

BoR (25) 01

Outline BEREC Work Programme 2026

BEREC aims to foster the independent, consistent, and high-quality regulation of digital markets for the benefit of Europe and its citizens.

30 January 2025

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I. INTRODUCTION

The Body of European Regulators for Electronic Communications (BEREC) was established in 2009 and now operates under Regulation (EU) 2018/1971¹ (the BEREC Regulation) with the aim of pursuing the objectives under the European Electronic Communication Code (EECC)² and in particular to ensure the consistent implementation of the regulatory framework for electronic communications.

This document is the Outline of the annual work programme of BEREC for 2026, which has to be adopted by 31 January 2025³.

The objectives of the Outline BEREC Work Programme 2026 continue to be based on the mandatory tasks falling to BEREC stemming from the EECC. Implementing the relevant regulatory framework in a consistent way is to the forefront of BEREC's work.

The BEREC Strategy 2021 – 2025 is expiring at the end of 2025. While the BEREC work programme 2025 envisages the elaboration of a reviewed Strategy to be applied from 2026, the Outline BEREC Work Programme 2026 to be delivered in January 2025 is still structured around the BEREC Strategy 2021 – 2025^4 . Despite this, the adopted final Work Programme 2026 will be aligned with the upcoming BEREC mid-term Strategy.

The Outline Work Programme 2026 reflects BEREC's commitment to serve as a body for thoughtful and proactive debate that provides advice to the European Parliament, the Council, and the European Commission in the field of electronic communications and digital services. Furthermore, BEREC aims to play an important role in further improving the consistent and harmonised application of regulatory rules, to enhance its working methods and to engage cooperatively and effectively with stakeholders.

Following the approach taken in previous years and in accordance with Article 21 of the BEREC Regulation, the outline BEREC Work Programme 2026 will be consulted with the European Parliament, the Council, and the European Commission on their priorities and after input is received from the EU institutions and BEREC's stakeholders, a draft Work Programme for 2026 will be subject to a public consultation. The public consultation will run for a 4-week period in autumn 2025. The final BEREC Work Programme 2026 will be adopted at the fourth BEREC Board of Regulators meeting in December 2025. BEREC will publish and transmit the annual work programme for 2026 to the European Parliament, the Council, and the Commission, as soon as it is adopted.

¹ Regulation (EU) 2018/1971 of the European Parliament and of the Council of 11 December 2018 establishing the Body of European Regulators for Electronic Communications (BEREC) and the Agency for Support for BEREC (BEREC Office), amending Regulation (EU) 2015/2120 and repealing Regulation (EC) No 1211/2009

² Directive (EU) 2018/1972 of the European Parliament and of the Council of 11 December 2018 establishing the European Electronic Communications Code (Recast), Regulation (EU) 2015/2120 of the European Parliament and of the Council of 25 November 2015 and Regulation (EU) No 531/2012 of the European Parliament and of the Council of 13 June 2012, as amended

³ According to Article 21 of the BEREC Regulation

⁴ The three objectives relating to promoting competition and investment, promoting the internal market and empowering and protecting end-users were already guiding BEREC's work in the past two medium-term strategies of 2015-2017 and 2018-2020 and continue to be pursued in current mediumterm strategy 2021-2025

II. BACKGROUND

The four objectives of the EECC (Article 3 (2))⁵ remain the foundation of the assignments set out in BEREC's annual work programmes and continue to be the guiding force of the proposed Work Programme. These four objectives are:

- Promoting connectivity and access to very high-capacity networks (VHCN),
- Promoting competition and efficient investment,
- Contributing to the development of the internal market,
- Promoting the interests of the citizens of the Union.

The EECC, the BEREC Regulation ⁶, the Open Internet Regulation (Regulation (EU) 2015/2120)⁷, the Roaming Regulation (Regulation (EU) 2022/612)⁸, the Gigabit Infrastructure Act (Regulation (EU) 2024/1309⁹, the EEA Directive (EU) 2019/882, the Digital Markets Act (DMA, Regulation (EU) 2022/1925)¹⁰, and the mandatory tasks stemming from these legislative instruments, provide the basis for the Outline BEREC Work Programme 2026.

In line with the legislative framework, BEREC has adopted a currently valid strategy that defines the high-level strategic priorities that guide the work of BEREC. While the Outline Work Programme 2026 seeks to address current regulatory challenges, it has also been developed to prepare for the new challenges ahead resulting from political, economic, and technological developments. It also addresses the fact that BEREC's Strategy for the years 2021-2025 will expire in the year of the preparation of the BEREC work programme 2026 and the new BEREC Strategy 2026-2030 will be adopted. The review of the BEREC's strategies will consider the BEREC Action Plan as building block to shape the regulatory activities in the coming years.

This Outline Work Programme 2026 contains those items from the 2025 Work Programme¹¹, which will be carried over and completed in 2026 in addition to *ad-hoc* or recurring items, including some preliminary identified potential workstream proposals. BEREC has consulted those potential workstreams¹² and considered the received input.

