VANTAGE TOWERS

Public consultation on Draft BEREC Work Programme 2026 Feedback from Vantage Towers

Vantage Towers AG is one of Europe's largest and most geographically diversified tower companies (TowerCos), with over 86,000 sites across 10 countries. The company is headquartered in Germany.

Vantage Towers operates the passive infrastructure of mobile and other radio networks such as ground-based and rooftop towers for 4G and 5G networks. By renting space on its towers to mobile and other operators, Vantage Towers is pursuing an infrastructure-sharing model which lowers investment requirements, thereby easing the roll-out of mobile networks, including in rural areas and for transport corridors while fostering competition and having a positive impact on sustainability.

Vantage Towers, a key stakeholder in the deployment of mobile telecommunications towers across Europe, would like to thank BEREC for the opportunity to contribute to this important public consultation on its Draft Work Programme for 2026. As a pan-European tower company, we play a pivotal role in deploying and operating the passive infrastructure that supports mobile networks, enabling connectivity for millions of European end-users.

Each year, Vantage Towers massively invest in the deployment of mobile networks across our European markets, enabling high-quality and reliable connectivity to reach urban, suburban, and rural areas alike. Our input is aimed at contributing to shape a regulatory environment that fosters robust and widespread connectivity. We hope that our suggestions and insights on specific programme items will support BEREC in ensuring that European citizens and businesses alike can benefit from enhanced network coverage, security, and quality, which are essential components of Europe's digital transformation.

We support BEREC's 2026 strategic priorities, Promoting full connectivity, Empowering end-users, and Contributing to environmentally sustainable, secure and resilient digital infrastructures, and in particular its focus on implementing the Gigabit Infrastructure Act (GIA) and preparing for the upcoming Digital Networks Act (DNA). **We highlight below several areas where BEREC's 2026 Work Programme could be further strengthened to address key practical enablers of connectivity, focusing on electromagnetic-field management, access to energy and permitting, fair land practices, and small-cell deployment.**

Electromagnetic fields: enabling competition in the face of scarcity

- **Efficient implementation of EMF limits to support connectivity goals**

In our submission to BEREC's call for input, we suggested a project examining how the implementation of electromagnetic field (EMF) limits affects competition and infrastructure sharing. This topic remains of crucial importance to achieving the objective of promoting full connectivity under BEREC's Strategic Priority 1, **and we would encourage BEREC to consider addressing it in the final Work Programme for 2026.**

- **Integrating EMF considerations into ongoing BEREC workstreams**

While the draft work programme includes valuable initiatives on sustainability and network sharing, notably under Section 4.1 "Environmental data collection and Code of Conduct for ECN/ECS sustainability", Section 4.3 "Understanding digital technologies' sufficiency for greener networks", and Section 8.4 "Exchange of best practices on environmental impact assessment of

mobile network sharing", **these sections could usefully be expanded to incorporate the issue of measurements of EMF limits and transparency of EMF data as a barrier to site sharing and network densification.**

- **Promoting efficient use of EMF budgets within existing limits**

For health and safety purposes, national laws establish strict limits on the electromagnetic fields emitted by mobile radio antennas, which we fully support. However, in many Member States these limits are applied using theoretical maximum power assumptions rather than real-time or measured data. **This approach can lead to an overly conservative allocation of the EMF "budget," meaning that while actual emissions remain far below safety thresholds** (often one hundred and fifty to two hundred times lower[1]), **available capacity is deemed exhausted on paper.** As a result, co-location of multiple operators can become technically unfeasible particularly in dense urban areas where new sites are difficult to obtain, even when it would remain compliant with the established safety limits.

- **Encouraging BEREC to facilitate best practices**

Vantage Towers believes that this situation warrants focused attention from BEREC. We suggest that BEREC consider an analytical exercise or workshop under its environmental and sustainability workstreams to:

- Study national EMF assessment methodologies
- Identify how different approaches impact infrastructure sharing and network rollout
- Explore best practices for optimising spectrum and power use within existing EMF limits
- Examine mechanisms to improve cooperation between operators and competent authorities in the application and oversight of EMF compliance frameworks.

