

Greening Action Plan of BEREC and the BEREC Office



12 March, 2024

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1. Introduction

The BEREC Office Management Board (MB) on 7 October 2022 at the 52nd Ordinary Plenary Meeting mandated the ENG Sustainability and the BEREC Office (BO) to start the work on two main actions that had been proposed to them:

1. A Greening Action Plan for BEREC and for the BEREC Office that will include targets and steps for Green House Gas (GHG) reduction.
2. Launching the process of preparing for EMAS certification (EU Eco-Management and Audit Scheme) by setting up of a BEREC Office cross-unit taskforce and to include this as a task in the BEREC Office SPD, aiming for certification by the end of 2025.

Prior to these decisions by the BO MB, the BEREC Office has been assessing since 2018 total GHG emissions of the operations of BEREC and the BEREC Office. This assessment has shown that the majority of GHG contributions of BEREC stem from business travels in Brussels and elsewhere. The same assessment has shown that the GHG contributions of BO stem from the electricity and gas consumptions for the heating of the Agency, the business traveling of the staff members as well as from the commuting of staff to/from work. All these are directly related to the office space the Agency occupies and with the number of staff who are present daily at the office or travel for business purposes.

The aim of this Greening Action Plan (GAP) is to formalise and to structure future actions and targets for reducing GHG emissions in line with the efforts of other EU institutions and bodies, namely the European Commission (EC) and other decentralised EU agencies that are members in the EU Agencies Network's Greening Network (EUAN GN). Cooperation with EU bodies, that are already EMAS certified and have ample experience in introducing, implementing and monitoring actions aimed at reducing environmental footprint, will be a cornerstone in BEREC's and the BO's strategy.



2. Background and Scope

Public institutions and bodies like BEREC/BEREC Office have a responsibility in taking action and leading by example when it comes to existential environmental challenges like the global climate crisis. In the respect, BEREC/BO is sharing the ambition of the European Commission to reach climate neutrality in its operations by 2030 and reduce its environmental footprint. The objective of reaching corporate climate neutrality by 2050 is a commitment from the European Commission, as part of the European Green Deal [1]. On the top, the 2030 climate and energy framework [2] adopted in 2021 includes the EU-wide targets and policy objectives for the period from 2021 to 2030. This set of proposals aim to make the EU's climate, energy, transport and taxation policies fit for reducing net greenhouse gas emissions by at least 55% by 2030 as compared to 1990 levels and become the first climate-neutral continent by 2050. The framework also sets as target for 2030 the increase of the use of renewable energy from 32% in 2021 to 42.5%.

In parallel, the 2030 Agenda for Sustainable Development [3], adopted by all United Nations Member States in 2015 sets environmental sustainability as the base and provides a shared blueprint for peace and prosperity for people and the planet, now and into the future. At its heart are the 17 Sustainable Development Goals (SDGs), which are an urgent call for action by all countries - developed and developing - in a global partnership. They recognize that ending poverty and other deprivations must go hand-in-hand with strategies that improve health and education, reduce inequality, and spur economic growth – all while tackling climate change and working to preserve our oceans and forests.

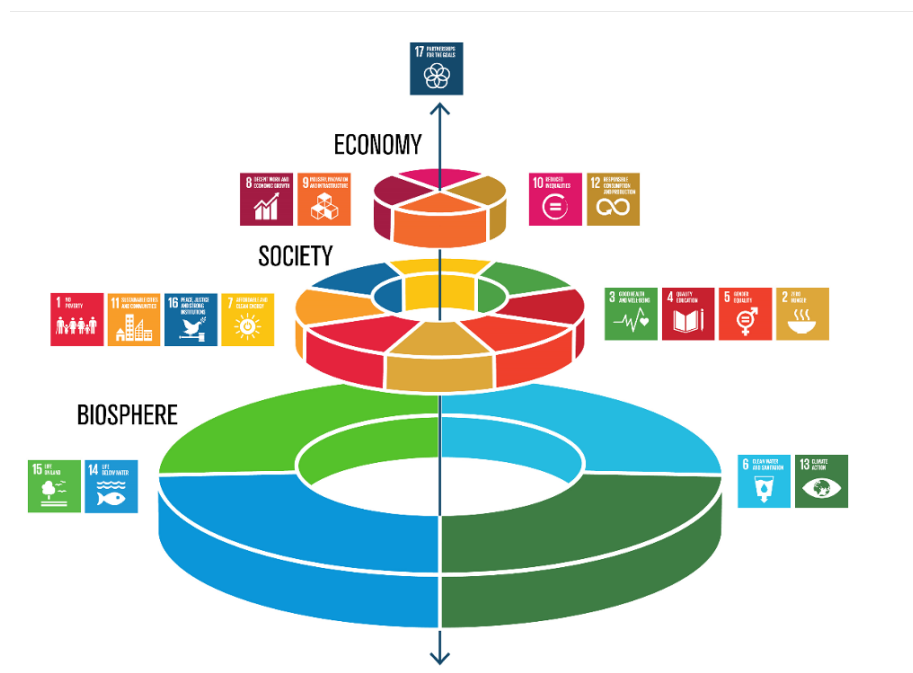


Figure 1: The UN Sustainable Development Goals

3. BEREC/BEREC Office's Environmental Policy

As particularly highlighted in the European Green Deal, the EU Institutions and bodies have the responsibility and made the commitment to lead by example in tackling climate and environmental-related challenges.

BEREC and the BEREC Office therefore should be committed to systematically and continuously reducing the environmental impact of its operations.

A cornerstone of this process will be to apply an environmental management system to all its activities by obtaining and maintaining registration with the EU's Eco-Management and Audit Scheme (EMAS) [4], fulfilling the requirements of the EMAS-Regulation as the figure below indicates. This Environmental Policy will be one of the first steps in the process of becoming EMAS registered.

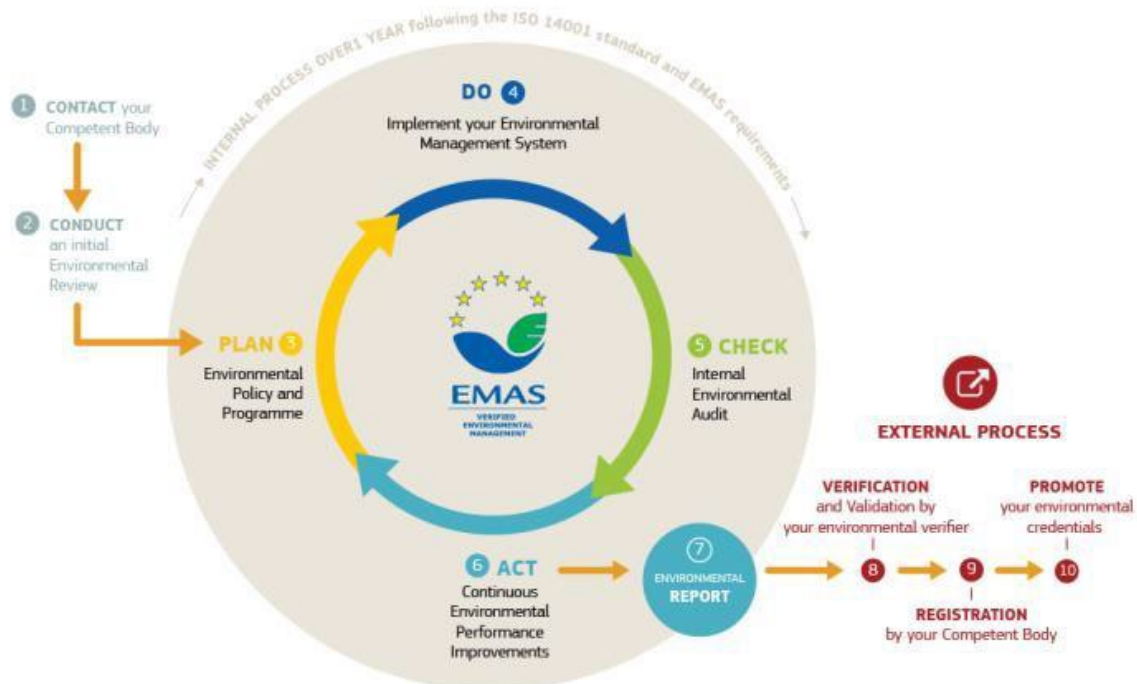


Figure 2: The EMAS process

A SWOT analysis of the application on an environmental policy for BEREC and for BEREC Office has been prepared and it is presented in the figure below.