As required by the BEREC Regulation, when developing its annual Work Programme, BEREC seeks the views and proposals from the National Regulatory Authorities (NRAs) participating in BEREC and BEREC's own Working Groups and the European institutions (Article 21.1 Regulation (EU) 2018/1971). Third parties and stakeholders are also invited to participate by means of the annual meeting with stakeholders and the public consultation on the draft Work Programme. Specifically, BEREC organizes an annual forum with stakeholders ('Stakeholder Forum') with the aim to enhance transparency and collect the interested parties' views on BEREC's current and future work and, in particular, for the elaboration of the work programmes. The Stakeholder Forum will be held on Tuesday, 01 April 2025. The public consultation of the Draft Work Programme 2026 will be launched in autumn 2025. The final BEREC Work Programme 2026 will be adopted at the fourth BEREC Board of Regulators

¹¹ BoR (24) 183

⁵ Directive (EU) 2018/1972 of the European Parliament and of the Council of 11 December 2018 establishing the European Electronic Communications Code (Recast)

⁶ <u>https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1971</u>

⁷ <u>https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015R2120</u>

⁸ https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022R0612&qid=1699465943801

⁹ <u>https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024R1309</u>

¹⁰ <u>https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022R1925</u>

¹² See also Section VII on Potential work for 2026 and beyond

meeting in December 2025, after the submissions to the public consultation have been considered.

Finally, BEREC is mindful that there is a potential confluence of policy and legislative initiatives mentioned below, which may require BEREC to amend this outline Work Programme for 2026 accordingly. This Work Programme also seeks to be consistent with the vision, targets, and roadmaps for Europe's digital transformation by 2030, set out in the Digital Compass and the Policy Programme 'Path to the Digital Decade', the EU Global Gateway strategy (2021) and the European Green Deal (2020). In addition, The Outline Work Programme 2026 aims to be aligned with the new priorities for the EU of the new European Commission for electronic communications, digital services and infrastructures, as well as for the international cooperation and relations with third countries. Amongst the potential policy and legislative initiatives mentioned are:

- The evaluation by the Commission, of BEREC's and the BEREC Office's performance in relation to their objectives, mandate, tasks, and location and reporting of the findings to European Parliament, the Council and the Management Board by 21 December 2023 in accordance with Article 48 Regulation (EU) 2018/1971.¹³
- In February 2024 the European Commission published a White Paper 'How to master Europe's digital infrastructure needs?' for public consultation. The document elaborates on the technological and market trends in the digital infrastructure sector, points to some challenges allegedly stemming from the current regulatory framework and puts forward possible regulatory options. The Paper is outlining a long-term vision and potential policy actions to encourage investments in digital infrastructure.¹⁴
- BEREC provided its input to the European Commission's public consultation on the White Paper "How to master Europe's digital infrastructure needs?" as its views on the technological trends and market developments, emphasizing that competition remains the most powerful tool incentivising operators to invest and innovate and end users receive electronic communication services at best quality and affordable prices. BEREC also analysed the EC's proposals for the future of digital networks, examining the framework's scope and objectives, general authorization, radio spectrum, copper switch-off, access regulation and remedies. BEREC focused as well on universal service (including affordability aspect), sustainability, network security and resilience. In the document, BEREC pointed out that the scenarios/proposals enshrined in the White Paper need to be framed within the full context of the electronic communications' legislative framework, including Open Internet and end-user protection, which are essential to uphold. In its input, BEREC expressed its willingness to continue the dialogue with the EC and contribute to future Commission initiatives falling within its remit, particularly those related to the governance of the digital sector and additionally, to assist the co-legislators in preparing the new regulatory framework for digital

¹³ At the time of writing, the findings of the EU Commission evaluation have yet to be reported on and made public. Nevertheless, BEREC has published its input to the EU Commission on the functioning of BEREC and the BEREC Office. BEREC considers that its input is a most valuable/helpful contribution to define BEREC's path. Please see here for more information <u>https://www.berec.europa.eu/en/document-categories/berec/reports/berec-input-to-the-european-commission-on-the-functioning-of-berec-and-the-berec-office-in-view-of-the-evaluation-under-article-48-of-the-berec-regulation - September 2023.</u>

¹⁴<u>https://digital-strategy.ec.europa.eu/en/news/commissioner-breton-calls-more-private-investment-connectivity-infrastructure</u>

infrastructure (announced as "Digital networks act") and related legislation, including potential changes in the current electronic communications legislative framework (EECC). On top of the recently published reports¹⁵, BEREC plans to contribute on several issues covered by the White Paper and recently published strategic reports, such as General Authorization, and the implementation of the EECC provisions regarding co-investment, commitments and wholesale-only undertakings.

