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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:

n/a

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

n/a

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

n/a

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

n/a

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

n/a

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

1. Based on the current scope of the EU taxonomy and the first investment disclosures by network operators, there's only a small portion of operator investments that could be eligible under the EU's taxonomy. This does not reflect the key role of digital connectivity in achieving the sustainability goals of the Green Deal, and it does not contribute to the transparency levels that BEREC envisages for sustainability across the EU's different industries. Huawei encourages BEREC's support in extending the scope of the EU taxonomy with relation to the "building and operation of network infrastructure (5G, Fiber/FttH, and energy efficiency improvements solutions)" - explicilty identifying these as environmentally sustainable economic activities would be crucial in conditioning investments and sustainability uptake in the EU's Single Market and beyond.

2. Huawei recommends BEREC taking the lead in harmonising standards and indicators developed by SDOs (ETSI, ITU, etc.) and industry associations. This will enable industry players to operationalise and systematically improve the transparency of ICT carbon emission intensity, network energy efficiency standards and indicators, both in terms of gaps, and joint-efforts to accelerate delivery. In terms of measuring ICT carbon emission intensity and network energy efficiency, Huawei proposed NCI (Network Carbon Intensity) and NEE (Network Energy Efficiency) indicators. Apart from conditioning investment, these indicators could allow to further consider user experience and network traffic, respectively.

3. Based on the key role that green energy supply can contribute to the reduction of GHG emissions in ICT industry, Huawei recommends BEREC to introduce a framework for energy-related incentives and subsidy policies at national level, in order to encourage stakeholders' innovation and investment in energy efficiency improvement and energy saving domain (such as self-powering, solar energy, high efficiency batteries, energy storage construction, etc.). In addition, regular reporting on energy-efficiency improvement application, and best practices will help to achieve large-scale deployment within the EU region.

4. As already explored in BEREC's draft report on sustainability, the ICT sector can play a very important role in reducing carbon emissions in other industries. This is why Huawei suggests that BEREC should set up a transparency platform for ICT carbon reduction enablement effects (carbon handprint) in industries like transportation, electric power, industry and agriculture. The regular publication of research progress, public consultation and best practices could strengthen the transparency and leverage on value of ICT industry to achieve sustainability targets in various industries.

7) Please enter any other comments you may have:

n/a

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:

n/a

Background Documents

Draft BEREC Report on Sustainability

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