In particular, such work could also assess the potential benefits of voluntary power coordination among operators, greater transparency on EMF data for relevant stakeholders, and dispute-resolution mechanisms through competent national authorities in cases where the regulatory framework leads to inefficiencies. Over time, these findings could support the development of BEREC guidelines promoting proportionate and data-driven EMF management.

Call to action
We encourage BEREC to **include a dedicated activity in its 2026 Work Programme aimed at promoting efficient, harmonised, and data-driven EMF management practices within the current exposure limits**. This would help ensure that EMF compliance continues to safeguard public health while also enabling more infrastructure sharing and thus competition between MNOs, in turn supporting the EU's full connectivity and sustainability objectives.

Addressing energy access bottlenecks to power Europe's connectivity

- **Energy access as a prerequisite for full connectivity**

The second proposal submitted by Vantage Towers during the call for input concerned the availability and timeliness of power grid connections for new mobile tower sites. This remains one of the most persistent barriers to achieving Europe's connectivity targets and is directly relevant to BEREC's work on implementing the Gigabit Infrastructure Act.

Although the Draft Work Programme 2026, particularly Section 1.8 "BEREC contribution to EC Guidelines on Access to existing physical infrastructure according to Article 3 GIA" and Section 4.3 "Understanding digital technologies' sufficiency for greener networks", addresses access to existing infrastructure and environmental sustainability, it does not yet explicitly include energy access as a critical enabling factor. Yet, **electricity is the essential input powering mobile**

[1] Aerts, S.; Deprez, K.; Colombi, D.; Van den Bossche, M.; Verloock, L.; Martens, L.; Törnevik, C.; Joseph, W. "In Situ Assessment of 5G NR Massive MIMO Base Station Exposure in a Commercial Network in Bern, Switzerland". Applied Sciences 2021, 11, 3592, (link).

networks, and without timely grid connections, the pace of digital infrastructure deployment is severely constrained.

- **Power connection delays as a structural deployment barrier**

Even when all permits are in place, towers cannot be activated without a power connection. In several Member States, we have experienced that obtaining such connections can take **up to two and a half years**, mainly due to limited coordination between telecommunications operators and distribution system operators (DSOs), complex administrative procedures, and capacity constraints in local grids. In rural or remote areas, high connection costs further deter timely rollout.

These bottlenecks mean that TowerCos, whose business model is built precisely to accelerate and optimise infrastructure deployment, cannot fully leverage their potential to support the EU's connectivity and 5G targets. **As a result, valuable capital and operational efficiency remain underutilised, and Europe's progress toward its Digital Decade objectives is unnecessarily slowed.**

- **Strengthening cooperation between telecom and energy sectors**

As explained above, access to energy and related permitting procedures remain among the most critical bottlenecks to timely infrastructure deployment. These challenges are the result of fragmented local permitting systems, where telecommunications projects are rarely coordinated with energy network planning or upgrades. Addressing this situation **requires stronger cross-sector cooperation and coherent guidance between telecom and energy regulators. BEREC is uniquely positioned to highlight this interdependence in its work on GIA implementation and to promote best practices for coordination at national level,** ensuring that energy and telecom infrastructure development are planned in parallel.

- **Integrating energy resilience into network sustainability**

Finally, reliable energy access is not only a question of deployment speed but also of network resilience. Power outages or prolonged blackouts can severely disrupt mobile connectivity, which provides critical communication services during emergencies. **We would therefore strongly recommend that BEREC integrates the topic of energy resilience into its broader work on sustainability and network security,** recognising that a stable and reliable power supply is a cornerstone of resilient and secure electronic communications infrastructure.

Call to Action
We encourage BEREC to **explicitly integrate energy access and resilience into its 2026 Work Programme**, under both the Gigabit Infrastructure Act implementation and sustainability workstreams. In particular, BEREC could: • Conduct analytical work on the impact of power connection delays on mobile network deployment • Facilitate best practice exchanges between telecom and energy regulators to improve coordination and reduce connection timelines • Incorporate energy resilience considerations into its work on network sustainability and reliability.
By doing so, BEREC would help ensure that **access to the electricity grid no longer constrains Europe's digital rollout capacity**, allowing TowerCos to fully deploy their infrastructure potential and enabling faster, greener, and more resilient connectivity across the EU.