- BEREC developed its vision of an EU regulatory environment fit for the digital age and the global context in its 2030 Action Plan¹⁶. BEREC observes that the market and technological developments are not only changing how we communicate by means of new services, but also adding complexity to the internet ecosystem via the entry of new players, the changing roles of traditional players, and the rise of new competition bottlenecks in the value chain and the removal of others. New challenges related to ensuring end-users' rights and cybersecurity in such new context emerge and the regulatory focus is expanding to actively contribute to achieving sustainability goals. This evolution requires a holistic perspective for electronic communications' regulation, also in the light of its ever-increasing interplay with the broad framework of European digital legislation.
- By 21 December 2025 and every five years thereafter, the Commission has to review the functioning of the EECC and report to the European Parliament and to the Council. While BEREC has commenced work that will be relevant to this review, it is unclear how this required review could interplay with any policy or legislative initiative that might emanate from the White Paper and the exploratory consultation on the future of the electronic communications sector and its infrastructure.
- The EC has to also consider BEREC's opinion in the context of the specific review procedure regarding end-users' rights¹⁷ issued at the end of 2024¹⁸.

BEREC will respond accordingly to any developments that might arise and require consideration for inclusion in the Work Programme 2026.

¹⁵ BoR (24) 177 BEREC Report on the IP Interconnection ecosystem

¹⁶ BEREC Action Plan for 2030 BoR (23) 48 . The Action Plan develops around five strategic orientations: i) fostering national and international connectivity to reach the objectives of Europe's Digital Decade by 2030; ii) facilitating an open and sustainable internet ecosystem and supervising the evolution of the digital landscape; iii) providing for the security and resilience of the networks and services; iv) contributing to the achievement of environmental sustainability goals and v) strengthening BEREC's agility, independence, inclusiveness, and efficiency as a centre of expertise. https://www.berec.europa.eu/en/document-categories/berec/others/berec-action-plan-for-2030

¹⁷ Art. 123 of the Code

¹⁸ BoR (24) 180 BEREC Opinion on the market and technological developments and on their impact on the application of rights of end-users in the EECC (Article 123)

III. BEREC WORK IN 2026

BEREC will execute its work streams around the four strategic objectives of the EECC and in doing so BEREC will take into consideration the high-level strategic priorities arising from the new BEREC mid-term Strategy that will be identified as most relevant for meeting all strategic objectives, as well as the institutional and international cooperation.

In addition, considering that digital transformation in electronic communication networks and services poses new challenges to the current roles and mandates of the NRAs and to which these need to adapt (e.g. technological developments, traditional and digital market developments, economic and environmental sustainability, cybersecurity, resilience, data sovereignty), BEREC will continue to include in the BEREC Work Programme items on emerging challenges and issues beyond the traditional scope of the electronic communication regulation.

BEREC will review in 2025 the three strategies¹⁹ to set its objectives in view of the latest and expected relevant market, technological and regulatory developments for the next five years. The strategies will be merged into a single document. This approach will allow benefiting from synergies and the highest coherence in all dimensions of BEREC's work. The main strategic priorities stemming from the new strategy will be reflected in the final version of the Work programme 2026, which will be adopted in the fourth BEREC Board of Regulators meeting in December 2025.

¹⁹ BEREC Strategies 2026-2030 will include Mid-term Strategy, International and Institutional Strategy.

1. High-level strategic priorities

Taking into account the current strategic priorities and based on the market developments and on the foreseen evolution of the European regulatory and political framework, BEREC will in the new Strategy set its objectives in view of the latest and expected relevant market changes, technological and regulatory developments for the next five years.

In addition, and in view of the fast-evolving changes taking place in the sector, BEREC recently published an Action Plan for 2030 as a continuation for contributing to the efficient regulatory environment in Europe, fit for 2030. It builds on five strategic orientations:

- i) Fostering national and international connectivity to reach the objectives of Europe's Digital Decade by 2030,
- ii) Facilitating an open and sustainable Internet ecosystem and monitoring the evolution of the digital landscape,
- iii) Providing for the security and resilience of the networks and services,
- iv) Contributing to the achievement of environmental sustainability goals and
- v) Strengthening BEREC's agility, independence, inclusiveness, and efficiency as a centre of expertise.

Within these five strategic orientations, a total of 14 BEREC long term strategic actions have been identified. The review of BEREC's strategies will consider this Action Plan as building block to shape the regulatory activities in the coming years.

Europe's Digital Decade, as well as the role that BEREC plays in the High-Level Group of the DMA (DMA HLG) to ensure both its coherent implementation and the interplay with other regulations (such as the AI Act and the Data Act), will be considered when formulating the future BEREC work programmes.

BEREC will pursue working on its contribution to ICT-related goals provided by the Green Deal and the United Nation's Agenda 2030 by adding, where appropriate, environmental dimensions to workstreams as well as identifying how BEREC can further contribute to the achievement of the sustainable development goals, as an organization.

