

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

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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@bereg.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

Marja Matinmikko-Blue

Organisation

University of Oulu, Finland

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:

University of Oulu thanks BEREC for the opportunity to provide feedback on the sustainability work at BEREC. The current heading of the draft report is about “sustainability indicators for electronic communications networks and services”, which is a very important and timely topic. According to the well-known triple-bottom line of sustainability, there are three interrelated perspectives of sustainability including social, economic and environmental perspectives, which also apply to the ICT sector. The current draft report focuses solely on the environmental sustainability of the ICT sector. Social and economic sustainability dimensions and related indicators are not considered, which is a major limitation that should be addressed in the current draft report and worked on in the future work of BEREC. It would be useful to understand, how BEREC addresses the bigger topic of sustainability, stemming from the internationally agreed UN SDG framework and the triple bottom line, and how BEREC considers the role of ICT sector in tackling major sustainability challenges in addition to assessing ICT sector’s own environmental burden.

To better reflect the contents of the report, the current heading should include the term “environmental sustainability indicators” instead of the broad term “sustainability indicators” to avoid the impression that the report includes all relevant aspects of sustainability. Additionally, further work on the three interrelated sustainability perspectives would be important to be conducted at BEREC.

Regarding the terminology used in the draft report, the term “environmental transparency” is used as the main term including chapter headings. However, there is no explanation or definition for the term in the text or Glossary. It would be important to create a common understanding of the terminology in the field to guide the development of the important topic. Moreover, the term “sustainability” is often used when specifically talking about the environmental sustainability, which could be replaced by the term “environmental sustainability”.

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

Chapter 2 on European Framework presents a good overview of European regulatory activities on the topic. However, it does not include all related activities, such as Radio Spectrum Policy Group's (RSPG) work to combat climate change on identifying methodologies to assess the energy efficiency of wireless technologies, collecting practices on measuring and managing energy efficiency around spectrum, collecting data to assess energy efficiency, and assessing how efficient spectrum policies can facilitate to reduce carbon emissions. It would be good to clarify the link of the BEREC work to the RSPG work.

Chapter 2 does not include any standardization activities, which are important part of the European framework addressing the environmental sustainability topic and should be included in Chapter 2. Standards are included in the questionnaire sent to companies but not in the draft report. The current draft report does not establish a proper link to the prior and on-going standardization work on the environmental sustainability of the ICT sector. Establishing this link would be important to create a common understanding of the complex topic and a pre-requisite for any assessment of the environmental sustainability and the development of solutions.

Chapter 3 on stakeholder interaction with public authorities and international bodies includes workshops with representatives from RSPG, ITU-T and OCDE-NER. This is a rather limited set of organizations to cover public authorities and international bodies working on the environmental sustainability of the ICT sector. For example, other standards bodies (e.g., ETSI, ISO) that play a key role in conducting environmental sustainability related standardization activities are missing.

The workshop with academics and civil society organizations included three research representatives and one civil society organization. This is a very small set of representation from these stakeholder groups, considering the research efforts spent on the topic at national and European level, and the importance of the topic for end users. In fact, the inclusion of independent research into the environmental sustainability of the ICT sector is of utmost importance to get unbiased perspectives and results into the discussions. Creating methods for involving independent research conducted in academic and other organizations into the regulatory process should be a priority, particularly in the sustainability topic where the research community plays a key role.

Workshops with industry associations included representatives from ECTA, ETNO, EWIA, FTTH Council, and GSMA, which is a bigger set of representatives compared to public authorities and international bodies or academics and civil society organizations.

Regulators' inputs to the process are collected via a questionnaire. Additionally, companies' inputs are collected with a separate questionnaire. These two surveys have been good sources of inputs to the process. However, there was no questionnaire sent out to research community or other stakeholders including end user representatives. Wider engagement of stakeholders would be important for a study on the environmental sustainability of the ICT sector especially including independent research community and end users instead of focusing on the companies in the sector itself to define the contents.

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:

The collection of NRAs' activities on the environmental sustainability of the ICT sector reveals the status of in Europe – very few NRAs have collected information from the ICT companies. Moreover, the collected indicators differ. This lack of coherent data collection approaches at national level is a major finding of the study.

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:

The stakeholder classification is not clear in terms of what the difference between a telecom operator and a service provider is. The questionnaire included standards, but they were not included in the main body of the draft report even though they are important (mainly Chapter 2).

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

Chapter 6 on the preliminary assessment on sustainability indicators is limited to the environmental sustainability. It would be important to expand the scope from environmental sustainability to consider social and economic dimensions of sustainability and their interrelations and trade-offs in the future work of BEREC.

In addition to the environmental footprint of the ICT sector, the handprint effect should also be considered including the enablement effect of using ICT solutions in other sectors of society to reduce their environmental footprint and solve sustainability challenges. This should be addressed in the future work of BEREC.

Many national and EU level research initiatives address the sustainability of the ICT sector and especially the environmental sustainability perspective. There is a need to bring the expert community of researchers and other experts to the table. BEREC should build a bridge between the regulatory domain and the research domain by building linkage to national-level and EU funded research projects by creating mechanisms for information sharing, requirements collection and joint development of best practices. BEREC should invite the research community to provide unbiased research results and encourage the industry and operators to share their data and methodologies with the research community, to tackle the big ICT sector's sustainability topic as a joint effort.

6) Please enter any other comments you may have:

Independent research conducted at academic and other organizations plays an important role in the topic of sustainability, balancing the self-interests of stakeholders towards the common good. There is a need to develop mechanisms that allow the voices from the academic stakeholders to be heard in the process beyond what was done in this study. For example, EU-funded and national-level funded research projects address sustainability topics and can significantly contribute to regulatory activities, when there are mechanisms in place for the information exchange.

In addition to the research domain, significant efforts on the environmental sustainability of the ICT sector take place in standardization bodies, which are not clearly addressed in the draft report. The expertise within these standardization bodies is directly relevant to the topics of the draft report and a mechanism is needed to share that knowhow in the future work of BEREC on sustainability. The current report did not include a summary of the relevant standards and on-going efforts in Europe, which further increases the separation between the important and interrelated activities.

Terminology used in the draft report varies and differs from many other forums dealing with the sustainability of the ICT sector. For example, the heading of the entire report is about sustainability indicators while the chapter headings are about environmental transparency. Clear explanations for the used terminology would act as guidelines for the entire community to work on the sustainability topics. Although there is a glossary in annex, different terms are used interchangeably without specifying them in the text. There is a need to define a common terminology to characterize the environmental sustainability of the ICT sector, starting from its environmental impact. BEREC could have a role in this. The glossary does not include all terms used such as environmental sustainability, environmental transparency, etc.

The environmental footprint of electronic communication networks and services is the main focus of the draft report but there was no mentioning of the environmental handprint, i.e., the potential positive impact of the ICT sector. It would be important to mention and consider the handprint in the current report and in the future studies of BEREC.

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](#)