Addressing access to land and lease aggregation practices

- **Including infrastructure market dynamics in BEREC's competition analysis**

Vantage Towers notes with interest the inclusion of the "Fact-finding report on competition indicators and regulatory highlights in different jurisdictions" under Section 1.2 of the Draft Work

Programme. We would strongly encourage BEREC to ensure that this work examines not only service-level competition, but also infrastructure market dynamics, including access to land and lease aggregation. These factors directly influence the cost and speed of mobile network deployment.

- **The impact of lease aggregation on tower deployment**

In recent years, new intermediaries have emerged acquiring surface or usufruct rights over tower sites, some of them engaging in speculative lease aggregation. These aggressive actors often exploit the lock-in position of infrastructure operators, demanding disproportionate rent increases despite existing contractual indexation. Once a tower hosts several networks, relocation is technically and economically unfeasible, with dismantling costs exceeding half a million euros per site and entailing significant service disruptions for end-users. Such aggressive practices inflate costs, reduce investment predictability, and ultimately limit the deployment capacity of TowerCos, slowing network densification and rural rollout.

- **Towards proportionate and sustainable access to land**

Vantage Towers believes that this issue merits explicit attention in BEREC's competition analysis. Addressing aggressive lease aggregation practices would provide a more comprehensive understanding of competitive pressures along the entire value chain and ensure that regulatory approaches reflect both the downstream and upstream realities of network deployment. **The mandate under Article 3(2) of the Gigabit Infrastructure Act, which requires negotiations on access to land to be conducted in good faith and for regulators to collect information about the conclusion of such agreements provide a natural reference point for such work.**

Call to Action
We encourage BEREC to **include access to land and lease aggregation** both as part of its **2026 fact-finding report on competition indicators and** of the Gigabit Infrastructure Act implementation. Specifically, BEREC could: • Analyse the impact of lease aggregation on infrastructure costs and rollout speed • Examine comparative approaches ensuring fair and sustainable access to land; and • Develop guidance for NRAs to prevent speculative practices and support efficient tower deployment
By doing so, **BEREC would help ensuring that TowerCos can fully deploy their investment and build-out potential in support of Europe's connectivity objectives thereby reinforcing the overall objectives of competition, efficiency, and network expansion under Strategic Priority 1 - Promoting full connectivity**

Boosting Europe's 5G densification through effective SAWAP deployments

- **Ensuring effective local frameworks for Small-Area Wireless Access Points**

Vantage Towers wishes to underline the importance of ensuring that local deployment frameworks for small-area wireless access points (SAWAPs) function effectively. Implementation of Article 57 of the European Electronic Communications Code (EECC) remains inconsistent across Member States. Persistent obstacles, such as limited municipal awareness, restrictive technical definitions, and lack of access to power or fibre connections continue to slow network densification and urban connectivity improvements.

- **Addressing practical barriers to efficient SAWAP deployment**

In our operations, we have observed persistent difficulties faced by both operators and municipalities in applying the SAWAP provisions. The current 10-watt power limit and too narrow definition of "small area" restrict the use of advanced small-cell equipment and significantly reduce deployment efficiency. Many local authorities remain unaware of their obligations under Article 57 EECC, and limited access to power and fibre connections further hinders the reuse of urban furniture. Vantage Towers therefore supports revisiting the power threshold and equipment

size parameters to reflect technological realities while maintaining proportionate safeguards for urban environments.

- **Leveraging BEREC's Role to drive consistency and best practices**

In our view, *Section 1.11 "Work on 5G private networks and hybrid networks"* of the Draft Work Programme offers a suitable framework to address these challenges. BEREC could play an instrumental role in collecting data on SAWAP implementation across Member States, identifying best practices and persistent barriers, and encouraging structured cooperation between NRAs and municipalities. Particular attention should be given to the interaction between the SAWAP framework, local planning rules, and energy/fibre access, where coordination remains weak despite strong policy intent.

Call to Action
Vantage Towers encourages BEREC to **include a dedicated workstream on SAWAP implementation within its 2026 Work Programme.** By promoting consistency, transparency, and collaboration among national and local authorities, BEREC can contribute to unlock the full potential of small-cell infrastructure, an essential building block for Europe's 5G densification and full connectivity objectives, in line with BEREC's strategic priority of promoting full connectivity.