BEREC will also continue its work with regard to future trends and technological innovations, such as virtualization and cloudification, internet-based platforms and services, AI, AR/VR, 6G, satellite or metaverses and other technologies that might influence electronic communications markets and potentially impact on regulation as well as on end-users. The following three strategic priorities are currently valid and will be aligned with the new mid-term strategy in the final BEREC Work Programme 2026.

Strategic priority 1: Promoting full connectivity

Promoting connectivity and access to electronic communication networks has been a strategic priority for BEREC in the years 2021 – 2025 and before. This implies prioritizing work that improves the conditions for the expansion and take-up of secure, resilient, competitive, and reliable very high-capacity networks (both land and undersea, fixed, and wireless) across Europe.

Strategic priority 2: Supporting sustainable and open digital markets

Under this priority, BEREC will prioritize work that relates to the functioning, openness and sustainability of the digital markets. This implies focusing on issues that explore regulatory

conditions and address issues for digital service providers and end-users in the digital markets. Based on its experience, BEREC will continue to contribute to the implementation of the DMA within the High-Level Group. With adoption of the Data Act (DA), several BEREC members may be or have been already designated as the national competent authority responsible for the application and enforcement of (some chapters of) this legislation. In the context of the Digital Services Act (DSA), many BEREC members are the national Digital Services Coordinators (DSC) implementing the regulation in the respective Member States in collaboration with the EC and other competent authorities. BEREC provides a further coordination network for DSCs. BEREC's insights could also be valuable for the preparation of the implementing and delegated acts that the Commission is required to adopt under this regulation. BEREC will be following the developments regarding the Artificial Intelligence Act, with a view to providing relevant input to EU institutions as well. In addition, BEREC will further contribute to the assessment of the Commission regarding how to both measure and reduce the carbon footprint of providing digital and electronic communications services.

Strategic priority 3: Empowering End-users

Promoting the interests of consumers in the fast-evolving digital ecosystem will require strong consumer protection rules, transparency and (new) digital skills.

BEREC will continue to prioritise work that empowers end-users to make better informed choices in relation to digital services, adding sustainability aspects to it. BEREC will also further support building trust in ICT.

This strategic priority relies on a regular dialogue with consumers' associations, civil society representatives and other relevant stakeholders.

2. Cooperation with EU institutions and institutional groups

Institutional cooperation

In the recent years BEREC has collaborated and liaised with many European institutions, regulatory cooperation bodies and networks, and expert bodies operating both in adjacent and different economic sectors. This has resulted in rich information sharing exchanges, for the benefit of BEREC and its stakeholders.²⁰

Complementing the overarching strategies, in 2021 BEREC published a BEREC Medium-Term Strategy (MTS) for relations with other institutions (2022-2025) and a BEREC Medium-Term Strategy for International Cooperation (2022-2025). As mandated by Article 35(3) of the BEREC Regulation, BEREC's strategies for relations with competent Union bodies, offices, agencies and advisory groups, with competent authorities of third countries and with international organisations concerning matters for which BEREC is competent are reflected as well in BEREC's annual work programme.

This MTS recognises the importance of prioritising collaboration with RSPG in the Peer Review Forum and on matters of mutual interest. Cybersecurity is another thematic area that BEREC has identified as key to reach its strategic objectives, thus the MTS for relations with other institutions identifies the European Union Agency for Cybersecurity (ENISA) as one of the most important EU institutions for cooperation in this field. BEREC will also seek to collaborate with the European Regulators Group for Audio-visual Media Services (ERGA), the European Regulators Group for Postal Services (ERGP), the European Data Protection Board (EDPB), the European Competition Networks (ECN), and Consumer Protection Cooperation Network (CPC) on matters related to the functioning of the digital markets in line with a strategic Priority "Supporting sustainable and open digital markets" of the BEREC strategy. The MTS also recognises the importance of collaborating with entities who are competent in matters related to sustainability, QoS/QoE, infrastructure sharing, and standardisation (in particular CEPT, Com-ITU, ETSI, CEN-CENELEC), in accordance with Article 39 of the EECC.

BEREC will stay open to information-sharing with all institutional entities, keep identifying thematic areas and relevant entities to build new relationship with the relevant institutions according to its valid MTS for relations with other institutions.

International cooperation

The increasing volume of electronic communications between the EU and the rest of the world shows its global nature and the need for policies, legislation, and regulation to be put into more global perspective. BEREC benefits from the cooperation with NRAs and with international regulator networks, policymakers and institutions involved in communications matters based beyond the EU, identified in the MTS for International Cooperation.

The current MTS for International Cooperation seeks to identify those international relationships, which are most beneficial to the attainment of BEREC's priorities and fulfilment of its work programme, in line with BEREC's resources and to help meet the legal provisions

²⁰ For example, BEREC and RSPG adopted a joint position on EMF issues in 2020 (<u>here</u>) and BEREC has maintained information about different levels of cooperation between national competent bodies for EMF and on national policies on monitoring, communicating and implementing EMF-related issues (<u>here</u>).

in Article 35(3) of the BEREC Regulation, which requires BEREC to adopt a strategy for relations with international entities in the annual work programme.

