

Public Consultation on the BEREC Draft Report on Sustainability: Assessing BEREC's contribution to limiting the impact of the digital sector on the environment

Fields marked with * are mandatory.



During its 50th plenary meeting (10 March 2022), the BEREC Board of Regulators has approved the Draft BEREC Report on Sustainability: Assessing BEREC's contribution to limiting the impact of the digital sector on the environment for public consultation.

This Draft Report on Sustainability provides an overview of the results of BEREC's groundwork on ICT sustainability to assess and better understand the impact of the digital sector, including electronic communications networks and services, on the environment. It sets out an outline of BEREC's approach to environmental sustainability of the sector.

This Draft report constitutes the first step: BEREC will continue to build up its knowledge on the important topic of sustainability to be able to contribute with its expertise in shaping the green and digital twin transition. Collaboration with relevant stakeholders will be of importance in this process, notably to share analysis and experiences related to ICT sustainability.

For structured responses to this consultation, BEREC kindly asks you to submit your comments/remarks per each chapter of the draft report in the following questions below. You will have also the opportunity to upload a supporting document at the end of the survey (file size limit: 1 MB).

Responses should not be submitted later than **14 April 2022 (17:00 CET)**.

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Feedback on each chapter of the Draft Report

1) Please enter your comments on Chapter 1 (Introduction) here:

OVHcloud supports the purpose of BEREC's Draft Report, the various sources used for this Report as well as having taking in consideration the important role of the Energy Efficiency Directive recast. OVHcloud shares BEREC's analysis ("ICT sector itself, just as any sector, should be aware of its own environmental footprint and should aim to limit it") and welcomes BEREC's aim to develop an understanding of how regulatory actions of NRAs can influence the environmental footprint and encourage the sector to move forward.

2) Please enter your comments on Chapter 2 (Case studies) here:

NA

3) Please enter your comments on Chapter 3 (Outcomes on BEREC's previous work on sustainability) here:

- OVHcloud supports some of the key findings within the previous work on sustainability, including the role that the ICT sector has in reducing overall energy consumption due to technological advancements. We want to note that data centres and cloud services have a specific role to play in this field, enabling energy efficiency of data stored and processed.
- We agree that there are several gaps when it comes to identified and accepted indicators for the ICT industry and we support the ongoing work of the EU Institutions in advancing on this point.
- However, it will be important that all ongoing research and regulatory developments (ecodesign study, BEREC's recommendations, Digital Europe's study and the provisions of the Energy Efficiency Directive Recast) are in close synergy as to avoid confusion in the future.
- Finally, OVHcloud has for a long time argued that energy is only one aspect of the sustainability of a data center. Any indicators must go beyond that to also include circular economy and biodiversity among others. Having a vertical integrated industrial model, OVHcloud is a pioneer among the industry, ensuring that all electronic equipment that we use are as repairable as possible to not only ensure energy-efficient services, but also resource efficient.

4) Please enter your comments on Chapter 4 (Inputs from stakeholders) here:

- OVHcloud is Member of European Commission's European Green Digital Coalition, as well as Signatory of the Climate Neutral Data Center Pact. With this commitment, OVHcloud supports two findings of BEREC's Report:
- The insufficient available and standardised data on energy efficiency;
 - The complementary role of third-party bodies and self-regulatory initiatives to develop standards as well as harmonised methodologies to evaluate the environmental impacts of ICTs.

5) Please enter your comments on Chapter 5 (Key findings of the external study) here:

- OVHcloud insists that data centres are a source of energy-efficient and sustainable digital services moving forward. Remarkable efforts by the industry have been carried out, demonstrated for instance by the constitution of the Climate Neutral Data Centre Pact (CNDCP).

6) Please enter your comments on Chapter 6 (Conclusions and outline for BEREC's future work on sustainability) here:

- As the EED will soon be adopted and therefore must be transposed into National law, there is a need to coordinate actively the efforts around increased sustainability of data centres, and the ICT sector more broadly.
- We want to stress the need to involve the industry within any studies carried as it has, over the past years, invested heavily in its sustainability.
- Finally, we would like to suggest BEREC to eventually create and coordinate a taskforce across the several initiatives carried by the European Commission or by connected institutions. This will ensure the complementarity and effectiveness of the findings delivered.

7) Please enter any other comments you may have:

OVHcloud's key environmental indicators and sustainable policy can be found under following link:
<https://corporate.ovhcloud.com/en/sustainability/environment/>

Please upload here any supporting document that you deem relevant:

In accordance with the BEREC policy on public consultations, BEREC will publish all contributions and a summary of the contributions, respecting confidentiality requests. Any such requests should clearly indicate which information is considered confidential.

Confidential contribution:

- ☐ Yes
☐ No

If yes, please specify the information which should be treated as confidential:

Background Documents

[Draft BEREC Report on Sustainability](#)

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