's opinion

The energy industries have debated and thought together about solutions for a pragmatic phasing-out of F-gases. Whereas our industries are mobilised for the fast and neat phase-out of SF_6, it appears that the grid stability and safety require much attention. Indeed, to be able to deploy the hundreds of gigawatts of heat-pumps, RES and EV charging points, switchgears can simply not be replaced nor switched off from one day to another.

The Commission, the Parliament and the Council have all proposed some ideas taking into account some of the realities that the European industries face. Below, you will find the "4 column" document that synthesizes the recommendations making the F-gas regulation practicable.

In green : proposals to retain
In red : proposals to dismiss
In yellow : proposals to improve

	Commission Link to text	**Parliament**	**Council**	**Coalition Position**
Art 2.2	This Regulation also applies to products and equipment***, and parts thereof***, containing fluorinated greenhouse gases or whose functioning relies ***upon*** those gases.	This Regulation also applies to products and equipment, containing fluorinated greenhouse gases or whose functioning relies ***partly or entirely on*** those gases.	This Regulation also applies to products and equipment, ~~and parts thereof~~, containing fluorinated greenhouse gases or whose functioning relies upon those gases.	The coalition supports the Council's amendment Spare parts and servicing must be excluded from the scope of the ban. Spare parts are indeed essential to the safety of our installations which need to be maintained and repaired quickly to guaranty the security of electricity supply. A ban of spare parts would be tantamount to imposing a massive and premature replacement of all the EU's SF6 electrical equipment: the entire European fleet of SF6- equipment built over the last 40 years would have then to be rebuilt in the 10-15 forthcoming years, which would be impracticable in terms of alternative equipment production capacity as well as consignments/outage, and would represent a disproportionate cost (large quantities of stranded assets). It would endanger the supply of

				electricity in Europe and would clearly contradict the EU circular economy principle and its objectives of durability and reparability of products, with then a negative effect on decarbonation efforts.
Art 5.1	… Electrical switchgear shall not be checked for leaks provided it complies with one of the following conditions: (a) it has a tested leakage rate of less than 0,1 % per year as set out in the technical specification of the manufacturer and is labelled accordingly; (b) it is equipped with a pressure or density monitoring device; (c) it contains less than 6 kilograms of fluorinated greenhouse gases listed in Annex I." …	… Electrical switchgear shall not be checked for leaks provided it complies with one of the following conditions: (a) it has a tested leakage rate of less than 0,1 % per year as set out in the technical specification of the manufacturer and is labelled accordingly; (b) it is equipped with a pressure or density monitoring device; ***Deleted*** …	… Electrical switchgear shall not be checked for leaks provided it complies with one of the following conditions: (a) it has a tested leakage rate of less than 0,1 % per year as set out in the technical specification of the manufacturer and is labelled accordingly; (b) it is equipped with a pressure or density monitoring device **with an automatic alert system**; (c) it contains less than 6 kilograms of fluorinated greenhouse gases listed in Annex I.	• **Point b)** <u>The coalition supports the EC's proposal</u> Imposing annual leakage measurements for small (< 6kg f-gas) electrical switchgear and circuit breakers will require dismantling and testing millions of pieces of critical electrical infrastructure. This will render much of Europe's MV connected electricity generation and distribution equipment idle and will very likely cause F-gas and other emissions to rise due to leakage when dismantling the equipment and the associated logistics (shipments to test labs). The reason why the 6kg exemption has been inserted initially in the F-Gas legislation is because it is not feasible to measure the very small amounts of leakage on such switchgear. <u>Regarding the Council's proposal, the coalition is not in favour of the amendment on point b).</u> Indeed, most electrical installations over the territory are equipped with a pressure or density monitoring device that are in conformity with art. 6.2's requirements. Leaks for this type of equipment are currently well detected with the existing monitoring practices. Any new features regarding the leakage measuring devices should only apply for new equipment. • **Point c)** <u>The Coalition supports the EC's and the Council's proposal</u>