According to the MTS BEREC will continue the dialogue with NRAs based outside the EU, as well as with international regulatory networks, policy makers and institutions in the field of electronic communications and digital services. BEREC, in accordance with Article 3(3) and Article 8(1) of Regulation (EU) 2018/1971, and recitals 5, 13, and 22 thereof, is mandated to provide expertise and act independently.

BEREC's international activities complement the policies of the European Union both in terms of the subjects of cooperation and the priority regions to cooperate with.

In 2026, BEREC will continue to develop and strengthen its ties with regulatory authorities such as the FCC, TRAI, CRTC²¹, with regional regulatory networks such as ARCTEL, EMERG, EaPeReg Regulatel²² and initiatives such as EU Global Gateway, in accordance with the BEREC Regulation and in cooperation with the EU external action services.

²¹ FCC (Federal Communications Commission, USA), TRAI (Telecom Regulatory Authority of India), CRTC (Canadian Radio-television and Telecommunications Commission)

²² ARCTEL (Association of Communications Regulators from Portuguese-speaking countries), EMERG (European Mediterranean Regulators Group), EaPeReg (Eastern Partnership of Regulators for Electronic Communications Networks and Services), and Regulatel (Latin American Forum of Telecommunications Regulators).

3. BEREC tasks under the EU legislation

There is also a significant number of tasks that BEREC carries out and follows up on an ongoing basis, described hereunder, under the following headings:

- The European Electronic Communications Code (EECC),
- Open Internet²³,
- Roaming and intra-EEA communications,
- The Digital Markets Act (DMA).

3.1 EECC

Ad hoc input to the EU/NRAs

BEREC will remain available to provide ad hoc input on request to the EU institutions (EC, Parliament, and Council), particularly during the review of the current regulatory framework as well as in the implementation phase of new legislation. BEREC will actively contribute by providing fact-based input from NRAs and market analyses, ensuring that regulatory consistency and competition principles remain central to any legislative developments. BEREC will also be the forum for its member NRAs to discuss newly emerging questions and issues.

BEREC Opinions under Article 32/33

BEREC will continue to issue opinions concerning new Phase II cases when they arise based on the expertise of the market analysis of its NRAs. The aim is to achieve a high degree of consistency regarding measures imposed by NRAs to contribute to the development of the internal market for electronic communications.

Peer review process

According to the EECC (Article 35), when an NRA and/or competent authority intends to undertake a selection procedure in relation to radio spectrum bands for which technical conditions have been harmonised in order to enable their use for wireless broadband electronic communications networks and services, it shall inform the RSPG about any such draft measures and indicate whether and when it will request the RSPG to convene a Peer Review Forum. The Peer Review forum shall be open to experts from BEREC.

Monitoring of the termination rates for mobile and fixed voice calls

Article 75(3) EECC requires NRAs to report annually to the Commission and to BEREC in relation to the implementation of the Delegated Regulation (EU) 2021/654 setting a single maximum Union-wide mobile voice termination rate and a single maximum Union-wide fixed voice termination rate.

²³ BoR (22) 81

3.2 Open internet

Implementation of the Open Internet (OI) Regulation and the BEREC Open Internet Guidelines

Regulation (EU) 2015/2120 (the 'Open Internet Regulation (OIR)') prescribes, among other things, that NRAs should 'closely monitor and ensure compliance' with the OIR and should 'publish reports on an annual basis regarding their monitoring and findings'.

Since 2017, BEREC has been publishing an annual report on the implementation of OIR and the Open Internet WG has provided a forum for discussion of national cases and questions to ensure a predictable and consistent application of the OIR.

In the 2026 work stream, BEREC will monitor the implementation of the open internet provisions among NRAs for the period from 1 May 2025 to 30 April 2026. BEREC will collect the annual national Open Internet reports and the responses to an internal questionnaire to prepare the annual European-level Open Internet report.

To support the NRAs' obligation to 'closely monitor and ensure compliance' with the Regulation, a forum will be held to discuss questions relating to the consistent application of the OIR on an informal basis in the form of experience sharing and exchange of information on important decisions in national cases.

3.3 Roaming and intra-EEA communications

International Roaming benchmark data and monitoring report

Article 21 of the Roaming Regulation establishes a yearly obligation for BEREC to collect data and provide report for the European Commission. The report is based on collected data and includes information about price evolution, consumption patterns in the Member States, both for domestic and roaming services, the evolution of actual wholesale roaming rates for balanced and unbalanced traffic and the relationship between retail prices, wholesale charges and wholesale costs for roaming services. BEREC will launch the relevant annual data collection. The information that will be received from operators will be used for the preparation of the comprehensive yearly BEREC Roaming data report which will be published in 2026.

