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Draft BEREC Report on Sustainability: Sustainability Indicators for Electronic Communications Networks and Services

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Body of European Regulators
for Electronic Communications
BEREC

During its 54th plenary meeting (9th and 10th March 2023), the BEREC Board of Regulators has approved the [Draft BEREC Report on Sustainability: Sustainability Indicators for Electronic Communications Networks and Services for public consultation](#).

This Draft Report aims to help identify relevant sustainability indicators which are instrumental in measuring and communicating the environmental footprint of the electronic communication sector. It also analyses the potential role of National Regulatory Authorities (NRA) to participate in efforts to harmonise methodologies in order to define sustainability indicators for ECN/ECS.

It provides an outline of the results of BEREC's groundwork on sustainability indicators which includes: an overview of existing regulations and of stakeholders' approaches, a review of current NRAs' activities related to sustainability indicators and an analysis of adoption and support level of a set of sustainability indicators among industry players.

In this Draft Report BEREC also assesses some of the main challenges to increase environmental transparency in the electronic communications sector.

BEREC continues to build up its knowledge on the important topic of sustainability to be able to contribute with its expertise in shaping the twin, green and digital, transition.
Collaboration with relevant stakeholders is of importance in this process, especially for knowledge and

information exchange related to ICT sustainability.

All stakeholders are invited to submit their inputs via EU survey portal no later than 12 April 2023 (17:00 CET).

Contributions should be preferably submitted in English.

In case you are facing any difficulties with the platform, please send your questions and queries to Sustainability_PC@berec.europa.eu. No contributions are accepted on this address.

Please ensure that the overall size of the email (including attachments) is not larger than 2 MB.

We strongly encourage all stakeholders to submit their contributions as early as possible. Contributions received after the above-mentioned deadline will not be taken into account.

All contributions received will be published on the BEREC website, taking into account requests for confidentiality and publication of personal data. Any such requests should clearly indicate which information is considered to be confidential.

* Name

> Patrick Blankers

Organisation

> Ericsson

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- ○ CY - Cyprus
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* Email

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Feedback on each chapter of the Draft Report

1) Please enter your comments on executive summary and chapter 1 (Introduction and objectives) here:

General comments:

For future work on developing indicators and fostering transparency, BEREC is encouraged to work closely with the SDO´s in particular ITU and ETSI.

The proposed need to harmonize measurements between nations is recognized and encouraged. Moreover, international standards are preferred over regional ones when considered feasible and relevant.

KPI´s are only well-defined together with a measurement/assessment methodology. In general, assessment methods may be available and defined although the KPI is not defined.

When developing indicators it is recommended to distinguish between transparency and comparability (between companies/products). These two purposes would demand different level of accuracy and different methodologies, especially when considering life cycle/value chain impacts that can only be assessed not measured.
Comparability demands control over or normalization of contextual factors
ITU L.1410 elaborates on challenges when it comes to comparability (see L.1410 Appendix XIII-IX).

Ericsson has a number of recent studies that could be relevant to inform continued work on impact assessments:
•   Electricity Consumption and Operational Carbon Emissions of European Telecom Network Operators (2022), https://www.mdpi.com/2071-1050/14/5/2637
•   Assessing Embodied Carbon Emissions of Communication User Devices by Combining Approaches (pre-print, 2023), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4258869
•   Ericsson has also recently submitted a study on ICT footprint 2020 (based on collected 2020-data to the extent possible)
A key data set representing a main data gap that authorities could collect would be long term measurement of device electricity consumption in households.

Page 4, paragraph 2 and following:

For coming work it is important to more clearly distinguish between indicators for ICT companies and indicators for ICT products, networks and services, as these are different and need different contextualization. In the present report (and the questionnaire) this distinction is not clear (except in the table), and this makes conclusions less obvious. The least frequently collected indicators seem to be those that would more commonly be calculated at a product level (as part of an LCA). This raises the question whether the suggested "relevance" refers to the company level assessment, the product level assessment or both.

For products: The document mainly refers to PEF, ISO LCA standards and put forward the need for PCRs (Product Category Rules). However, the joint standard ITU L:1410/ETSI 203 199 (ITU/ETSI LCA standard) gives more detailed and specific guidance for ICT goods, networks and services and should be considered for any PCR. ITU-T and ETSI is currently revising this standard to provide further guidance for consideration of several life cycles. They have also started work on simplified LCA. Moreover, ITU has opened several work items related to the assessment of products.

