



ecta RESPONSE

**TO THE PUBLIC CONSULTATION BY BEREC
ON THE
BEREC STRATEGY 2026 - 2030**

BOR (25) 80

15 July 2025

Introduction

1. **ecta**, the european competitive telecommunications association¹, welcomes the opportunity to provide short-form comments on the draft BEREC strategy 2026 - 2030, BoR (25) 80.
2. **ecta** represents those alternative operators who, relying on the pro-competitive EU legal framework that has created a free market for electronic communications, have helped overcome national monopolies to give EU citizens, businesses and public administrations quality and choice at affordable prices. **ecta** represents at large those operators who are driving the development of an accessible Gigabit society, who represent significant investments in fixed, mobile and fixed wireless access networks that qualify as Very High Capacity Networks (hereafter ‘VHCN’) and who demonstrate unique innovation capabilities.

2. Key **ecta** comments

3. **ecta** expresses its **support** for the general direction of the draft BEREC strategy 2026 - 2030, while noting specific nuances contained in this response.
4. BEREC must ensure its strategy is fully aligned with the objectives listed in Article 3(2) of the European Electronic Communications Code (EECC).
5. **ecta** calls on BEREC to resist any pressure to go beyond the scope of applicable legislation in the formulation of its strategy. Reassessment of BEREC’s strategic priorities should only be reconsidered if and when amendments to the EU legislative framework enter into force.
6. While **ecta** does not oppose the **substance** of Draft Priority 4—“*Contributing to environmentally sustainable, secure, and resilient digital infrastructures*”—it urges BEREC **not to present these elements as a standalone Strategic Priority**. The rationale is that **Article 3(2) of the EECC does not identify environmental sustainability as a regulatory objective**. By labelling it a “priority,” BEREC risks placing environmental sustainability on the same level as the legally established priorities in Article 3(2), which could lead to a misalignment with the current legislative framework.
7. **ecta** thanks BEREC for its robust defence, in its July 2025 response to the European Commission’s Call for Evidence on the Digital Networks Act, of the promotion of competition, citizens’ interests and the Significant Market Power regime. **ecta** asks BEREC to maintain and actively promote this position throughout the upcoming EU legislative cycle.
8. **ecta** asks BEREC to make fuller use of its mandate by **adopting more Common Positions and issue more Best Practice documents**. This is in-line with Article (4)(1)(k) , as contained in Regulation (EU)2018/1971: “*to issue recommendations and common positions, and disseminate regulatory best practices addressed to the*

¹ <https://www.ectaportal.com/about-ecta>.

NRAs in order to encourage the consistent and better implementation of the regulatory framework for electronic communications;"

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In case of questions or requests for clarification regarding this contribution, BEREC and NRAs are welcome to contact Mr Luc Hindryckx, [ecta](#) Director General or Ms Pinar Serdengeci, [ecta](#) Regulation and Competition Affairs Director.