Figure 3: SWOT analysis of the application of the environmental policy for BEREK and BEREK Office

Specifically, BEREK and the BEREK Office should commit to the following:

- Obtain and maintain EMAS registration by 2025 including continuous monitoring and improvement of their environmental performance;
- Establish environmental objectives and targets, and communicate in a transparent way the progress towards them;
- Comply with all environmentally relevant legislation and obligations, in particular the provisions of the EMAS regulation.

Key priorities are:

- the reduction of overall CO₂ emissions, in particular by reducing aviation-based business travels;
- the efficient use of natural resources (mainly energy, water and paper);
- waste prevention, recycling and re-use;
- select green parameters in public procurement of BEREK Office;
- promote sustainable mobility;
- promote sustainable spaces, namely with energy generators and respecting / incentivizing local flora and fauna.

In particular, BEREC and the BEREC Office should commit to achieve carbon neutrality in their operations by 2030 and a reduction of their greenhouse gas emissions by at least 55% as compared to the baseline period of its operation. Due to the lack of available data for the early years of BEREC/BEREC Office operation the years 2016-2019 will be used as this baseline period.

This policy and the environmental management system shall be applied to all activities of BEREC and of the BEREC Office in Riga and will be revised periodically during review meetings of the BEREC Office MB or whenever this is necessary.



4. Environmental status-quo for BEREC and BEREC Office

The COVID pandemic changed dramatically the mode of operation for BEREC and for BEREC Office introducing online participation and teleworking as the main activities in the everyday work activities. For example, the BEREC WGs who used to have ~100 physical meetings every year before COVID prefer now to work remotely having more than 500 online meetings using the videoconference facility that BEREC Office has available (see the figure below). This has reduced the number of physical meetings by $\frac{3}{4}$ to ~25 meetings per year. In addition, the number of physical participants of these physical WGs meeting has also dramatically decreased because the experts and drafters tend to prefer participating online. However, an increase in the physical participation at CN and plenary meetings results in the GHG contributions to remain at the same level for the CN meetings and to increase for plenary meetings although the number of physical CNs and plenaries have been reduced to 3 meetings per year since 2022. An additional reason for the increase of the GHG contributions from the plenaries and CN meeting was the fact that in some cases the selected location of the meeting was not the best connected city of the hosting country and an additional local flight was necessary.

As air travel is the driving factor of the CO₂ contribution of BEREC and because other factors (e.g. resource consumption during meetings) are difficult to quantify and monitor, this document will mainly focus on the GHG contributed from the air-traveling for the BEREC meetings.

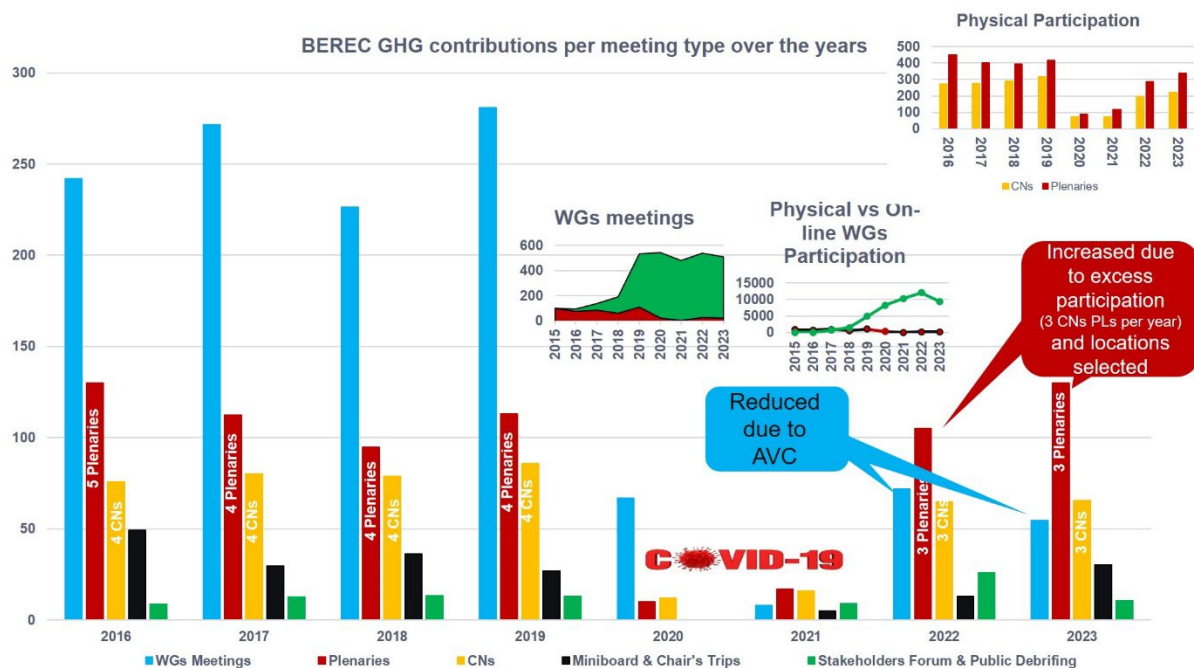


Figure 4: GHG contributions due to BEREC meetings over the years (tons)

For the BEREC Office the teleworking approach that was extended during the COVID years continued in 2022 with many staff members to be present at the office only 2 days per week. Such a working approach affected the need for electricity, heating and commuting and it has reduced the CO₂ footprint of the Agency. In addition, since 2023 a significant reduction in traveling was introduced at BEREC Office. The effects of both these changes are clearly shown in the following figure.