For companies: ITU L.1420 (currently under revision) complements ISO 14064-1 and GHG protocol with specific guidance for ICT companies. ITU is also about to publish scope 3 guidance for telecom operators. Moreover, at a sector level it has defined four applicable standards: ITU-L.1450 (assessment guidelines for ICT sector GHG emissions), ITU-T L.1470 (decarbonization trajectory), L.1471 (Net zero for ICT organization)

Page 5 paragraph 8: Work on standardized, comparable groups of metrics would preferably be developed by formal SDOs

Page 5 bullet 1: The ITU/ETSI LCA (multi-criteria) standard provides the most accurate methodology for ICT and would be important to consider also in the context of applying PEF.

Page 6 after bullet list:
If an impact assessment is established it would be important to distinguish clearly between the product and company perspective

Page 7 item 4 and last paragraph:
It would be important to work closely with the SDOs to avoid duplication and to anchor assessment methods in established methods. Moreover important to develop the KPIs jointly with the methodology

Page 8 paragraph 2+ general:
Important to distinguish between net zero (see L.1471, ISO IWA42 Net zero guidelines etc) and climate neutral/carbon neutral. Net Zero is the key concept directly associated with a company´s value chain+removals of a minor residual part, while climate neutral/carbon neutral involve offsetting outside the value chain.

2) Please enter your comments on Chapters 2 (European Framework) and 3 (Results from stakeholders' workshops on environmental transparency and related reports) here:

Section 3.2 and 3.4 3rd paragraph:
The workshop with academics and civil society organizations seems not to accurately represent the original research and diverse views of these groups which risks leading to biased conclusions. For future studies it is recommended to have a wider representation.

Page 20, last paragraph:
"He affirmed that Internet traffic currently accounts for a significant part of ICT electricity consumption and it has extremely increased during the last 20 years." It is the internet traffic that has extremely increased, not the ICT electricity consumption – this is not clear from the sentence.

Page 31, paragraph 2:
Regarding the need for one common methodology – adding new methodologies may not lead to a wider consent. The main focus should be on reusing and improve existing standards. It is often stated that standards are lacking – however in several cases standards may exist but may not be sufficiently known.

Page 31, last paragraph:
From the perspective of applying ICT solutions in other sectors, besides EGDC, ITU-T has established a methodology for assessing the impact of such solutions (L.1480). Moreover, WBCSD has recently published guidance on avoided emissions.

3) Please enter your comments on Chapter 4 (National regulatory authorities' approach to environmental transparency and indicators) and ANNEX II (Additional information and graphs on answers to BEREC questionnaire to national regulatory authorities) here:

4) Please enter your comments on Chapter 5 (Analysis of industry players feedbacks on environmental reporting practices and sustainability indicators) and ANNEX I (Additional information on answers to BEREC questionnaire to industry players) here:

Section 5.1:
The strong numerical representation of operators (compared to providers) may impact results. Ideally it would be better to distinguish between providers and operators when analysing results.
Moreover, it would be important to more clearly distinguish between a company and a product perspective.
The term "relevance" has not been defined which makes it hard to interpret results – it should be clarified from which perspectives it should be relevant.

Section 5.4.3: coming initiatives include SBTN and TNFD

5) Please enter your comments on Chapters 6 (BEREC preliminary conclusions on sustainability indicators) and 7 (Next steps and future work for BEREC) here:

Page 47, last paragraph:
Ericsson has two published peer reviewed papers on ICT and planetary boundaries which might be of interest:
• Establishing the planetary boundaries framework in the sustainability reporting of ICT companies – A proposal for proxy indicators (2022, Erlandsson, Bergmark and Höjer), https://www.sciencedirect.com/science/article/pii/S0301479722026056
• Towards considering Planetary Boundaries in Life Cycle Assessments of ICT (2022, Bergmark & Zachrisson), https://ieeexplore.ieee.org/document/9830102

Section 6.2, paragraph 2
The forecast for 2030 is not a generally accepted one. Scope 3 is an integrated part of net zero. This helps drive the development.

6) Please enter any other comments you may have:

Please upload here any supporting document that you deem relevant:
Only files of the type pdf,doc,docx,odt,txt,rtf are allowed

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.

* Do you request some information to be considered as confidential?
  ○ Yes
  ● No

Background Documents
Draft BEREC Report on Sustainability

Contact
Sustainability_PC@berec.europa.eu

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Contact Form