

# 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)**.

\* Name

Inês Nolasco

## Organisation

Vodafone Group

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\* email

ines.nolasco@vodafone.com

## Feedback on each chapter of the Draft Report

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

Vodafone welcomes BEREC's draft report which compiles the key results of BEREC's groundwork on ICT sustainability and provides an outline of BEREC's approach to environmental sustainability.

Our motto is to 'connect for better future' and we are optimistic about how technology and connectivity can change the future in a positive way and make sure it does not come at the cost of our planet. We are a founding member of the European Green Digital Coalition, committing to significantly reducing our carbon footprint by 2030, and becoming climate neutral by 2040 . We have also committed to enabling the reduction of 350m tonnes of carbon emissions between now and 2030 through our IoT solutions for businesses.

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

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

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

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

Comments on Chapter 5.3. - The potential levers available to limit the sector's environmental footprint

Promote physical infrastructure and network sharing

Vodafone welcomes the study reference to levers available to the NRAs to act on sustainability e.g. the promotion and re-use of existing physical infrastructures (PIA) and co-ordination of civil works in accordance with the BCRD as well as co-location or sharing of network elements and facilities as foreseen in article 44 of the EECC.

Indeed, the costs associated with PIA infrastructure account for a great proportion of the overall costs of fixed and mobile network deployment so greater coordination and sharing is definitely welcomed. Measures supporting effective network deployment and operation will not only ensure a lower environmental impact of network deployment but also leverage the networks crucial green- enabling potential. The BCRD review is an opportunity an opportunity to address various barriers to network deployment.

Vodafone is of the view that fixed and/or mobile network sharing also has a key role to play in reducing the environmental impact of network deployment – its helps reduce energy consumption and network radio emissions - while also significantly contributing to more efficient investment and speedier network deployment.

We disagree that a trade-off exists between network sharing and the regulatory objective of promoting infrastructure competition and incentives for alternative fixed and mobile operators to invest in own infrastructure (to achieve higher coverage and/or quality) and that network sharing undermine operators' ability to innovate.

Fixed and mobile network sharing agreements, if correctly devised, give operators (i) control over key network parameters, (ii) the ability to upgrade to new technologies, (iii) full independence in servicing retail customers - which means operators' competing capabilities and independence are not undermined but safeguarded in a sharing scenario. Commercially agreed fixed and mobile network sharing have a key role to play in ensuring more sustainable deployment and must thus be promoted and facilitated.

Ensure copper switch-off with a migration path

With regard to legacy copper switch-off and the role which NRAs could play in this regard, Vodafone cautions against the lifting of access obligations on the copper legacy network without a proper migration path having been devised and alternative products - of at least comparable quality - providing access to the upgraded network being made available in line with article 81 of the EECC. Competition must be safeguarded in the transition to VHCN.

Technology neutrality is key

Vodafone also welcomes the recognition that NRAs must abide by the principle of technology neutrality and the requirements set out in the EECC for NRAs to promote VHCN, which includes not only FTTH but also cable networks. Discriminatory approaches regarding deployment incentives must be avoided.

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

## Comments on Chapter 6.2. – Outline of future work

### Need for standardised data and analysis

Vodafone agrees that standardised data and analysis are essential to understand the digital markets' environmental footprint and to determine the relevant indicators related to the sustainable provision of services and development of networks. The identification and definition of indicators and the setting up of a common and harmonised EU assessment technology for the environmental sustainability of ECN/ECS is a first needed and welcomed step. Vodafone is happy to collaborate with BEREC and other bodies in this workstream (notably via the European Green Digital Coalition).

### Migration and switch-off of legacy technologies

BEREC states that "While keeping in mind its goals of promoting competition, connectivity and end user empowerment, BEREC could also encourage migration to next-generation technologies and switch-off more energy-intensive legacy technologies, considering the implied environmental benefits and potential drawbacks."

Vodafone welcomes the support for the switch-off of older mobile technologies (e.g. 2G/3G) which will lead to lower volumes of and more efficient network equipment, enables more efficient spectrum use, and thus lower energy consumption.

As to copper legacy network switch-off, Vodafone recalls that switch-off promotion must go hand in hand with safeguarding competition and thus the availability of a proper migration path and alternative access products over the upgraded network.

### The role of spectrum policy

Efficient spectrum policy can also play a key role in promoting environmental sustainability.

By ensuring that sufficient spectrum resources are available and avoiding setting undue requirements, NRAs or bodies with spectrum management functions can reduce the network deployment environmental footprint.

Key elements include:

- (i) Making sufficient spectrum resources available – decreases the number of mobile sites needed, leads to lower energy consumption, and avoids network and equipment duplication. These spectrum resources should include more low band at 600MHz and more high band at 6GHz (which is the last opportunity to get new wide bandwidth spectrum for MNOs that can still be deployed widely on our wide area network sites) – which are essential bands to ensure high performing and efficient networks in Europe).
- (ii) Allowing operators to switch-off older mobile technologies (2G/3G) – leads to lower volumes of and more efficient network equipment, enables more efficient spectrum use with newer technologies and thus lower energy consumption.
- (iii) Avoiding excessive coverage and data speed obligations – enables the optimization of network operations and energy consumption, ensuring the deployed network equipment matches effective demand.
- (iv) Avoiding high spectrum prices - high spectrum prices negatively impact network deployment.
- (v) Promoting mobile network sharing, including active sharing - avoids the duplication of sites and equipment and leads to lower energy consumption.

7) Please enter any other comments you may have:

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](#)

## **Contact**

Sustainability\_PC@bereg.europa.eu