				The reason why the 6kg exemption (point c) has been in the F-Gas legislation since the beginning is because it is not feasible -and it is counterproductive- for very small amounts of leakage to be measured on such switchgears.
Art 6.2	Operators othis type of equipmentn Article 5(2), points (f) and (g), and containing fluorinated greenhouse gases listed in Annex I in quantities of 500 tonnes of CO_2 equivalent or more and installed from 1 January 2017, shall ensure that equipment is provided with a leakage detection system which alerts the operator or a service company of any leakage.	Operators of the equipment listed in Article 5(2), points (f) and (g), and containing fluorinated greenhouse gases listed in Annex I in quantities of 500 tonnes of CO_2 equivalent or more and installed from 1 January 2017, shall ensure that equipment is provided with a leakage detection system which alerts the operator or a service company of any leakage. ***For the purposes of Article 5(2), point (g), the leakage detection system shall have a higher sensitivity than a pressure- or density-monitoring device.***	Operators of the equipment listed in Article 5(2), points (f**e**) and (g**f**), and containing fluorinated greenhouse gases listed in Annex I in quantities of 500 tonnes of CO2 equivalent or more and installed from 1 January 2017, shall ensure that equipment is provided with a leakage detection system which alerts the operator or a service company of any leakage.	<u>The coalition supports the EC's version and the Council's amendment</u> Current leak detection systems automatically indicate their malfunction and have an extremely low failure rate (5 per year/10000).

Art.11.1	1. The placing on the market of products and equipment, including parts thereof, listed in Annex IV, with an exemption for military equipment, shall be prohibited from the date specified in that Annex, differentiating, where applicable, according to the type or global warming potential of the gas contained." …	1. The placing on the market of products and equipment, including parts thereof, listed in Annex IV, with an exemption for military equipment, shall be prohibited from the date specified in that Annex, differentiating, where applicable, according to the type or global warming potential of the gas contained. **By way of derogation from the first subparagraph, the placing on the market of parts of equipment required for repairs and servicing of existing equipment shall be allowed provided that the repair or servicing does not result in an increase in the capacity of the equipment or an increase in the amount of fluorinated gases contained in the equipment or of the fluorinated gases used.**	The placing on the market of products and equipment, including parts thereof, listed in Annex IV, with an exemption for military equipment, shall be prohibited from the date specified in that Annex, differentiating, where applicable, according to the type or global warming potential of the gas contained. **The placing on the market of parts of products and equipment required for repair and servicing of existing equipment listed in Annex IV is allowed provided that the repair or servicing does not result in an increase of the capacity of the product or equipment, an increase of the amount of fluorinated greenhouse gas contained in the product or equipment, and there is no change of the type of fluorinated greenhouse gas used that leads to an increase of the global warming potential of the fluorinated greenhouse gas used.**	Eurelectric supports the EP's and the Council's amendments, adding the following paragraph on extension conditions to mirror recital 13a) ***"Where the extension of existing electrical equipment is necessary, one or more additional cells with fluorinated greenhouses gases with the same GWP as the existing cells, may be added if a technology using fluorinated greenhouses gases with a lower GWP would entail the replacement of the entire electrical equipment, be technically impossible, or trigger disproportionate costs."*** Phasing out existing equipment will be counterproductive and go against circular economy principles. Manufacturing and installing new equipment require significant amounts of energy, resources, and emissions. It will also create a security of supply issue and bottleneck the rollout of renewable energy sources, **endangering the stability and reliability grid**. **If the grid fails, no electrification is possible.** By continuing to use and adapt existing equipment, the European industry can ensure a stable energy supply while gradually transitioning towards newer, more efficient technologies.