In case EC proposes a legislation to amend the Roaming Regulation after the 2025 review, BEREC will provide its opinion after analysing it, which might happen in 2026.

Intra-EU communications Benchmark Report

According to the regulation on Intra-EU Communications NRAs shall monitor the price developments of regulated intra-EU communications services. For this purpose, BEREC provides a template to contribute to a harmonised data collection in the EU/EEA. NRAs are therefore collecting data from both fixed and mobile operators on a yearly basis and submit the data to BEREC. In 2026 BEREC will publish the 77th Benchmark Report on the findings, based on data collection.

3.4 The Digital Markets Act (DMA)

As a member of a dedicated High-Level Group created under the DMA²⁴, BEREC continues to assist the European Commission by means of advice, expertise and recommendations relating to the implementation, evolution, and enforcement of the DMA.

In addition, BEREC advises the European Commission on matters related to the interoperability obligation for number independent interpersonal communication services (NI-ICS) imposed on gatekeepers pursuant to Article 7 of the DMA, and is at the EC's disposal for any other issue in relation to electronic communication services or where BEREC's experience can be valuable. As in the past, BEREC is eager to continue this fruitful cooperation with the EC in the future.

Furthermore, BEREC continues to monitor and analyse the developments in the digital markets and the impact and effects of the practices implemented by large digital platforms. Such monitoring exercises may translate into different types of BEREC deliverables (opinions, positions, workshops, etc.).

²⁴ Article 40 DMA

4. Quality and efficiency of regulation

An important role of BEREC is the establishment of best practices and share learnings among its members. BEREC carries out a number of tasks to support and assess quality and efficiency in regulation in Europe.

Article 32/33 Phase II process

Since 2014, BEREC has undertaken an annual analysis of Article 32/33 EECC Phase II cases, aimed at gaining a better understanding of both the procedural and substantive aspects of these cases to inform BEREC's members. In 2015, a comprehensive database of Phase II cases was developed, that includes all relevant information including final outcomes of the cases.

BEREC will continue to add new Phase II cases to this database as and when they arise. The objective is that the database can be consulted by BEREC members, in particular experts of Phase II cases, both for referencing a particular case and to analyse key themes amongst the cases over time.

WACC parameters' calculation according to the EC Notice

Following the Commission's Notice on the WACC of 7 November 2019, BEREC's task is to calculate various parameters of the WACC formula according to the methodology laid down in the EU WACC Notice. BEREC in close collaboration with the EC will also select a peer group of EU/EEA operators for the calculation of some of these parameters.

In order for NRAs to be able to take the parameters into account when calculating the WACC for the national markets BEREC will calculate the parameters until 30 June at the latest.

Report on regulatory accounting in practice

The Regulatory Accounting in practice Report will provide an up-to-date factual overview of the regulatory accounting frameworks used in Europe and an assessment of the level of consistency achieved by NRAs. The Report is prepared annually and updates the previous versions published since 2005. In 2026, emphasis will continue to be placed on consistency in regulatory accounting with respect to key access products (including e.g., fibre) and will seek to maintain the detail and the in-depth analysis of the methods covered to identify commonalities and reasons for differences. The Report will continue to collect data on the methodology and input parameters used to calculate the rate of return on capital employed and look into the impact of both on the result.

Collaboration on the Internet access service measurement tools

In 2026 and beyond, BEREC will continue to work towards a harmonised measurement framework and to support NRAs in their national measurement tool deployments.

BEREC will continue to provide a forum for NRAs to share information and exchange experiences and best practices related to development and deployment of national net neutrality measurement tools, taking also into account the support by new technologies. This workstream will also consider how to maximise the benefits of existing NRAs' cooperation in this area and to support the migration of interested NRAs towards a harmonised measurement tool by working together to improve the measurements and by sharing codes or components.

5. Communication and engagement

BEREC will continue to engage with stakeholders, with the goal of focusing its work on issues that are relevant to them, through communications, planning and reporting activities. Therefore, the Outline Work Programme 2026 envisages documents, and an event aimed at contributing to BEREC's objectives.

BEREC Communications Plan 2026

The BEREC Communications Plan sets out the communications activities that are planned for the particular year. The objective is to strengthen the perception of BEREC as an impartial, independent, European, forward-looking expert body and to support all BEREC strategic objectives –. The plan complements the BEREC External Communications Strategy, which sets out the overall approach of BEREC communications.

Typically, the plan includes several communications deliverables that support and promote specific workstreams in the annual BEREC Work Programme. They may include promotional and educational campaigns on social media, development of communications kits with production of audio-visual and digital content, information updates to the website, organisation of events, and promoting fruitful media relations. As part of the ongoing external communications, the deliverables are linked to regular BEREC events, such as public debriefings and annual Stakeholder Forum. In line with the objectives set out in the Communications Plan, BEREC will continue to communicate on the day-to-day activities of BEREC's work.

BEREC's Communications Plan 2026 will be finalised for internal use in December 2025.

