



Contribution to Berc Work Programme 2021

04.11.20

TeleCoop is the first french cooperative telecom operator engaged in the environmental and inclusive transition : <https://telecoop.fr/>

We actively participate to the Arcep (french Berc) workshop sessions on how to reduce ecological footprint of the telecom sector, which will lead to a report in 2021 : <https://numeriquesoutenable.arcep.fr/>

We participate as well to the Ademe (french energy management agency) sessions about environmental information on telecom customer's bill: from 2021, french law will oblige operators to inform customers about their carbon footprint. We notably advocate for broader information that would concern global environmental footprint, mainly smartphone's one.

TeleCoop is glad to notice that in its 2021 work programme, Berc will open a new chapter starting promoting sustainability in the digital sector **(5.3.8)**. Nevertheless, with regard to the scale of the issues, here are suggestions to strengthen the Berc 2021 action plan:

- Before addressing sustainability issues related to the technical operations of BEREC and the BEREC Office, the work programme should underline what the normative targets are : we have to reduce our GHG emissions by 7,6 % per year¹ whereas the energy footprint of the digital sector increases by 9 % per year.² Consequently, the promotion of sustainability in the digital sector described on page 41 and 42 of the Berc work programme should be built on the basis of a clear GHG reduction target.
- French NRA Arcep will publish (1st semester 2021) a report of measures on how to reduce the negative impact of digital sector on the environment. French energy management agency Ademe will publish (1st semester 2021) a report on the positive and negative impacts of the digital sector on the environnement. Consequently, and considering :

¹ <https://unfccc.int/fr/news/il-faut-reduire-les-emissions-mondiales-de-76-par-an-au-cours-de-la-prochaine-decennie-pour>

² https://theshiftproject.org/wp-content/uploads/2018/10/R%C3%A9sum%C3%A9-aux-d%C3%A9cideurs_Pour-une-sobri%C3%A9t%C3%A9-num%C3%A9rique_Rapport_The-Shift-Project.pdf

- the urgency of the climate crisis
- the Covid-19 crisis increasing the importance of the telecom sector in the daily life of European citizens
- that among the 28 EU countries the state of art about the main impacts of the digital sector on environment is mature enough to tackle some issues
- that even if a Berec study is essential to share common datas in details, we already know that environmental impacts and GHG emissions are predominantly due to **production** + transport of devices and unregulated videos consumption³
- that environmental issues of the telecom sector need a quick coordination at the European level in the context of 5G development

... TeleCoop suggests to include in the second part of the work described in 5.3.8 :

- a. a specific evaluation on the negative and positive environmental impacts of 5G, namely the evaluation of the « hidden costs » - externalities.
- b. an evaluation of the part of smartphones sold in Europe thanks to telecom operators - in order to enlighten the debate with datas on business model of telecom operators at the root of the main environmental issues.

...TeleCoop suggests a third part for the work described in 5.3.8 :

- c. Produce operational recommendations at the european level – not only for NRAs.
- d. Present these recommendations to the European Commission and the European Parliament in 2021.
- e. Produce recommendations to empower and making Berec mandatory to consult before starting any directive project potentially increasing the impact of the telecom sector on environment.
- f. Evaluate the financial support needed by Berec to produce a full range of datas shared by the EU countries on environment and the digital sector.

TeleCoop - aware that this 2021 work programme does not only concern environmental issues - wishes all the best to Berec and would be honoured to contribute.

Best regards,

³ Ibid.

The TeleCoop shareholders and customers.