Art 11.4	Following a substantiated request by a competent authority of a Member State and taking into account the objectives of this Regulation, the Commission may, exceptionally, by means of implementing acts, authorise an exemption for up to four years to allow the placing on the market of products and equipment listed in Annex IV, ***including parts thereof,*** containing fluorinated greenhouse gases or whose functioning relies upon those gases, where it is demonstrated that:	***Without prejudice to the derogation for spare parts referred to in subparagraph 1a,*** following a substantiated request by a competent authority of a Member State and taking into account the objectives of this Regulation, the Commission may, exceptionally, by means of implementing acts, authorise an exemption for up to four years to allow the placing on the market of products and equipment listed in Annex IV, containing fluorinated greenhouse gases or whose functioning relies upon those gases, where it is demonstrated that:	Following a substantiated request by a competent authority of a Member State and taking into account the objectives of this Regulation, the Commission may, exceptionally, by means of implementing acts, authorise an exemption for up to four years to allow the placing on the market of products and equipment listed in Annex IV, **or, in derogation to Article 13(5), putting into operation new or expanded electrical switchgear,** including parts thereof, containing fluorinated greenhouse gases or whose functioning relies upon those gases, where it is demonstrated that: (a) for a specific product or a piece of equipment, or for a specific category of products or equipment, alternatives are not available, or cannot be used for technical or safety reasons; or (b) the use of technically feasible and safe alternatives would entail disproportionate costs. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 34(2).	<u>The coalition supports the Council's amendment under the condition to replace the reference to "putting into operation" by "placing on the market'</u> Electrical switchgears are critical for the reliability of the power network, and for the integration of new assets such as heat pumps, RES and EV charging points. Therefore, **the expansion of electricity networks is crucial for the EU's electrification**. Spare parts should be out of the scope of the ban. Additionally, "Placing on the market" must be used rather than "Putting into operation" - it is consistently used 34 times in the document, but then it switches sometimes to "putting into operation" which is used 3 times only. "Placing on the market" is also clearly defined in definitions while "putting into operation" is not. Also "Putting into operation" can disrupt work in progress and trigger important electrification delays where equipment is in utility stock but is not in operation yet because of external reasons / force majeure, etc. For instance, if a windfarm HV Station is built with a delay in the utility connection e.g. due to permits, then the HV Substation would need to have switchgear replaced because it was rightfully placed on the market but not timely put into operation.

Art 13.3a			**From 1 January 2035, the use of fluorinated greenhouse gases listed in Annex I, Section 3 for the servicing or maintenance of electrical switchgear equipment shall be prohibited unless it is reclaimed or recycled, except if it is proved that reclaimed or recycled fluorinated greenhouse gases listed in Annex I, Section 3:** **(i) cannot be used on the basis of technical grounds; or** **(ii) are not available in case of an emergency repair situation.** **In such a cases, the user shall provide evidence, upon request, on the justification for use to the competent authority of the Member State and the Commission.** **This paragraph shall not apply to military equipment.**	<u>The coalition supports the Council's amendment</u> Our industry is committed to phasing out f-gases where it does not endanger the grid's reliability. Security of supply and availability of the grid are paramount to guarantee the deployment of heat pumps, EV charging points and RES. Users already favour the use of recycled SF6 (circular economy), but it is too early to make it mandatory because of technical / technological limits. For instance, in some limited cases, users still need virgin SF6, such as in cable ends. Also, it takes time for stocks of recycled SF6 to build up and for storage channels to be organised.
Annex IV point 23	"Installation and replacement of the following electrical switchgear"	"Installation and replacement of the following electrical switchgear"		<u>The Coalition is against the use of reference to the installation and replacement when it comes to ban dates</u> Ban dates must refer to **Placing on the market** instead of ~~**Installation and replacement**~~. As the planning, building, and engineering processes even in the switchgear installation projects can take up to many months or even years, the decisive data with regard to ban should be the placing on the market date. The notion of