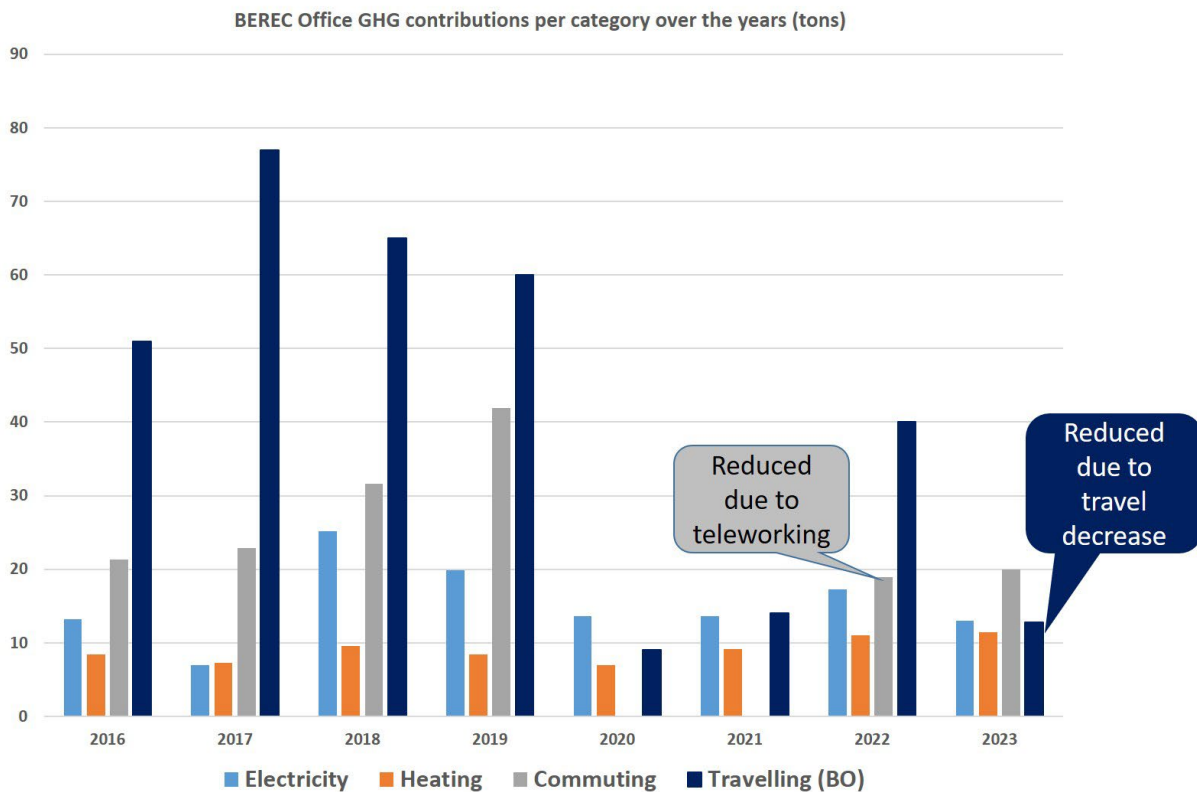


Figure 5: BEREC Office GHG contributions per category over the years (tons)

At this point it is worth to mention that although the online meetings have also an environmental footprint due to the consumption of electricity this is much lower compared to traveling and the other resources required for the physical participation. In [11] for example, it is estimated that an online meeting of the same duration contributes 7% of CO₂ contributed in meetings with physical participation while [12] states that transitioning from in-person to virtual conferencing can substantially reduce the carbon footprint by 94% and energy use by 90%. In [13] a holistic estimate is presented taking into account not just the effects of traveling but more generally all elements related to a big meeting. The document shows that a digital conference will on average reduce the carbon footprint by 90% versus a digital conference while according to [16] a digital conference contributes 2-3 degrees of magnitude less GHG as compared to a physical one (i.e. 1/100 to 1/1000). This reduction is mainly caused by less



printed material and no need for transport of participants to the venue or use of hotel accommodation, the catering, etc.

The year of 2022 was the first year of normal operation after the pandemic. Since this year all BEREC and BEREC Office activities were planned and executed without considering COVID as a factor. As it was explained above however the mode of operation of BEREC and of BEREC Office in the after-COVID era is dramatically different. For this reason the year of 2022 will be used in this report as the new status-quo in our CO₂ calculations. The following figure illustrates the CO₂ contributions due to air-travelling in 2022 for different BEREC meetings¹.

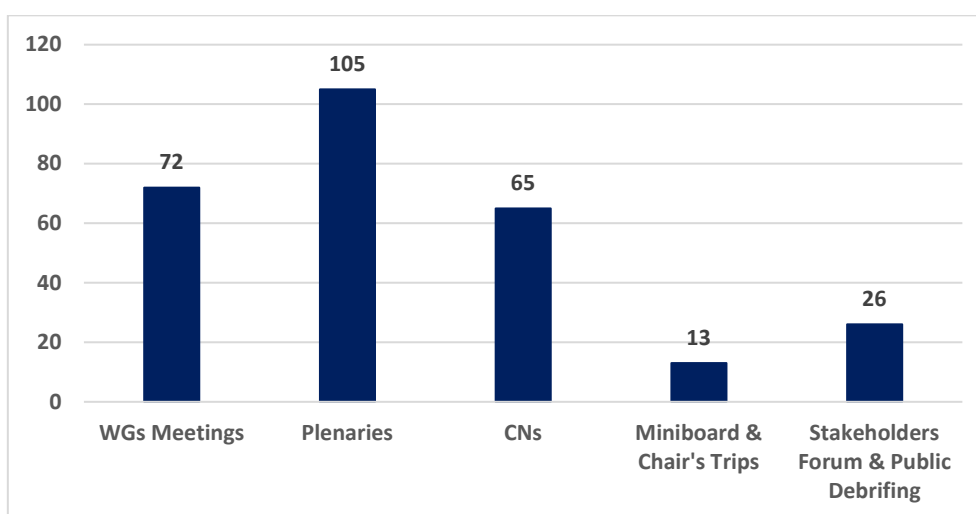


Figure 6: GHG contributions due to air travelling from the BEREC activities in 2022

Summarising all the contributions on the above picture, we can see that the **total BEREC CO₂ contribution due to air-traveling was ~281 tons in 2022** and that the plenary meetings is the major contributor followed by the WGs and the CNs meetings. In certain cases however, WGs meetings are organised on the side of CNs or plenary meetings and this may offer a reduction in travelling for the WGs co-Chairs or for some of the participants who participate in both meetings. To exploit this positive synergy effect more extensively in the future, the current Handbook for BEREC Working Groups co-Chairs (MB(23)16) that govern the operation of the BEREC WGs (and specify Brussels and Riga as main meeting locations) should be amended in the first opportunity given. Additionally, every effort should be given to combine also other

¹ In this GAP the ICAO calculator has been used for estimating the CO₂ contributions. <https://www.icao.int/environmental-protection/CarbonOffset/Pages/default.aspx>. This approach requires as inputs the start and end points of an air-journey and the ticket class of the passenger. For the calculations that have been done for this GAP **all physical participants of meetings have been taken into account** (both the ones whose traveling expenses are reimbursed by BO and the ones whose expenses are not reimbursed). For the ones reimbursed, the travel itinerary used in the ICAO calculator is the one that is reimbursed by BO. For the ones who are not reimbursed, the shortest flight combination between the location of the NRA premises and the location of the meeting is used.

meetings whenever possible like for example the Stakeholders Forum with the first plenary meeting in Brussels.

Considering now that there were 3 physical plenary meetings in 2022 with 311 physical participants the average CO₂ contribution per plenary meetings is 35 tons and per plenary participant is 338 kg. Similarly, on average 24 tons of CO₂ was contributed for each CN meeting or 301 kg of CO₂ per CN participant in 2022. Finally, in the case of the 27 WGs meetings in 2022 the CO₂ contribution per meeting is 2.7 tons per WG meeting or 300 kg per WG meeting participant.

Table 1: Average CO₂ contributions per meeting and per meeting participant

| Meeting type | Meeting method | Average CO ₂ contributions per meeting due to ALL meeting participants | Average CO ₂ contributions per meeting due to physical meeting participants | Average CO ₂ contributions per physical meeting participant (kg) | Average CO ₂ contributions per meeting due to on-line meeting participants (kg) | Average CO ₂ contributions per on-line meeting participant ² (kg) |
|------------------|----------------|---|--|---|--|---|
| Plenaries | Hybrid | ~35.1 tons | 35 tons | 33 | 92 | 3.38 |
| | Online | 395 kg | | | 395 | 3.38 |
| Contact Networks | Hybrid | ~24.1 tons | 24 tons | 300 | 72 | 3 |
| | Online | 320 kg | | 320 | 72 | 3 |
| Working Groups | Hybrid | ~2.7 tons | 2.7 tons | 300 | 33 | 3 |
| | Online | 57 kg | | | 57 | 3 |

In an effort to estimate the Green House Gas (GHG) contributions of BEREC Office we have focused on the electricity and gas consumption of the Agency as well as the traveling of the staff (i.e. commuting and air traveling due to missions). The picture below shows the direct and indirect GHG emissions of BEREC Office in 2022.

² There is no doubt that online meetings also impact the environment through the increase use of electricity. However as it is state in [16] the CO₂ contributions of the digital participation is of the order of 1/100 to 1/1000 of this of the physical participation [16].