Stakeholder Forum

BEREC prioritises engagement with its stakeholders by applying an open-door policy and investing in solid collaboration. Every year BEREC organises its major annual public event – The BEREC Stakeholder Forum, which is meant to serve as a platform for stakeholders and BEREC to engage in a dialogue on BEREC's future work. The 2025 conference part will focus on the role of End users in the in the evolving digital market and future approaches for market power regulation (Future SMP regime). The event features also "*Meet & Greet*" sessions, where stakeholders can have in-person meetings with the BEREC Working Group Co-chairs. The feedback received during the whole event complements the written inputs received during the first call for input and the public consultation for the final BEREC Work Programme.

BEREC Work Programme 2027

The BEREC Regulation sets out a process for developing the Work Programme. According to the Regulation, the Board of Regulators shall adopt the outline of its annual work programme by 31 January of the year preceding that to which the annual work programme relates. After consulting the European Parliament, the Council, and the Commission on their priorities, as well as consulting other interested parties, the Board of Regulators shall adopt the final annual work programme by 31 December of the same year. The Board of Regulators shall transmit the annual work programme to the European Parliament, the Council, and the Commission as soon as it is adopted. BEREC will provide a draft/provisional Work Programme outline by

the end of January 2026, and then work through the year to finalise the Work Programme for 2027 by the end of the year.

BEREC Annual reports

According to the BEREC Regulation, BEREC must provide its annual activity report to the European Parliament, the Council, the European Commission and the European Economic and Social Committee by 15 June of the year subsequent to the year reported on in the annual activity report. BEREC has to report annually on technical matters within its competence, in particular on the market developments in the electronic communications sector.

BEREC will continue to publish its annual report on its activities and an annual report on developments in the sector as part of a single document. Whereas the Annual Report on BEREC activities focuses on the outcome of the work of its Working Groups and ad-hoc teams based on the Work Programme, the Annual Report on developments in the electronic communications sector summarises BEREC's view on the past year as well as a perspective of future developments and challenges in the sector.

6. Projects brought forward from 2025

This chapter contains items that are continuations or follow up projects of the work started in previous years. In some cases, the second phase of a project is the finalization of a report after carefully considering the stakeholder input from a public consultation. More details about these specific projects are included in the BEREC Work Programme 2025 (BoR (24)183).

Fact finding report on the competitive landscape in different jurisdictions

The overall context of the electronic communications markets is adapting to the actual realities, with traditional electronic communications operators facing major changes in their business models, MNOs divesting their towers and sites to independent infrastructure companies, with digital players entering the sector and investing heavily in own infrastructure for end-users' services delivery and finally with more and more public funding put at work for the development of connectivity in economically non-attractive areas. Forward-looking, co-investments between electronic communications providers jointly deploying VHCNs, as well as the conclusion of strategic partnerships between various actors across the value chain are expected to reshape the communications ecosystem.

Overall, BEREC considers it appropriate to look at key competitive indicators in various jurisdictions in order to put together a comprehensive collection of data to depict, from a quantitative perspective, the envisaged trends.

The Fact Finding Report on the competition indicators and regulatory highlights in different jurisdictions will be adopted for public consultation at Plenary 4, 2025 and for publication at Plenary 2, 2026.

BEREC report on the integration of AI in the telecommunications sector

In March 2024, BEREC submitted its high-level position on Artificial Intelligence (AI) and virtual worlds (VW) to the European Commission (BoR (24) 68). The high-level position provides a holistic perspective and focuses on a variety of aspects building on BEREC's broader expertise.

BEREC's AI position builds on previous work, such as the BEREC reports on the application of AI solutions for the provision of ECN/ECS, on the internet ecosystem and the ex-ante regulation of digital gatekeepers, as well as the BEREC Report on Cloud and Edge Computing Services (BoR (24) 136), and the BEREC external study on the trends and cloudification, virtualization, and softwarization in telecommunications (BoR (23) 208).

Relying on BEREC's participation in the EC's Artificial Intelligence sub-group in the context of the Digital Markets Act High-Level Group, the proposed work may explore how the integration of Al influences some or all of the following: competition dynamics, internet openness, end-users' experiences, data protection, accessibility, security, sustainability and the digital divide. Moreover, BEREC's analysis could evaluate regulatory challenges and opportunities for fostering Al-technology innovation, while ensuring robust protection of end-users and promoting digital inclusiveness.

As a result, BEREC's contribution on the topic may take different forms (e.g. workshops/meetings with relevant stakeholders, opinions, papers, report).

BEREC draft report on the integration of AI in the telecommunications sector will be adopted for public consultation at Plenary 3, 2025, final report will be adopted at Plenary 1, 2026 for publication.

Internal workshop on the practices of data collections from NI-ICS providers

Number-Independent Interpersonal Communication Services (NI-ICS) are defined in the EECC and typically include messaging, videoconferencing, and e-mail services.