				"putting into operation" or "installation and replacement" could lead to nearly finished projects that cannot be put into operation because of minor, unforeseeable delays occurring (e.g. delays in the delivery of other technical parts, force majeure as floods or other occurrences, etc.)
Annex IV point 23 / Art. 13.5 (Council)	Annex IV (23) Installation and replacement of the following electrical switchgear: (a) medium voltage switchgear for primary and secondary distribution up to 24 kV, with insulating or breaking medium using, or whose functioning relies upon, gases with GWP of 10 or more, or with GWP of 2000 or more, unless evidence is provided that no suitable alternative is available based on technical grounds within the lower GWP ranges referred to above; – Date of prohibition: 1 January 2026 (b) medium voltage switchgear for primary and secondary distribution from more than 24 kV and up to 52 kV, with insulating or breaking medium using, or whose functioning relies upon gases with GWP of 10 or more, or with GWP of	Annex IV (23) Installation and replacement of the following electrical switchgear: (a) medium voltage switchgear for primary and secondary distribution up to ***and including*** 24 kV, with insulating or breaking medium using, or whose functioning relies upon, ***fluorinated greenhouse*** gases; - 1 January 2026 (b) medium voltage switchgear for primary and secondary distribution from more than 24 kV and up to ***and including*** 52 kV, with insulating or breaking medium using, or whose functioning relies upon ***fluorinated greenhouse*** gases; 1 January ***2028*** (c) high voltage switchgear from 52 and up to ***and including*** 145 kV and up to 50 kA short circuit current with insulating or breaking	**Art. 13.5 Putting into operation of the following new or expanded electrical switchgear with fluorinated greenhouse gases is prohibited as follows:** **(a) as of 1 January 2026 medium voltage switchgear for primary and secondary distribution up to 24 kV, with insulating or breaking medium with GWP of 10 or more;** **(b) as of 1 January 2030 medium voltage switchgear for primary and secondary distribution from more than 24 kV and up to 52 kV, with insulating or breaking medium with GWP of 10 or more;** **(c) as of 1 January 2028 high voltage switchgear from 52 and up to 145 kV and up to 50**	The coalition **partly** supports the Council's amendment for voltage levels up to 145kV: • To bring clarity and consistency for industrial stakeholders, a single GWP < 10 threshold should be maintained for voltage levels below 24kV. For the 12-24 kV category, ban date 2028 is recommended to allow manufacturers develop sufficient offers • "Expansion" should not be included in this article as the purposes of expansion are to achieve the most electrification with the least environmental impact. Extension / expansion is treated in art. 13.6 For voltage levels above 145kV, the coalition proposes the following provision : ***(d) high voltage switchgear of more than 145 kV or more than 50 kA short circuit current with insulating or breaking medium using, or whose functioning relies upon gases with GWP of 1000 unless evidence is provided that no suitable alternative is available based on technical grounds – Date of prohibition: 1 January 2031***