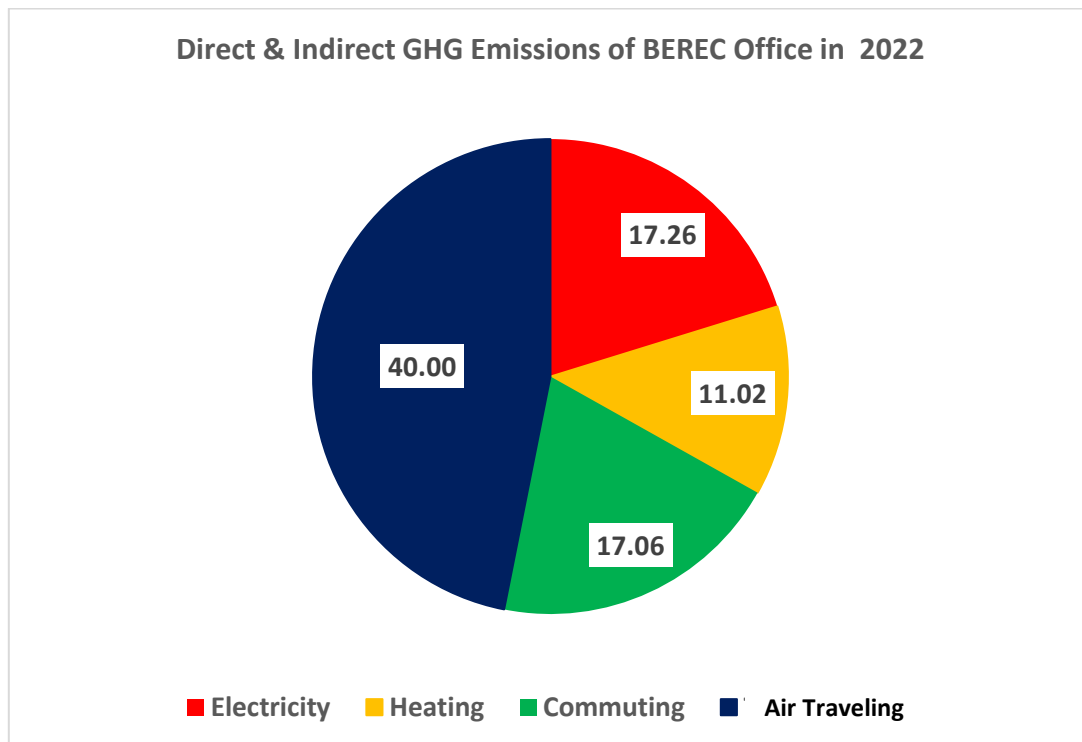


Figure 7: GHG emission of BEREK Office in 2022 (tons)

We can see on this picture that the total BEREK Office CO₂ contributions were **85.34 tons in 2022** with traveling to be the major contributor. For the above calculations it has been taken into account the electricity and gas consumptions of BEREK Office in 2022 for an Office size of 1574 m² without the basement and the garages (or ~54.2 kg of CO₂ per m² per year for electricity and heating) for 54 staff members (or 316 kg of CO₂ per staff member per year due to commuting assuming that all BEREK Office staff follow a 3-days per week³ teleworking rule). It is also important to point out that other factors (e.g. resource consumption during meetings) are difficult to quantify and monitor and for this reason are not taken into account on this plan.

It can be derived from the above that **the critical parameter for the environmental footprint of BEREK is the direct GHG contributions due to air travel** of the people who go to physical meeting while for **BEREK Office the critical parameters for its environmental footprint are both the direct GHG contributions from the air travel of the staff and the size that the office occupies** which determines the electricity and gas consumption as well as the presence of staff at the office which influences their commuting behaviour.

³ The staff of BEREK Office are allowed to telework 3-days per week. However, this level of teleworking is on a voluntary basis and some staff members use to come to the office much more often. The figures about the CO₂ related to commuting assume that this teleworking rule (3-days per week) is used by all staff members.

5. Targets, Goals and Commitments

Currently, the BEREC Office estimates the CO₂ contributions due to the operation of BEREC and of the Agency on an annual basis. The Sustainability ENG presents the estimates of the previous year's activities at the first plenary of each year while the CO₂ contributions of BEREC Office are reported in the annual Consolidated Annual Activity Report (CAAR).

Aiming for an overall target to achieve climate neutrality in the BEREC and BEREC Office operation by 2030, the measurement process should continue in the years 2024 and 2025 with more detailed measurement and GHG reporting. This would allow to set realistic targets in the new BEREC strategy 2026-2030 and in the BEREC Office Single Programming Document 2026-2028 establishing a commitment for GHG reduction and a glide-path for achieving GHG neutrality in our operation by 2030.

Methodology for setting targets

This Greening Action Plan for BEREC and the BEREC Office intends to follow GHG reduction approach as in the EU's Green Deal 2030 climate and energy framework which requires a 55% reduction in the GHG contributions by 2030 as compared to the levels of 1990. However, since the BEREC operation started in 2010, the total BEREC and BO GHG contributions must be firstly calculated and averaged for a number of years. Unfortunately, no data are available for the period 2010-2015. For this reason we will limit our work on averaging for the period prior to COVID operation from 2016 to 2019 for which we have data for calculating the average CO₂ contributions for BEREC and for BEREC Office.

Not taking into account the period of the COVID pandemic in the operation of BEREC and of BEREC Office, the total average is estimated at 613 tons of CO₂. Although the operation of BEREC and of BEREC Office could be treated as a whole, more clarity is offered if the GHG contribution from the operation of BEREC and of BEREC Office are separated. This is because the critical parameters that affect the GHG contributions are different in the two cases and the actions that should be applied for the improvement of the environmental footprints significantly differ. For the operation of BEREC, this average is estimated at 496 tons of CO₂ for BEREC (Figure 8)⁴. If this level is reduced by 55% as the basic principle in the 2030 climate and energy framework dictate **the GHG level for BEREC by 2030 should be limited to 223 tons or less**. By comparing this GHG level with the year of the status-quo operation after COVID (2022) it becomes clear that the post-pandemic operation of BEREC is above this level and a further reduction by ~60 tons of CO₂ is needed. The situation was worse in 2023 since **a reduction of ~70 tons is needed to achieve the target of the 2030 climate and energy framework**.

⁴ This number is further reduced to 202 tons of CO₂ if the year with the less GHG contributions (i.e. 2018) is selected as a base. In such a case more dramatic reduction will be needed for the GHG contributions of BEREC (i.e. ~90 tons as compared to the GHG contributions of 2023).

Similarly, for BEREK Office the average is estimated at 117 tons of CO₂ for BEREK (Figure 9). If this level is reduced by 55% as the basic principle in the 2030 climate and energy framework dictate, **the GHG level for BEREK Office by 2030 should be limited to 53 tons or less**. For the BEREK Office the GHG on the status-quo year (2022) are above the target level by 34 tons of CO₂. However, the introduction of teleworking and the reduction of air-traveling introduced in 2023 had as a result the target of 53 tons to be almost achieved. In addition, the reduction of the office space of the Agency (the 3.5 floor) since the beginning of 2024 will have an effect of the electricity and gas consumption making the target set for BEREK Office achievable already this year.

