

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

Fields marked with * are mandatory.



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

Ross Creelman

Organisation

ETNO

EU member states

- AT - Austria
- BE - Belgium
- BG - Bulgaria
- HR - Croatia
- CY - Cyprus
- CZ - Czechia
- DK - Denmark
- EE - Estonia
- FI - Finland
- FR - France
- DE - Germany
- EL - Greece
- HU - Hungary
- IE - Ireland
- IT - Italy
- LV - Latvia
- LT - Lithuania
- LU - Luxembourg
- MT - Malta

- NL - Netherlands
- PL - Poland
- PT - Portugal
- RO - Romania
- SK - Slovak Republic
- SI - Slovenia
- ES - Spain
- SE - Sweden
- XY - Other

* Email

Feedback on each chapter of the Draft Report

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

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

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:

ETNO acknowledges the significant work BEREC has been undertaking to help identify relevant sustainability indicators and assess some of the main challenges to increase environmental transparency in ICT.

At the same time, we would like to take this opportunity to request a broader discussion with regard to carbon and energy intensity indicators, as we find these to provide valuable and comparable information regarding the management and actions being undertaken within organizations to limit environmental impact.

Section 5.4.3 of the report mentions KPIs “carbon intensity” (which shows the CO₂e emissions in proportion to the transmitted data volumes) and “energy intensity” (regarding energy consumption in proportion to the transmitted data volumes) as being considered as “other indicators considered important by the respondents to estimate environmental performance by industry players”.

However, there is very limited information with regard to these indicators throughout the draft report. ETNO and its members find it relevant to deepen the answers and results that were obtained from all the consultation methods that were carried out regarding intensity indicators.

Some specific queries that arise in this sense are:

- When analyzing the metrics reported in Annex I related to Carbon emissions, we can see that the only relative metric shown is the tCO₂/M€ (intensity using million-euro revenues). Could it be possible to include collected data or results on metrics related to tCO₂/ energy consumption (MWh), tCO₂/Petabyte?
- When analyzing energy efficiency metrics, in Annex I, the most relevant ones related to measuring the number of petabytes transmitted per energy consumption are: TB of data/ GWh, Petabyte/kWh, Mb/kWh. However, we find that these metrics do not properly show and address the most relevant environmental impacts.

In terms of environmental indicators, "kWh per petabyte" is probably more valuable, as it indicates energy is being used to process and store a given amount of data (energy efficiency), which is directly related to GHG emissions associated with the production of electricity. "Petabytes per kWh consumed" indicates the amount of data that can be processed with a given amount of electrical power, which is useful for comparing the efficiency of different data centers in terms of data processing, but less so in terms of environmental impact.

In fact, in section 2.2 of the report, the “Study on Greening Cloud Computing and Electronic Communications Services and Networks Towards Climate Neutrality by 2050”, proposes the use of “the favorable treatment of energy efficient networks (kWh/GByte) in State Aid and with respect to permit granting”, indicating this way, the importance that these types of indicators have on measuring impacts and can thus be used as thresholds to compare energy efficiency practices.

For this reason, we consider appropriate to include this kind of energy efficiency indicators discussion and mention in the report: MWh/petabyte, kWh/gbyte.

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

We are convinced that the optimal and efficient way towards common EU indicators for network-specific sustainability requires the dialogue between policymakers and the industry players. The telecoms industry in Europe has a proven record of the ability to agree on effective common standards, processes and approaches. This is demonstrated by engagement in such bodies as the European Green Deal Coalition. As such, regulatory harmonization would be redundant.

We also recommend that reporting of sustainability indicators, whenever implemented, is not limited to the largest operators. Otherwise, such reporting would likely miss capturing the environmental impact of a substantial part of market – while the individual environmental impact of each of the smaller operators is supposedly minor, taken together they may still account for a substantial share of that impact.

In our view, BEREC could explore ways how “greening” of networks should be linked to the sectoral regulation, e.g. incentivising investment in more sustainable network technologies by alleviating the regulatory burden. For example, network elements deployed via more sustainable methods (such as micro-trenching etc.) should be subject to lighter SMP regulation, if at all. Last not the least, for reasons of efficiency and proportionality, the introduction and/or extension of reported sustainability indicators should preferably not lead to an increase in the reporting burden upon operators.

6) Please enter any other comments you may have:

We agree with the conclusions of the draft report, that the most relevant environmental sustainability indicators for the ICT sector are those related to measuring energy consumption and GHG emissions.

However, we request that BEREC elaborate further on the results obtained from the different stakeholders regarding carbon and energy intensity metrics, as these could potentially serve as a threshold and criteria used for many emerging regulations aiming at measuring and quantifying the impacts from the ICT sector, e.g. EU Taxonomy. For these reasons we find it a priority issue for these types of indicators to be further shared, discussed and implemented through all stakeholders in the sector.

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

Contact

[Contact Form](#)