	more than 2000, unless evidence is provided that no suitable alternative is available based on technical grounds within the lower GWP ranges referred to above; – Date of prohibition: 1 January 2030 (c) high voltage switchgear from 52 and up to 145 kV and up to 50 kA short circuit current with insulating or breaking medium using, or whose functioning relies upon gases with GWP of 10 or more, or with GWP of more than 2000, unless evidence is provided that no suitable alternative is available based on technical grounds within the lower GWP ranges referred to above; – Date of prohibition: 1 January 2028 (d) high voltage switchgear of more than 145 kV or more than 50 kA short circuit current with insulating or breaking medium using, or whose functioning relies upon gases with GWP of 10 or more, or with GWP of more than 2000 unless evidence is provided that no suitable alternative is available based on technical grounds within the lower GWP ranges referred to above. – Date of prohibition: 1 January 2031	medium using, or whose functioning relies upon ***fluorinated greenhouse gases,*** unless evidence is provided that no suitable alternative is available***, in which case gases with GWP of up to 1000 can be used;*** - 1 January 2028 (d) high voltage switchgear of more than 145 kV or more than 50 kA short circuit current with insulating or breaking medium using, or whose functioning relies upon ***fluorinated greenhouse*** gases, unless evidence is provided that no suitable alternative is available, ***in which case gases with GWP of up to 1000 can be used***. **–** 1 January 2031	**kA short circuit current with insulating or breaking medium with GWP of 10 or more;** **(d) as of 1 January 2032 high voltage switchgear of more than 145 kV or more than 50 kA short circuit current with insulating or breaking medium with GWP of 10 or more.**	*Justification* *For equipment above 145 kV, technologies with a GWP<10 have not reached maturity yet and will probably not do so before 2035. This will delay the decarbonation of the EU by at least 10 years. Globally, such a drastic reduction in the number of alternative technologies is not desirable at the beginning of an innovation cycle, since a technology might fail.* *As stated in the Coalition's joint letter on the F-Gas Regulation, signed by more than 60 stakeholders (including major energy sector associations at EU and national levels), the coalition recommends setting a unique GWP threshold of 1000 for HV equipment to drastically reduce their global carbon footprint over the next 10 years, during which a lot of HV electrical equipment will be installed to deliver the energy transition.* *This specific high voltage threshold may be reviewed in a next revision, should it be proved that alternative with a GPW<10 are available and more favorable in term of global carbon footprint.* *As for the impact of alternative f-gas technologies on health and the environment, this will be examined in detail in the context of the restrictive regulation on PFAS proposed on 7 February by 5 Member States. This impact should not be pre-empted in the F-Gas Regulation which is not the appropriate legislative vehicle, its objective being the reduction of CO2 emissions.* Additionally and generally, any reference to "putting into operation" must be replaced with "placing on the market" for consistency in legal terminology, for legal certainty and for avoidance of market disruption.

Annex IV paragraph 2 (EP) / Art 13.5aa (Council)		The ***exception*** referred to in point 23***(c) and (d) may be authorised by the competent authority of a Member State following a substantiated request by an operator. The operator's request*** shall include documentation ***providing*** that following an open call for tender ***with a deadline for bids after the dates referred to in point 23*** no suitable alternative on technical grounds, given the demonstrated specificities of the application, ***are*** available that could meet the conditions set out in point 23***(c) and (d), or, until two*** years ***after the dates referred to in point 23(c) and (d), only one bid was placed for such switchgear with insulating or breaking medium not using, or whose functioning does not rely upon fluorinated greenhouse gases.*** The competent authority ***shall make the documentation available*** to the Commission, upon request.	**By derogation to paragraph 5, switchgear with insulating or breaking medium with GWP lower than 2000 are allowed if, following an open call for tender, given the needs and the specificities of the equipment required for the specific use concerned:** **(i) during the two years after the respective dates under paragraph 5, points (a) to (d), only one or no bidder submitted a tender for switchgear with insulating or breaking medium with a GWP of less than 10; or** **(ii) after the two-year period mentioned under (i) above, no bidder submitted a tender for switchgear with insulating or breaking medium with a GWP of less than 10.**	The coalition does not support the Council's nor the EP's amendments in their current form. Eurelectric proposes the following provision: ***"By derogation to paragraph 5, switchgear with insulating or breaking medium with GWP lower than 2000 are allowed if, following an open call for tender, given the needs and the specificities of the equipment required for the specific use concerned:*** ***~~during the two years after the respective dates under paragraph 5, points (a) to (d),~~ only one or no independent bidder submitted a suitable and tested solution during the tender for switchgear with insulating or breaking medium with a GWP of less than 10"*** *Justification* *The market needs to have indeed at least 2 independent (financially and technically) manufacturers responding to a call for tender to guarantee the supply of electricity at the best cost for the consumer. This diversity of suppliers is also necessary in order not to be subject to supply uncertainties (in the event of insufficient supplier capacity) which would pose a risk to the security of electricity supply for European consumers (industrial and private) and to the grid expansion which is urgently needed to integrate renewable energy resources. This is an important*

