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

> Fields marked with * are mandatory.

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

> Sofia Calabrese

Organisation

> EWIA - European Wireless Infrastructure Association

EU member states
- ○ AT - Austria
- ● BE - Belgium
- ○ BG - Bulgaria
- ○ HR - Croatia
- ○ CY - Cyprus
- ○ CZ - Czechia
- ○ DK - Denmark
- ○ EE - Estonia
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○ NL - Netherlands

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○ SK - Slovak Republic

○ SI - Slovenia

○ ES - Spain

○ SE - Sweden

○ XY - Other

* 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:

> EWIA welcomes the work of BEREC on sustainability and the effort to establish a fruitful dialog with stakeholders, scientific and civil society and specialized agencies. EWIA is the European association of independent wireless infrastructure operators www.EWIA.org. EWIA takes note of the information and directions contained in the report which will be taken into account in upcoming work on sustainability.

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

> EWIA wants to thank the BEREC sustainability WG for inviting us to speak at the stakeholders workshop in 2022, and for providing a faithful summary of the exchanges in chapter 3. As envisaged during the workshop, EWIA has commissioned to EY-Parthenon a study on some of the questions raised during the workshops, and the corresponding report has been published in March 2023. We are pleased to provide the report in background information to this response, and to share in the frame of this public consultation some key takeaways:.
> -   The report identifies briefly the opportunities provided by the wireless communication sector in the fight to the climate change but also the associated problematics of rolling out more sites and the related energy increase.
> -   To answer this problematic, the study highlights the very pragmatical way that the independent towerco model can contribute to mitigate those 2 concerns, through our efficient passive infrastructure sharing model which would avoid the creation of 109 000 new towers in Europe until 2030, assuming we reach a of 50% market share for sites outsourced to independent towercos in Europe.
> -   In such a scenario, the overall benefit over 10 year would amount to avoiding 4 M tonnes of CO_2: about half related to one shot savings due to needing less sites (steel and concrete) and half related to recurring savings in energy.
> -   This gain is relative to a counterfactual scenario where the share of towers outsourced to independent towercos remains at the same level as 2018 in Europe (17%). The objective of 50% share of outsourced tower sites at the horizon 2030 is realistic, many regions of the world are beyond that and in Europe currently we are halfway there, with a market share at 35% end 2021.
> -   Annualized, the CO_2 emission gain is equivalent to taking 200 000 cars off the road, or CO_2 of human activities of 570 000 European.

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:

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

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

9a34813f-0aea-4dc3-a983-cb334d95c9da/Sustainability_report_-_summary_and_link.pdf

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

The sustainability contribution of the European independent TowerCos sector

European Wireless Infrastructure Association

Recently, EWIA has been working on sustainability in our sector, in particular drafting a report with EY Parthenon on **The sustainability contribution of the European independent TowerCos sector**

Access to fast, reliable and ubiquitous connectivity represents a unique opportunity for European citizens to unleash economic growth by exploiting the potential of new telecommunication technologies like 5G and IoT.

Mobile data consumption is expected to continue growing in the next decade, and governments across Europe are supporting further rollout of 5G outside urban centers.

Together, these factors will require the deployment of new tower sites to provide coverage in new areas and to increment network capacity in densely populated areas.

You can find more information by reading the full study here.

Some of the main findings:
- Deploying this infrastructure will not come without a cost for the environment. Building a new site requires significant quantities of steel and concrete, two of the most carbon-intensive construction materials.
- Independent TowerCos, thanks to their inherent infrastructure sharing, are the most carbon-efficient way to deploy the infrastructure network needed to satisfy the demand for data consumption expected by 2030.
- Thanks to the ability to host active equipment from multiple mobile operators, a scenario where independent TowerCos are responsible for the deployment of 50% of all towers by 2030 will result in 109,000 fewer towers being built.
- Compared to current carbon offsetting strategies, in an independent TowerCo-led deployment scenario CO_2 emissions associated with building and operating fewer towers will result in avoided, and not compensated, emissions.
- A TowerCo-led deployment by 2030 in Europe will result in the avoidance of almost 4 million tons of CO_2 emissions. This is the equivalent of taking almost 200,000 cars off the road each year. Over 2 million tons of emissions will be saved through reduced energy usage, 1.1 million tons from reduced steel usage, 0.6 million tons from the reduced concrete requirements, and the remaining 0.1 million tons from emissions associated with construction.
- Additionally, a TowerCo-led deployment scenario will mean a decrease in the sector's environmental visual pollution as fewer towers will have to be deployed, especially in rural areas.
- Further reductions in CO_2 emissions are expected following a reduction in travel to and from the towers by maintenance teams.
- Additionally, independent TowerCos will play a crucial role in enabling new technologies aimed at reducing carbon emissions of businesses and households.

- Supporting the deployment of 5G, independent TowerCos will enable a network of smart sensors, smart grids and connected devices that will support the de-carbonization of multiple industries in the future.
- Finally, independent TowerCos are leading the industry efforts to introduce new technologies and processes to decrease the carbon footprint of the sector. From the use of renewable energy sources in towers not connected to the grid to the deployment of technologies to monitor and reduce maintenance needs, independent TowerCos are proving that connecting Europe can be done in a sustainable, carbon-efficient way.

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