



Liberty Global contribution to consultation on Draft BEREC Report on Sustainability: Sustainability Indicators for Electronic Communications Networks and Services

Liberty Global appreciates the opportunity to respond to BEREC's consultation on its draft report on sustainability indicators. Liberty Global strongly supports the European Commission's goals of reducing Europe's emissions and achieving a green and digital transition of the economy. We recognise the role that the ICT sector must play in achieving this transition and have invested heavily in upgrading our infrastructure, resulting in energy savings and reduced emissions. We also work to reduce waste through recycling and refurbishment. We are founding members of the European Green Digital Coalition, committing to the development of green technologies and to the creation of new tools to measure environmental impact.

The regulatory instruments used to support sustainability should be appropriate, proportionate and abide by the principle of technology neutrality. Also, they should preserve legal certainty. This will in turn enable technology to support the green transition. Sustainability initiatives must also account for other key regulatory aims. We support BEREC's work in relation to sustainability but believe it is important that BEREC can demonstrate a clear legal mandate to avoid legal uncertainty.

Harmonisation of indicator frameworks should be international

BEREC rightly identifies that harmonisation of environmental measurement standards and indicators would be useful for operators seeking to implement increasingly complex regulatory requirements around sustainability reporting. The Corporate Sustainability Reporting Directive (CSRD) and the EU Taxonomy are both identified as critical opportunities for increased harmonisation of standards and BEREC should feed into the developments of the standards used under the CSRD.

BEREC should also note that the challenges presented by a fragmented reporting framework is not confined to the EU; many players operate internationally and as such are subject to multiple and diverging sustainability reporting requirements. Policymakers and regulators – including BEREC and NRAs where they have a clear mandate – should work with their counterparts in other jurisdictions on harmonised standards. This would also benefit end-users, as they can more easily compare operators internationally.

Role of NRAs

The role of NRAs in supporting sustainability initiatives should be carefully considered, in particular their role in data collection. Operators are subject to increasing reporting requirements on sustainability indicators, as evidenced by the upcoming CSRD and national initiatives mentioned in the report. It is not useful – and not appropriate nor proportionate – to duplicate or expand these reporting requirements by requiring operators to provide sustainability information to NRAs. It is also not clear that NRAs are necessarily best placed to monitor sustainability indicators across the sector, given the multi-faceted nature of many telecommunications businesses. There should not be



an expansion of the remit of NRAs to collect data on sustainability indicators through revision of the European Electronic Communications Code (EECC).

BEREC's role in aiding transparency

It is useful for operators to understand differing regulatory obligations across jurisdictions. The collation of the various approaches taken by different NRAs in this report is very useful. BEREC should continue to monitor NRAs' work in this area and make this information publicly available. This would be useful for actors across the sector, and more widely it would be useful for policymakers in the process of developing these indicators through the CSRD and other legislative initiatives.