				political issue in the context of the current energy crisis. *There is no justification for limiting this clause in time. This clause should apply to all voltage levels.*
Annex IV – paragraph 2 (EP)/Art 13.5ab (Council)		**"**unless evidence is provided that no suitable alternative is available, ***in which case gases with GWP of up to 1000 can be used"***	**By derogation to paragraph 5aa, switchgear with insulating or breaking medium with a GWP of 2000 or more is allowed if, following an open call for tender, given the needs and the specificities of the equipment required for the specific use concerned, no bidder submitted a tender for switchgear with insulating or breaking medium with a GWP of less than 2000.**	The Coalition supports the Council's insertion *Justification:* *To ensure that electrification and renewable connections are not delayed in the eventuality of some categories of suitable switchgear being unavailable, this clause provides a way of ensuring that such connections can continue taking place.*
Annex IV – paragraph 2 (EP)/Art 13.5ac (Council)	The ***evidence*** referred to in point 23***,*** shall include documentation ***establishing*** that following an open call for tender no suitable alternative on technical grounds, given the demonstrated specificities of the application, ***was*** available that could meet the conditions set out in point 23***. The documentation shall be kept by the operator for at least five*** years ***and shall be made available to*** the competent authority ***of the Member State and*** to the Commission, upon request.	The ***exception*** referred to in point 23***(c) and (d) may be authorised by the competent authority of a Member State following a substantiated request by an operator. The operator's request*** shall include documentation ***providing*** that following an open call for tender ***with a deadline for bids after the dates referred to in point 23*** no suitable alternative on technical grounds, given the demonstrated specificities of the application, ***are*** available that could meet the conditions set out in point 23***(c) and (d), or, until two*** years ***after the dates referred to in point 23(c) and (d), only one bid was placed for such***	**The documentation establishing the evidence for the derogations listed in paragraphs 5aa and 5ab shall be kept by the operator for at least five years after the respective dates specified under paragraph 5 and shall be made available to the competent authority of the Member State and to the Commission, upon request.**	The coalition supports the EC's version and the Council's amendment A tendering procedure with documentation keeping rules are securing the procedure. Adding a burdensome preliminary authorisation procedure will only slow down the deployment of projects because of numerous administrative steps.

		switchgear with insulating or breaking medium not using, or whose functioning does not rely upon fluorinated greenhouse gases. The competent authority ***shall make the documentation available*** to the Commission, upon request.		
Art. 13.5ad			**Paragraph 5 shall not apply to equipment for which it has been established in ecodesign requirements adopted under Directive 2009/125/EC that, due to higher energy efficiency during operation, its life cycle CO2 emissions would be lower than those of equivalent equipment which meets the relevant ecodesign requirements.**	The coalition supports the Council's insertion with a suggested improvement: ***5d) Paragraph 5 shall not apply to equipment for which it has been established in ecodesign requirements adopted under Directive 2009/125/EC that, ~~due to higher energy efficiency during operation,~~ its life cycle CO2 emissions would be lower than those of equivalent equipment which meets the relevant ~~ecodesign~~ requirements set in Article 13.5 a) b) c) d). By 31 December 2024, the Commission shall set ecodesign requirements for equipment covered by paragraph 5.*** *Justification* *The coalition fully supports the idea of a lifecycle emissions' consideration. However, energy efficiency during operation is not a relevant criterion for switchgears, which are inert equipment. For a comprehensive measurement of the emissions and of the environmental impact, one must either adopt a life cycle approach, or set global ecodesign requirements.*