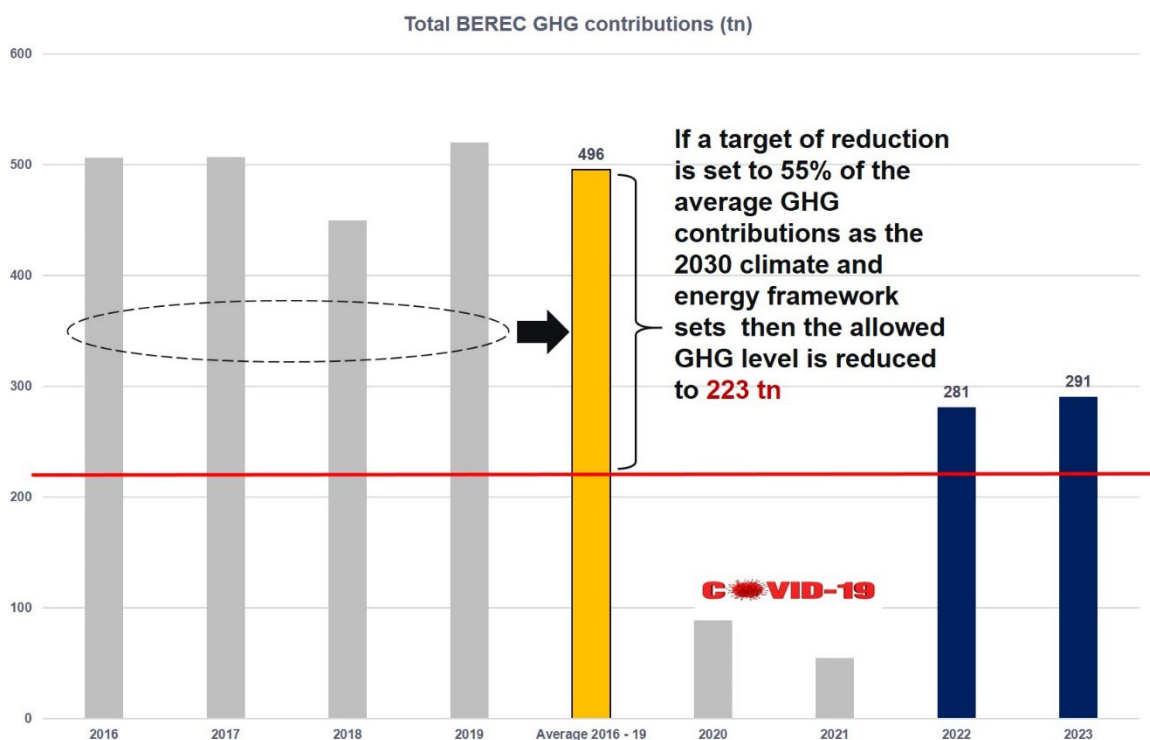


Figure 8: BEREK GHG contributions over the years (tn)

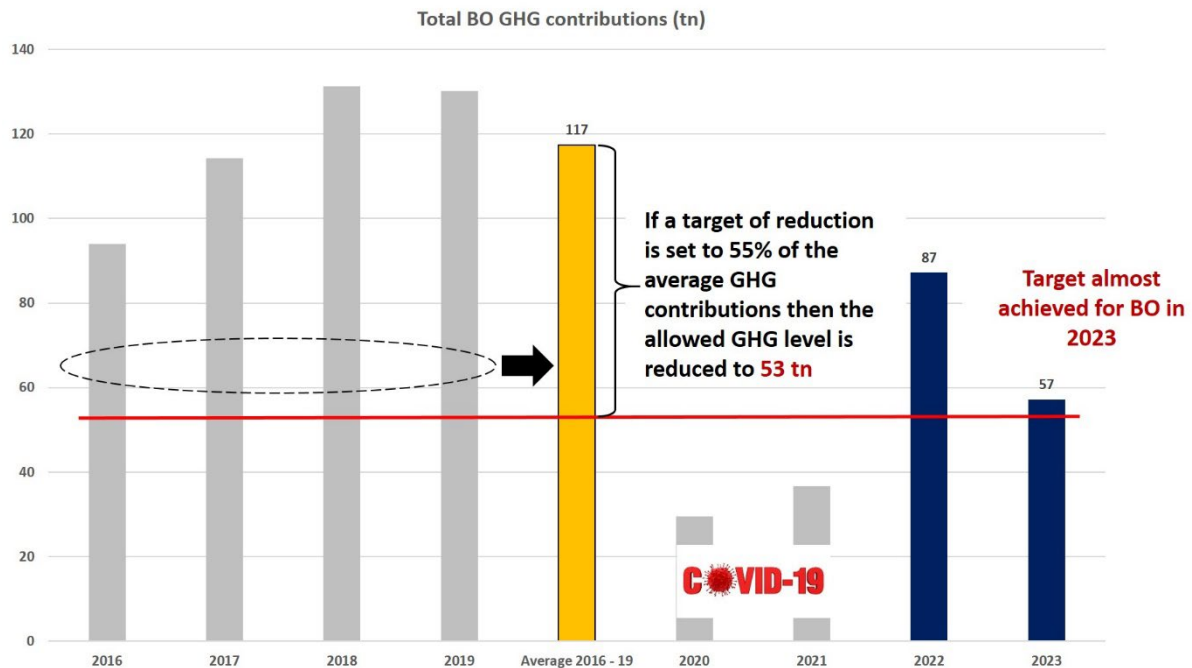


Figure 9: BEREC Office GHG contributions over the years

Although there will be some implications on the BEREC Office budget, it is also important to consider that any mitigation actions for achieving the above mentioned GHG targets could also be combined with carbon removal of the residual CO₂ contribution of BEREC and the BEREC Office. Currently, the cost of offsetting is relatively low (i.e. ~40€ / ton in 2023 [10]).

This would impact the budget of BEREC Office by less than 3500€ for offsetting the remaining 86 tons of CO₂ needed for BEREC to achieve its GHG target in 2023. Furthermore, if the total GHG contributions of both BEREC and BEREC Office are offset the estimated cost will be less than 15000€. **This would allow BEREC and of BEREC Office to become carbon neutral already from 2023.**

This cost of offsetting however, is expected to be increased significantly in the future. Therefore, carbon offsetting should only be used as an auxiliary measure in addition to measures that aim to reduce the GHG footprint.

Indicative environmental KPIs to be used

Further to the measurements of the GHG contributions that BEREC Office is performing on an annual basis the following Key-Performance-Indicators (KPIs) are proposed for an easy comparison of the performance progress. These will be further elaborated during the EMAS certification process.

Indicative KPIs for BEREC:

- **Total CO₂ contributed per CN and plenary meeting.** This depends on both the location where the meetings takes place and the number of physical participants.

The aim should be that these levels are reduced on an annual level so the CO₂ contributed by a CN or plenary meeting should be less of the amount contributed from the same type of meetings the previous year.

Indicative KPIs for BEREC Office:

- **Number of BEREC Office missions.** The aim will be to reduce the CO₂ contributions due to missions every year by reducing the number of missions.
- **KWh of electricity and m³ of gas consumed every year.** These levels should be reduced every year and be replaced, as much as possible, by energy from renewable sources.



6. Proposed actions

6.1.1. Travelling and Meetings

By setting the targets of the EC 2030 Climate and Energy Framework as the objective for the future BEREC and BEREC Office operation, the critical parameters for reducing GHG emissions described in Section 4 above should be considered as a priority and the following actions could be used⁵. It would be more effective if the main actions described on the following table are used in combination with each other as well as with the ones included further down in this section.

Table 2: Action areas considered

| Area of actions | Effect on GHG contributions | Alternative | Action to be taken by | Timing |
|--|---|--|---|--|
| <p>1) Reduce the physical participation in meetings</p> <p>(e.g. 1 physical participant per NRA to CNs and 2 for the NRAs members of the mini-Board, 2 physical participants per NRA on plenaries and 3 for the NRAs members of the mini-Board).</p> | Potential saving of ~70 tn of CO ₂ per year; | <p>Offsetting GHG</p> <p>(cost ~3000€ per year)⁶</p> | Incoming BEREC Chair, Host NRAs and participating NRAs ⁷ | In 2024 to be applied in 2025 |
| <p>2) Limit the locations of CNs and plenary meetings to places with good air-connection</p> <p>(i.e. All NRAs should be able to host meetings but no meetings should be done in places that require additional local flights in order to be reached).</p> | | <p>Offsetting GHG</p> | Incoming BEREC Chair and Host NRAs | Early in 2024 to be taken into account for the selection of the meeting locations for 2025 |

⁵ The reduction of the GHG emissions is just the starting point. Other environmental dimensions (e.g. reduction of the water and energy consumption) will be considered in the future when data will be available.

⁶ Based on 2023 offsetting prices of 40€ per ton of CO₂.

