

# **EWIA response to the public consultation on the Draft BEREC Work Programme 2026**

**November 2025**

*European Wireless Infrastructure Association – EWIA*

EWIA – the European Wireless Infrastructure Association – welcomes the opportunity to share its views on the Draft BEREC Work Programme 2026. EWIA is the European trade association of neutral host Towercos which provide open access to their shared wireless infrastructure through a neutral host model. This ‘neutral host’ model is now the prevalent model in Europe, where our 11 members operate 251,000 wireless infrastructure assets in 20 countries. We serve all mobile network operators (MNOs) and hundreds of other wireless operators enabling better communications for end users in the communities we cover.

## **BEREC planned work in relation to the promotion of full connectivity across Europe**

EWIA members are committed to enabling better and smarter connectivity across Europe through the investment in and the delivery of worldclass neutral-hosting wireless infrastructure and associated facilities. This results in several benefits supporting the EU’s Digital Decade ambitions.<sup>1</sup> First, to date neutral host TowerCos have released €53b of capital to MNOs to help improve coverage and 5G roll-out. Second, being operationally more efficient and sharing-driven neutral host TowerCos are on track to deliver a predicted €31b in economic savings (2019–29). Third, the neutral-host TowerCo sector enables downstream competition among active networks and among retail service providers by decreasing the barriers to entry and by lowering operating costs through sharing and efficient management. Lastly, the functioning and competitive nature of the neutral host TowerCo sector ultimately benefits consumers and technology-enabled businesses through both price benefits and a high level of service quality.

In line with BEREC’s strategic focus areas and the broader EU digital agenda, EWIA believes that the role of Towercos which provide open access to their shared wireless infrastructure through a neutral host model will be critical to meeting Europe’s 2030 targets.

We recognise the importance of BEREC’s work in promoting full connectivity across Europe to the benefits of businesses, administration and citizens, and have identified the following upcoming activities as being of particular relevance for our members:

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<sup>1</sup> EY-Parthenon study “How neutral host TowerCos strengthen Europe’s wireless connectivity and competitiveness” (June 2025): <https://ewia.org/resources/reports/>.

- Fact finding report on the competition indicators and regulatory highlights in different jurisdictions (point 1.2 of the Draft BEREC Work Programme 2026)
- BEREC Report on the application of fair and reasonable pricing within the SMP framework (point 1.6 of the Draft BEREC Work Programme 2026)
- BEREC contribution to European Commission Guidelines on Access to existing physical infrastructure according to Art. 3 (13) of the Gigabit Infrastructure Act (point 1.8 of the Draft BEREC Work Programme 2026)

On the latter, please find attached our contribution to the related public consultation launched by the European Commission. We remain at BEREC disposal for any additional information or questions you may have on this contribution and are available to contribute to your work related to the above points.

### **BEREC planned work in relation to environmentally sustainable, secure and resilient digital infrastructures**

The open, neutral and sharing-driven TowerCo model brings significant environmental benefits, as it will result in 109,000 fewer towers being built by 2030 and thereby avoid almost 4 million tons of CO2 emissions, which is the equivalent of taking almost 200,000 cars off the road each year.<sup>2</sup>

When it comes to the environment related strategic priority of the Draft BEREC Work Programme 2026, EWIA is particularly interested in and willing to engage on the following points:

- Advancing towards environmental data collection on ECN/ECS and contributing to a future Code of Conduct on ECN/ECS sustainability (point 4.1 of the Draft BEREC Work Programme 2026)
- Understanding digital technologies sufficiency for greener networks and ICTs (point 4.3 of the Draft BEREC Work Programme 2026)
- Ad hoc work on reinforcing the EU's resilience capabilities (point 4.5 of the Draft BEREC Work Programme 2026)
- For 2027 and beyond, exchange of best practices on environmental impact assessment of mobile network sharing and supporting mobile network sharing indicators (point 8.4 of the Draft BEREC Work Programme 2026)

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<sup>2</sup> EY-Parthenon study "The sustainability contribution of the European independent TowerCos sector" (March 2023): <https://ewia.org/resources/reports/>

EWIA remains at BEREC's disposal to contribute to its work in 2026 and beyond and share the experience of our members, especially concerning the workstreams identified in this paper, but also anywhere else BEREC would deem useful.