

## Consultation response

AmCham EU consultation response addressing the  
briefing paper:

‘SF6 and alternatives in electrical switchgear  
and related equipment’ from Ökorecherche

April 2020

AmCham EU speaks for American companies committed to Europe on trade, investment and competitiveness issues. It aims to ensure a growth-orientated business and investment climate in Europe. AmCham EU facilitates the resolution of transatlantic issues that impact business and plays a role in creating better understanding of EU and US positions on business matters. Aggregate US investment in Europe totalled more than €3 trillion in 2019, directly supports more than 4.8 million jobs in Europe, and generates billions of euros annually in income, trade and research and development.

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AmCham EU welcomes the March 2020 briefing paper 'SF6 and alternatives in electrical switchgear and related equipment' from Ökorecherche.

As shared, the current briefing report does not include recommendations towards further developing EU policies as was requested by the European Commission in its service contract. Therefore, we urge the European Commission to demand that the final report includes concrete regulatory proposals defining timings for the phase-down of equipment using SF6 by voltage range. Furthermore, we also believe that the report should cover the complete voltage range as well as related equipment, as requested by the European Commission in its service contract (the interim briefing is mainly focussing on medium voltage equipment).

We would also ask the European Commission to legislate the phase-down of SF6 in all electrical operating equipment where workable and where more environmentally sustainable alternatives are commercially viable via changes to the Annex III through a delegated act procedure. We believe this could be a practical way to achieve the EU Green Deal and EU climate ambitions.

Finally, we believe that technical aspects in the report would need modifications. AmCham EU would defer comment to the OEM associations for their input.

AmCham EU members are working to minimise the environmental impact of processes and products. We support the existing F-gas regulation and policies that encourage the development and deployment of products using alternatives with lower global warming potential (GWP). In many cases alternatives have or are being developed, but the technical situation varies greatly across applications, product sectors and climate zones within the EU. We support a policy framework that is cost-effective and proportionate, by fully taking this sectoral variation into account, while preserving a Single Market for F-gases and products containing them in the EU.