⁷ Host NRA, when sends out the invitation to the meeting participants, should include three elements in the information material: 1) what they do, as host, to make the meeting as green as possible, 2) an advice to the delegations to minimize the environment footprint by reducing their size of the delegation, 3) an advice the participating delegations to choose a direct flight, whenever existing one, even if it means using a low cost company

| | | | | |
|---|--|--|------------------------|--|
| 3) Reduction of the number of CNs and Plenary meetings (e.g. 2 CNs/Plenaries per year in hybrid mode and 2 ones fully on-line). | Potential saving of ~60 tn of CO ₂ per year; | Offsetting GHG (cost ~2500€ per year) ⁸ | BEREC BoR ⁹ | To be taken only if it is absolutely necessary and only after implementing first the Actions-1 & 2 |
| 4) Promote the use of the current teleworking rule (3 days per week), apply hot-desking and abandon part of the office space. | Potential saving of ~25 tons of CO ₂ per year (teleworking) and ~10 tons (abandoning the floors 1a and 3.5) | Offsetting GHG (cost ~1500€ per year) ⁶ | BEREC Office Director | In 2024 to be applied in 2024 |

It must be clearly pointed out that although CO₂ offsetting and the offsetting cost is given as an alternative in Table-2 above for comparison reasons, reducing emissions remains the first choice. Carbon removals should be kept as a necessary measure to achieve carbon neutrality by offsetting unavoidable, residual emissions. The overall aim, however, should be to reduce carbon emissions to the greatest extent possible to achieve the set targets.

There is no doubt that online meetings also impact the environment through the increase use of electricity. Based on the CO₂ contributions on online participants presented in Table-1, the online participation in plenary meetings and in CN meetings increases the CO₂ contributions by 1.5% and 2%. This can be considered as negligible and not taken into account in our calculations. For WGs meetings though, this increase is of the order of ~15% due to the high online participation of experts. This increase cannot be ignored. Therefore, in this document the average CO₂ contributions per WG meeting that will be taken into account in the calculations will be 3 tons of CO₂ as the Table-1 indicates.

BEREC/BO has since 2022 set limits on the number of physical WG meetings to around 30 meetings annually (the real number of meetings for 2022 and 2023 was even lower, i.e. 26 and 21 respectively as compared to more than 100 physical WGs meetings pre-pandemic). On top of that, the number of the physical CN and Plenary meetings has been reduced to 3+3 per year since 2021. In line with that, the number of public debriefings in Brussels has also been reduced. Further actions to make meetings more sustainable may include:

⁸ Based on the offsetting prices of 2023 (i.e. 40€ per ton of CO₂).

⁹ Similar to the way the reduction of physical CNs and plenary meetings from 4 to 3 from 2022 was decided at PL1-2021 after the suggestion of the High level BEREC workshop (30 Sep. 2020) to reduce number of physical meetings (see documents at Z:\BEREC\Plenary Meetings\2020\PM3-Dublin\Workshop).

A) Actions for BEREC

1. Select meeting location with less environmental impact and keep the number of physical participants on the minimum necessary level

Physical meetings are essential for the operation of BEREC as they are enablers that bring great value to the work produced. Therefore, the greening actions shall primarily focus on how to make them environmental friendly, and not on how to avoid them.

As an indicative example, it can be derived that if only 1 physical meeting of each WG per year takes place there will be a 40 tons of CO₂ reduction per year. If less (e.g. 2) physical CNs and plenary meetings take place, there will be a ~60 tons of CO₂ reduction per year.

Prior to the selection of the meetings locations, estimate the GHG emissions to get to a meeting location and avoid locations that will add up a significant contribution of CO₂ like the ones which are very remote and require additional local flights for most of the participants. These actions do not reduce the number of meetings or the number of participants and have no cost implications.

Action identified:

| No. | Action | Actor | Timeline |
|-----|---|---|--|
| 01 | Select meeting locations for Plenary and CN meetings with high consideration to the environmental impact | Incoming BEREC Chair and volunteering meeting host NRAs | As of the preparation of the meeting calendar for 2025 |
| 02 | Amend the Handbook for BEREC Working Groups co-Chairs (MB(23)16) so the regular meeting location is extended beyond Brussels and Riga providing that the hosting NRA offers meeting room facilities with videoconference and catering | BEREC Chair | When the next amendment of the handbook takes place |

The figure below shows indicative CO₂ contributions per person for different meeting location in Europe and beyond. It is clearly shown that when a meeting takes place to a location that requires an additional local flight to be reached, the CO₂ contributions are increased. Therefore, such locations should be avoided. Cities in central Europe, including Brussels, which have good connection by air and train are the ideal locations for a meeting from the environmental point of view.

Environmental impact of meeting locations

Calculation of the CO₂ contributions due to traveling for meetings in different locations

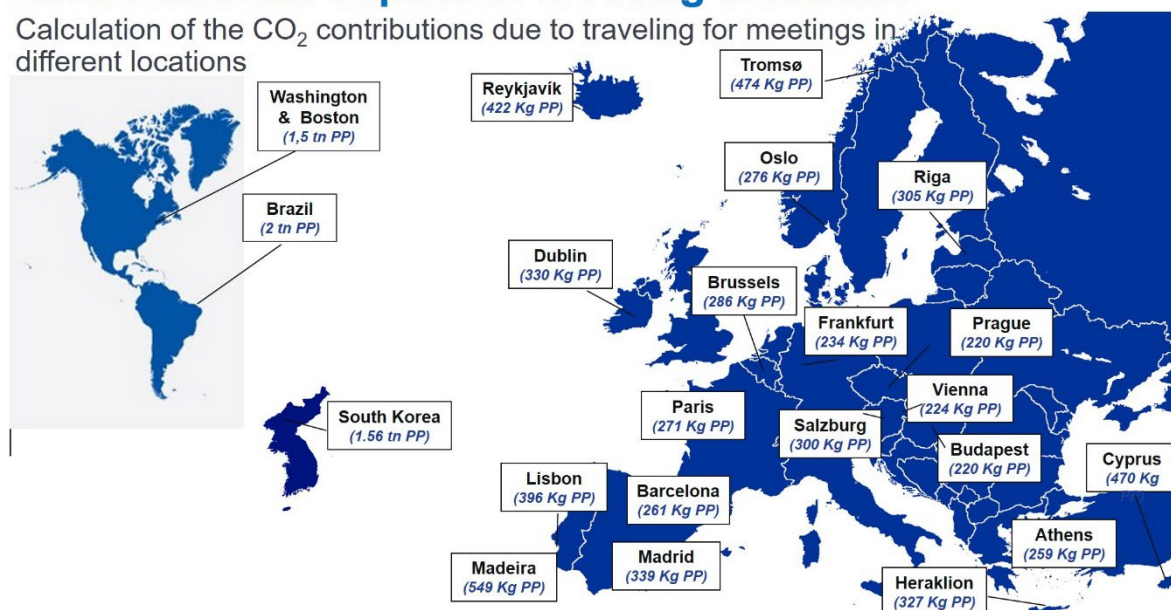


Figure 10: Environmental impact of meeting locations

As a complementary action, the host NRAs, when sends out the invitation to the meeting participants, should include two elements in the information material: 1) what they do, as host, to make the meeting as green as possible, 2) an advice to the participating delegations to minimize the environment footprint, for example by limiting the size of their delegations. The advice could also include promoting travel by trains whenever this is possible and 3) an advice the participating delegations to choose a direct flight, whenever existing one, even if it means using a low cost company.

Regarding the size of participating delegations of the NRAs in CNs and plenary meetings there are currently the following statistics based of the meetings in 2023.

Table 3: Size of NRAs delegations¹⁰

| | Average size of NRA delegation | Minimum size of NRA delegation | Maximum size of NRA delegation |
|-------------------------|--------------------------------|--------------------------------|--------------------------------|
| CN meetings | 2.2 | 1 | 5 |
| Plenary meetings | 2.7 | 1 | 4.6 |

Action identified:

¹⁰ Excluding the host NRA

| No. | Action | Actor | Timeline |
|-----|--|--------------------------------|---------------------------------------|
| 03 | Include a 'Sustainability' chapter in the invitation package to each Plenary and CN physical meeting | Volunteering meeting host NRAs | As of the adoption of the action plan |

2. Calculate the GHG contributions and offset the CO₂ produced by each meeting.

These action does not reduce the number of meetings or the number of participants but it has budget implications due to the cost of offsetting (i.e. offsetting cost in 2023 ~40 EUR per ton of CO₂ but this is expected to increase considerably in the future).

