

# Draft BEREC Report on empowering end-users through environmental transparency on digital products

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During its 57th plenary meeting (from 6th to 8th December 2023), the BEREC Board of Regulators has approved the [Draft BEREC Report on empowering end-users through environmental transparency on digital products](#) for public consultation.

BEREC considers end-users' awareness of environmental issues as critical for end-users' empowerment and for ICT sustainability. Environmental information on digital products and services could enlighten user choices in terms of their digital consumption. Complementary to effects on the demand side, this data-driven approach of end-users' empowerment could create positive incentives for digital players to support the deployment of greener digital solutions and limit the risk of greenwashing.

In 2023, BEREC lead a fact-finding process to raise NRAs' knowledge of existing work and analysis of environmental transparency on ICT sustainability products and end-users' empowerment. This work took the form of a review of literature and existing EU regulation, a workshop on end-users' empowerment and ICT sustainability with representatives of the Commission, consulting firms, BEUC and the European Environmental Bureau (EEB), and an internal questionnaire on NRAs and other relevant stakeholders' initiatives.

Main results of this work are presented in the draft Report.

The report consists of 5 chapters:

- Introduction of the topic within the context of BEREC work on environmental sustainability and on end-users empowerment;
- Presentation of the key concepts on empowering end-users through digital products' information based on the currently valid and newly proposed EU legislation and latest research by public bodies (esp. the EC) and other entities;

- Summary of the main results of the workshop held in cooperation with the Commission, BEUC and EEB;
- Analysis of the responses provided by member NRAs on the activities and initiatives thereof, of OCAs and third parties (NGOs and industry).
- Conclusions and potential areas for future work.

All stakeholders are invited to submit their inputs via EU survey portal no later than **12 February 2024 (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](mailto: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

Organisation

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) here:

The University of Oulu would like to thank the BEREC for the opportunity to provide feedback on the recent sustainability work at the BEREC. The University of Oulu finds the work of BEREC addressing the environmental transparency of digital products and services to be very important and timely. The topic of empowering end-users is a very important to be considered, covering also the end users as active producers and developers.

The heading of the draft report limits the scope to “digital products”. When it comes to the information and communication technologies (ICTs), digital services are equally important as digital products. Actually, the contents of the draft report also consider digital services. The heading could be updated to consider both “digital products and services.”

The last paragraph states that “BEREC aims to adopt a holistic approach to the issues related to ICT sustainability.” This holistic approach in the report is said to consider the perspectives of a) networks, data centres, devices, digital services and ways, b) the entire life cycle of digital products, c) relevant environmental impacts including greenhouse gas emissions, energy consumption and abiotic resources used (mineral/metal), and d) different markets. The holistic approach lacks a thorough treatment of the computing infrastructure, whose role keeps increasing. Therefore, it would be important to consider the role of the computing infrastructure as well.

The presented holistic approach primarily considers the environmental footprint of digital services and products. Additional dimensions for a holistic sustainability approach in the on-going ICT sustainability considerations include 1) footprint and handprint dimensions, and 2) environmental, social and economic sustainability perspectives. The draft BEREC report focuses on the environmental footprint of digital products and services, but there was no mentioning of the environmental handprint (i.e., the potential positive impact of the digital products and services) or the social or economic sustainability perspectives. It would be good to mention these additional sustainability dimensions and state that the current BEREC work focuses on the environmental handprint. Future work could address these perspectives as part of the holistic approach.

2) Please enter your comments on Chapter 2 (Key concepts on empowering end-users through environmental information on digital products) here:

Chapter 2 on Key concepts presents very important information about the regulatory developments around ICT sustainability in Europe. It would be helpful to provide clear explanations for the introduced terms, such as environmental transparency, to guide the community.

3) Please enter your comments on Chapter 3 (Summary of BEREC Workshop on End-Users’ Empowerment through environmental transparency on digital goods and services) here:

Chapter 3 presents the findings from a consulting study and a stakeholder workshop with representatives from consumer two consumer and environmental organisations. The collected data does not include inputs from the research domain. For a wider engagement of stakeholders, it would be important to include the research community in the regulatory work on ICT sustainability in Europe in the future.

4) Please enter your comments on Chapter 4 (Existing national initiatives in the Member States) here:

Chapter 4 presents a collection of existing national initiatives from the national regulatory authorities, which provides very important and up-to-date information for the community. At the same time, it shows how scattered the developments are in Europe, which calls for future work.

Regarding Section 4.3 on Benchmark of third parties' initiatives, there is very little information provided about the research activities around ICT sustainability, which takes place in European and national research projects (e.g., in SNS JU). It would be important to develop new ways of working to include research activities and research findings around ICT sustainability into the work of BEREC.

5) Please enter your comments on Chapter 5 (Conclusions: Summary and future work) here:

The current draft report focuses on the footprint of digital products and services, which is a very important topic. The draft report provides important status information and sets the steps for the future work. Future work would be needed not only on the footprint of digital products and services but also on their handprint. ICT sector's sustainability considerations have started to include the well-known triple-bottom line of sustainability, with three interrelated perspectives of sustainability including social, economic and environmental perspectives. It would be good to mention these three perspectives even though the current draft report primarily focuses on the environmental perspective. Future work is needed to address the three interrelated sustainability perspectives and their tradeoffs.

Many national and EU level research initiatives address the sustainability of the ICT sector and specifically the environmental sustainability perspective. There is a need to bring the expert community of researchers and other experts to the table. It is very positive that the BEREC identifies the need to ensure that the information provided to consumers is science-based and actionable. The BEREC could build a bridge between the regulatory domain and the research domain to national-level and EU funded research projects by creating mechanisms for information sharing, requirements collection and joint development of best practices. The BEREC is encouraged to invite the research community to provide unbiased research results and also encourage the industry and operators to share their data and methodologies with the research community, to tackle the big ICT sustainability topic as a joint effort.

6) Please enter any other comments you may have:

A glossary of the terminology used in the report would be very helpful as an annex, similar to the two previous BEREC Reports on sustainability. Clear explanations for the used terminology would act as guidelines for the entire community to work on the ICT sustainability topics. BEREC could have a role in this.

The environmental footprint of digital products 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 digital products and services. It would be important to mention and consider the handprint in the current report and in the future studies of BEREC.

Independent research conducted at academic and other organizations plays an important role in the topic of ICT 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 proper 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.

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 empowering end-users through environmental transparency on digital products

### Contact

Sustainability\_PC@berec.europa.eu

## Contact

[Contact Form](#)