Art13.6			**The placing on the market of parts of equipment required for repair, expansion and servicing of existing electrical switchgear is allowed provided there is no change of the type of fluorinated greenhouse gas used that leads to an increase of the global warming potential of the fluorinated greenhouse gas used.**	The coalition supports the Council's amendment
Recital 12	The existing prohibitions on specific uses of sulphur hexafluoride, the most climate damaging substance known, should be retained and be complemented by additional restrictions on the use in the critical sector of power distribution.	The existing prohibitions on specific uses of sulphur hexafluoride, the most climate damaging substance known, should be retained and be complemented by additional restrictions on the use in the critical sector of power distribution. ***This Regulation does not require the replacement of switchgears that are already installed in the power grid on the dates indicated in Annex IV. Grid operators should only be required to install new switchgears fulfilling the requirements set out in that Annex when, as from the dates indicated therein, they decide to replace already installed switchgears or to install additional switchgears in the power grid.***	The existing prohibitions on specific uses of sulphur hexafluoride, the most climate damaging substance known, should be retained and be complemented by additional restrictions on the use in the critical sector of power distribution.	The coalition supports the EP's amendment Phasing out existing equipment will be counterproductive and go against circular economy principles. Manufacturing and installing new equipment require significant amounts of energy, resources, and emissions. It will also create a security of supply issue and bottleneck the rollout of renewable energy sources, **endangering the stability and reliability grid**. **If the grid fails, no electrification is possible.** By continuing to use existing equipment, the European industry can ensure a stable energy supply while gradually transitioning towards newer, more efficient technologies.
Recital 13a		***The ban on the placing on the market of parts of equipment that is banned under this Regulation should not apply to parts required for repairs and servicing of existing equipment that has already been installed in order to ensure that such equipment remains repairable and***	**(…) Where technically suitable alternatives are available and in consistency with the EU competition policies, bans should be introduced on the putting into operation of new electrical switchgear with relevant fluorinated greenhouse gases. Where the extension of existing**	The coalition partly supports the EP's and the Council's amendments. Eurelectric suggests the following wording (EP + Council combination): ***"The ban on the placing on the market of parts of equipment that is banned under this Regulation should not apply to parts required for repairs and servicing of existing equipment***

		maintainable for their full lifespan, thereby avoiding the need for the unwarranted replacement of existing energy equipment and infrastructure, which could have a negative effect on decarbonisation efforts. The repair or servicing for which such spare parts are used should not result in an increase in the capacity of the equipment or an increase in the amount of fluorinated gases contained in the equipment or of the fluorinated gases used.	**electrical equipment is necessary, one or more additional cells with fluorinated greenhouses gases with the same GWP as the existing cells, may be added if a technology using fluorinated greenhouses gases with a lower GWP would entail the replacement of the entire electrical equipment.**	***that has already been installed in order to ensure that such equipment remains repairable and maintainable for their full lifespan, thereby avoiding the need for the unwarranted replacement of existing energy equipment and infrastructure, which could have a negative effect on decarbonisation efforts.*** ***Where the extension of existing electrical equipment is necessary, one or more additional cells with fluorinated greenhouses gases with the same GWP as the existing cells, may be added if a technology using fluorinated greenhouses gases with a lower GWP would entail the replacement of the entire electrical equipment or disproportionate costs."*** *Justification* *The expansion of existing Gas-insulated switchgear (e.g. addition of new circuit breaker cells) must remain allowed during the entire lifespan of switchgears to cope with increasing electricity flows due to the EU's crucial electrification targets. Rebuilding substations before the end of their lifespan would generate significant environmental and financial costs, whereas extensions are the least resource-intensive and least polluting operation when looking for grid capacity / additional assets connection (heat pumps, EV charging points, RES).* *Additionally, the coalition emphasizes that any reference to 'putting into operation' (not defined, not consistent with the rest of the text, and causes legal uncertainty) should be replaced by 'placing on the market' (usual wording, defined). As regards* ***the Placing on the market, the***

				decisive date should be the contract signing date for equipment manufacturing and delivery.
Recital 13b			**In order to limit the necessity for the production of virgin SF6, the capacity of reclamation for SF6 from existing equipment should be increased. Without endangering the safe functioning of the electrical grids and power plants, the use of virgin SF6 in electrical switchgear should be avoided, where it is technically feasible and when reclaimed or recycled SF6 is available.**	The coalition supports the Council's amendment Users already favour the use of recycled SF6 (circular economy), but it is too early to make it mandatory because of technical / technological limits. For instance, in some limited cases, users still need virgin SF6, such as in cable ends. Also, it takes time for stocks of recycled SF6 to build up and for storage channels to be organised.