Action identified:

| No. | Action | Actor | Timeline |
|-----|---|----------|---------------------------------------|
| 04 | Calculate, report and analyze the GHG contributions for each meetings | Director | As of the annual reports on year 2024 |

B) Actions for the BEREC Office

6.1.2. Presence at the office

To keep the GHG emission on the minimum necessary level, the BEREC Office should promote using the teleworking opportunities provided by the working time regime. Physical meeting participation should also be limited to the minimum necessary level. Moreover, application of a flexible working environment should be continued with "hot desk" solution and the Agency should give incentives to the employees so that they use electric cars or bicycles to commute to/from the office.

Additionally, a non-exhaustive list of further actions at a practical level to reduce the environmental impact of meetings could also be include both for the meetings at BEREC Office and the BEREC with the aim to achieve a "*green meeting*" certification [14].

- Paperless Ares filing system and use of recycled paper;
- The building where the meeting will take place should maximize the use of daylight and should be managed in an energy-efficient manner;
- On-line registration and all communication related to a meeting should be made electronically;
- Avoid the distribution of gifts, promotional material, etc.;
- Adopt the 3Rs principle (Reduce, Reuse, Recycle) at the preparation of a meeting as well as during the meeting;

- Prefer a menu with a healthy and balanced diet, with moderate meat content and local organic and seasonal products. Drink tap water by choosing glass containers instead of disposable plastic bottles and paper cups. Prefer reusable dishes/cutlery and avoid single use disposable items;
- Determine the exact number of participants at the meeting to avoid food waste. In case of excess food, it should be given to support associations in need;
- Recommend accommodation for participants close to the meeting's venue that is easily accessible by public transport, cycling or walking;

Action identified:

| No. | Action | Actor | Timeline |
|-----|---|----------|---------------------------------------|
| 05 | Continue promoting teleworking, applying flexible working environment and implementing 'green operation' principles | Director | As of the adoption of the action plan |

6.1.3. Building

What the BO do already now:

- maximise the use of daylight and manage it in an energy-efficient way
- optimize the work environment by redesigning office buildings and space,
- introduce flexibility in the way office space is used on a daily basis by promoting teleworking and hot-desking (i.e. fewer working stations – less space needed),
- upgrade lighting and install light sensors, optimize heating by setting point temperatures, identify potential to install voltaic panels.

In the current building, the BO's possibilities are limited due to the fact that it occupies a historical building built in 1860, which is owned and managed by the Latvian Government. The current lease is running out at the end of the decade, however, it is possible that the BEREC Office might share new premises with the representations of the European Commission and the European Parliament from 2025 onwards. The lead for the selection of any building lies with the European Parliament, which has its own high selection criteria for sustainable and low-energy buildings. As a big uncertainty currently exists with this project, BEREC Office is not able to estimate the exact effect this move will have on its operation. Therefore, all the calculation related to the environmental footprint of the building the Agency of the agency are done based on the current premises.

Action identified:

| No. | Action | Actor | Timeline |
|-----|---|----------|---|
| 06 | Pay attention to applying environmental consideration in the 'new premises' project | Director | In accordance with the future premises project timeline |

6.1.4. IT

What the BO is already doing now:

- Improve/enforce helpdesk service to support teleworking/support of videoconferencing
- Develop IT tools to support teleworking (booking rooms, equipment, tools replace use of paper)
- Replace IT equipment with more energy efficient ones (energy certified equipment), use smaller multipurpose appliances to reduce the average energy consumption and associated toner waste, repair devices whenever possible, set minimum lifetimes for devices
- Introduce e-processes: e-procurement, e-tendering, e- approval of docs, processes related to publicity
- Redesign and clean existing databases
- Adopt a tool for monitoring-measuring impact of various internal -external processes

Action identified:

| No. | Action | Actor | Timeline |
|-----|--|----------|---------------------------------------|
| 07 | Further promote and apply greening principles in IT operations and report in the Consolidated Annual Activity Report | Director | As of the adoption of the Action Plan |

6.1.5. Improve recycling

What the BO is already doing now:

- Adopt a system of waste sorting, collection and recycling,
- Use recycled paper, purchase ecological/recycled items from office supply catalogue,
- Limit the printed documents per user. If it is really necessary to print documents, prefer eco-friendly printing, e.g. use recycled paper, print double sided, reduce the number of pages as much as possible,
- Promote the use and distribution of all documents electronically¹¹,
- Consider the use of refurbished and/or repairable devices.

Action identified:

| No. | Action | Actor | Timeline |
|-----|--|----------|---------------------------------------|
| 08 | Further promote and apply recycling principles and report in the Consolidated Annual Activity Report | Director | As of the adoption of the Action Plan |

¹¹ As the energy of storing digital information is increasing, an effort should be made to keep only what is necessary at the digital level.

6.1.6. Green Procurement

Green Public Procurement (GPP) is defined in the Communication (COM -2008- 400) [9] as *"a process whereby public authorities seek to **procure goods, services and works with a reduced environmental impact throughout their life cycle** when compared to goods, services and works with the same primary function that would otherwise be procured."*

The voluntary GPP Criteria cover a big variety of products in the groups indicating the technical specification of products in order to be considered as environmentally friendly:

- Computers, monitors, tablets and smartphones;
- Data centers, server rooms and cloud services;
- Electricity;
- Food catering services and vending machines;
- Furniture;
- Imaging equipment, consumables and print services;
- Indoor cleaning services;
- Office building design, construction and management;
- Paints, varnishes and road markings;
- Public space maintenance;
- Road design, construction and maintenance;
- Road lighting and traffic signals;
- Road transport;
- Textile products and services;

The BEREC Office Procurement Manual promotes the GPP and includes the relevant information for use by the actors in procurements procedures, as well as the relevant training toolkit.

Action identified:

| No. | Action | Actor | Timeline |
|-----|---|----------|---------------------------------------|
| 09 | Further promote and apply Green Public Procurement principles and report in the Consolidated Annual Activity Report | Director | As of the adoption of the Action Plan |

6.1.7. Carbon removals/offsetting

Currently, the BEREC Office is not procuring any carbon offsets for the GHG emissions caused by the operation of BEREC and the BEREC Office and which stem from business travels as well as heating and electricity consumption of the BO premises.

Carbon offsetting is a process in which individuals or organizations make efforts to reduce carbon emissions of specific activities such as a single flight or a portion of the carbon produced by a business in a certain period. A carbon offset program works by supporting initiatives that focus on reducing carbon emissions, increasing carbon storage, or both¹².

In 2022 the BEREC Office participated in the EUIPO's inter-institutional procurement for a framework contract that provides an opportunity for easily procuring consulting services on environmental management systems as well as the reduction and offsetting of greenhouse gas emissions. Such services might well be requested in the implementation phase of this Greening Action Plan.

Carbon removals is a frequently discussed topic within the EU institutions and agencies (see also 6.8.) and is also being addressed at the political level through the European Commission's proposed regulation for a 'Union certification framework for carbon removals', which is currently in the ordinary legislative procedure of EP and Council and due to be adopted in 2024 (Procedure: 2022/0394(COD)). This framework, if and once adopted, would establish a more robust and reliable certification scheme that would provide more legal certainty and help prevent greenwashing for any future procurement of carbon offsets.

It must be said that reducing emissions remains the first choice, but carbon removals will at some point be a necessary measure to achieve carbon neutrality by offsetting unavoidable, residual emissions. The overall aim, however, is to reduce carbon emissions to the greatest extent possible to achieve the set targets.

Action identified:

| No. | Action | Actor | Timeline |
|-----|---|----------|---|
| 10 | Consider carbon offsetting in justified cases | Director | As of preparing the final SPD 2025-2027 |

6.1.8. EMAS

The BEREC Office is committed to become EMAS certified during the years dedicated to this Greening Action Plan by following the lead of EU Institutions and several other EU Agencies that have already been registered, starting with the European Commission in 2005.

EMAS does not set minimum performance requirements, but rather gives a chance to every organization to implement the system that will make them improve their sustainability. The EMAS requirements [15] can be summarized as follows:

¹² Every effort should be given to prefer local offsetting programs over programs in other continents.

1. Conduct an environmental review - The organization itself must **identify its environmental impacts and obligations**.
2. Adopt an environmental policy - The organization has to set up an **action plan to decrease its environmental impacts**.
3. Establish an environmental management system - To achieve its objectives, the organization must **set up procedures to assess and control its environmental performance**.
4. Carry out an internal environmental audit - The organization must **regularly assess whether the procedures in place are in line with its objectives**.
5. Prepare an environmental statement - The organization needs to **provide a public statement of its environmental performance**. This includes compulsory indicators such as energy efficiency, material and water consumption, waste production and CO₂ emissions. It lays down the results achieved against the objectives and the future steps to be undertaken in order to continuously improve the organization's environmental performance.
6. Independent verification by an EMAS verifier - An **independent verifier audits the organization to ensure the reliability and trustworthiness of its environmental strategy**.
7. Registration by a Competent Body - As a final step, the organization **registers with the appropriate public authority in the Member State**.

This Greening Action Plan sets the basis for EMAS, however, in order to kick-start the process and to benefit from the experience of fellow agencies within the EU Agencies Network (EUAN), the BEREK Office is partnering in a so-called twinning exercise with the European Banking Authority, which has been registered under EMAS in 2022. This exchange of best practices will help speeding up the process and provide a more cost-effective solution than proceed to a procurement of external advisors.

Action identified:

| No. | Action | Actor | Timeline |
|-----|--|----------|---|
| 11 | Work towards becoming EMAS certified, include the target in the programming document | Director | As of preparing the final SPD 2025-2027 |



6.1.9. Training BEREC and BEREC Office on sustainability

The training curriculum for BEREC Office staff should include trainings on the basics of EMAS, which are already available in EU Learn, and be complemented by internal awareness sessions and joint activities, e.g. beach clean-ups, planting of trees, peatland restorations etc.

At the level of BEREC, the training curriculum for the NRAs' junior experts should also include elements of sustainability awareness.

Action identified:

| No. | Action | Actor | Timeline |
|-----|--|----------|------------|
| 12 | Include in the training of the junior experts of the NRAs material for environmental awareness | Director | As of 2024 |

6.1.10. Participation in the EUAN Greening Network and other joint EU initiatives

The BEREC Office, as a member of the EU Agencies Network (EUAN), is actively taking part in the activities of the EUAN's Greening Network (EUAN GN).

The purpose of the EUAN GN is to increase the efficiency of Agencies and JUs through sharing of services, best practices and pooling of tasks and capabilities in view of EU green, digital and resilience priorities.

At the moment, the BEREC Office is taking part in the so-called EMAS Twinning exchange, initiated by the EUAN GN, where already EMAS registered agencies assist other agencies that have only started the process.

Action identified:

| No. | Action | Actor | Timeline |
|-----|---|----------|--|
| 13 | Participate in the work of the EUAN on greening initiatives | Director | Continue as of the adoption of the action plan |



6.1.11. Best practice sharing

The network of the greening officers of the NRAs (for example within the BEREC Office ENG on Sustainability) should serve as a forum to share and disseminate best practices among NRAs and in collaboration with other EU bodies and institutions.

Actions identified:

| No. | Action | Actor | Timeline |
|-----|--|----------|---------------------------------------|
| 14 | Preparation of a regularly updated compendium with best practices among the NRAs | Director | As of the adoption of the Action Plan |

7. Monitoring of the implementation of actions, communication and reporting

BEREC/BO follows a communications plan to inform staff and stakeholders about the agency's environmental performance based on its objectives as well as on the consumption/generation of energy, waste, emissions, and other topics of interest.

The communication plan will be jointly developed (and updated annually) with the BEREC ENG Communication and in coordination with the EUAN Greening Network.

Guiding principles for communication actions shall be

- Ensure coherent and regular reporting on efforts towards more sustainability;
- Monitor the activities of the other EUAN subnetworks in the field of sustainable development and collaborate with them for alignment of actions;
- Build a common narrative with other EU agencies to promote the EUAN's efforts in greening the EU Agencies/institutions, including participation in an EU-wide green communication plan;
- Avoiding any form of greenwashing¹³;
- Follow internationally recognized standards on sustainability reporting.

BEREC/BO's progress in achieving its environmental objectives will be documented and communicated to staff and stakeholders (e.g. via BEREC/BO's website and social media channels).

¹³ Greenwashing is when an organization spends more time or money on advertising itself as environmentally friendly than on actually minimizing its environmental impact.

BEREC/BO's formal reporting documents (Annual Report, CAAR) are aimed at external stakeholders and include environmental information which provides an overview of the state of play of meeting our environmental objectives and the success in reaching our targets.

Beyond that, BEREC/BO is following the work of the EUAN's Working Group on Sustainability Reporting and intends to make use of any guidance from that group.

Action identified:

| No. | Action | Actor | Timeline |
|-----|--|----------|----------------------------|
| 15 | Include chapters on environmental consideration in the annual activity reports | Director | As of reports on year 2023 |



8. List of actions identified

| No. | Action | Actor | Timeline |
|-----|---|---|---|
| 01 | Select meeting locations for Plenary and CN meetings with high consideration to the environmental impact | Incoming BEREK Chair and volunteering meeting host NRAs | As of the preparation of the meeting calendar for 2025 |
| 02 | Amend the Handbook for BEREK Working Groups co-Chairs (MB(23)16) so the regular meeting location is extended beyond Brussels and Riga providing that the hosting NRA offers meeting room facilities with videoconference and catering | BEREK Chair | When the next amendment of the handbook takes place |
| 03 | Include a 'Sustainability' chapter in the invitation package to each Plenary and CN physical meeting | Volunteering meeting host NRAs | As of the adoption of the action plan |
| 04 | Calculate, report and analyze the GHG contributions for each meetings | Director | As of the annual reports on year 2024 |
| 05 | Continue promoting teleworking, applying flexible working environment and implementing 'green operation' principles | Director | As of the adoption of the action plan |
| 06 | Pay attention to applying environmental consideration in the 'new premises' project | Director | In accordance with the future premises project timeline |
| 07 | Further promote and apply greening principles in IT operations and report in the Consolidated Annual Activity Report | Director | As of the adoption of the Action Plan |
| 08 | Further promote and apply recycling principles and report in the Consolidated Annual Activity Report | Director | As of the adoption of the Action Plan |
| 09 | Further promote and apply Green Public Procurement principles and report in the Consolidated Annual Activity Report | Director | As of the adoption of the Action Plan |
| 10 | Consider carbon offsetting in justified cases | Director | As of preparing the final SPD 2025-2027 |
| 11 | Work towards becoming EMAS certified, include the target in the programming document | Director | As of preparing the final SPD 2025-2027 |
| 12 | Include in the training of the junior experts of the NRAs material for environmental awareness | Director | As of 2024 |
| 13 | Participate in the work of the EUAN on greening initiatives | Director | Continue as of the adoption of the action plan |

| | | | |
|----|--|----------------------|---------------------------------------|
| 14 | Preparation of a regularly updated compendium with best practices among the NRAs | Director | As of the adoption of the Action Plan |
| 15 | Include chapters on environmental consideration in the annual activity reports | Director | As of reports on year 2023 |
| 16 | Review the GAP in two years' time | co-Chairs of SUS ENG | In 2026 |



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