In its "Report on harmonised definitions for indicators regarding over-the-top services, relevant to the electronic communications markets" (BoR (21) 127) BEREC made available a series of definitions for NI-ICS indicators related to users and usage deemed central to NRAs' activities, in particular to assess the degree of competition between NI-ICS and number-based interpersonal communications services (NB-ICS) and among the different NI-ICS. Furthermore, BEREC reflected on possible revenue indicators and examined why they may be relevant to the electronic communications sector (BoR (22) 183). This report from 2022 concludes that NRAs find themselves at an early implementation stage of the EECC's provisions regarding NI-ICS and are in the process of discerning which information is needed to carry out their tasks and to start collecting data.

The BEREC workshop on the practices of data collection from NI-ICS providers is intended to allow NRAs to give an update on current and planned data collection of NRAs and associated used indicators and the utilization of gathered data (e.g. monitoring, publications, determination of financial contributions to universal service obligations funds). The workshop will focus on identifying best practices and touch upon used classifications (e.g. as NI-ICS or a specific category of NI-ICS), functionalities for business users to reach end users (e.g. for customer support or sales).

The workshop to be held in Q4 2025 shall contribute to regulatory tasks of NRAs and the harmonisation of the indicators collected. Adoption of the workshop summary report is expected at Plenary 1, 2026.

BEREC report on switching and termination of contracts

This project builds on the work done by BEREC in 2018 resulting in a report that collated information from NRAs on the approaches to switching across different communications services²⁵. In November 2022, a joint workshop between BEREC and BEUC was organized for discussing the topic. A transparent and secure switching process contributes to market competition and strengthens the end-users right of choice. Various challenges were identified in this procedure, especially related to service interruption, compensation for delays or double billing together with problems in switching bundled services. BEREC believes that it would be worthwhile continuing investigating for further problems that might exist in the markets, as well as to tackle the best practices implemented among Member States.

The report will focus on the national implementations of the measures provided for by Article 106 of the EECC and, among others cover issues related to the details of the switching and porting processes, porting-failures and switching processes for bundles.

²⁵ (BoR (19) 27)

BEREC report on switching and termination of contracts will be adopted for public consultation at Plenary 4, 2025 and for publication at Plenary 2, 2026, together with the outcome of the consultation Summary Report.

BEREC-BEUC Joint workshop on end-user rights

EU WG - BEUC joint workshop will provide an opportunity to bring together regulatory bodies and civil society organisations, especially consumer organisations, to discuss all aspects that can potentially impact European consumers in a rapidly developing digital environment. It will cover the potential effects of consumer-relevant elements such as quality of service, coverage, information, and marketing practices. By engaging in this comprehensive discussion, the workshop seeks to identify actionable insights and policy recommendations or legislative changes, especially taking into account the BEREC opinion on Article 123 and EC views on the review of Title III of Part III on end-user rights that can empower consumers and strengthen their position in the digital marketplace.

External workshop to be held in last quarter 2025, workshop summary report will be adopted at Plenary 1, 2026.

BEREC Report on Virtual Worlds and Web 4.0

Virtual worlds are meant to have a significant economic and social impact by transforming the way online content and applications are accessed by means of immersive experiences. Virtual worlds are part of a wider technological change: the transition towards Web 4.0. The relevance of this trends has been acknowledged by the EU institutions.

This deliverable would develop on BEREC high-level position on artificial intelligence and virtual worlds that was provided as an input to the two calls for contributions on competition in generative AI and Virtual Worlds opened on 9 January 2024 by the European Commission. It would consider, among other issues, the underlying technologies supporting the virtual worlds and web 4.0, the interdependences among the different technologies, investments required, related environmental issues and potential competition and openness/standardization bottlenecks for their development, governance and enforcement matters as well as the impact on end-users' rights and inclusiveness.

BEREC Report on Virtual Worlds and Web 4.0 will be adopted for public consultation at Plenary 1, 2026 and for publication at Plenary 3, 2026. Adoption of the outcome of the consultation Summary Report is expected at Plenary 3, 2026.

7. Potential work for 2026 and beyond

In addition to the items described above, the items in this section will be considered for the Work Programme 2026 and beyond in future work programmes as candidates for preparing BEREC reports, opinions or analysis or organizing workshops. The list of items mentioned below are illustrative and is not intended to be an exhaustive or final list. BEREC will also consider other new workstreams for 2026, including those that will be brought forward by stakeholders in the different consultation phases. The list of project deliverables will be defined during the preparation of the 2026 work programme over the course of 2025. In order to ensure the highest level of quality of BEREC's outputs and the efficiency of work among expert working groups, the final number of projects should be kept moderate.

BEREC inputs to the regulatory framework review

BEREC will start in 2025 to provide the co-legislators and the public with various inputs contributing to the review of the functioning of the EECC, in an ad hoc manner so that the inputs are timely and topical following the debate in 2025. It is well expected that the EC will publish an assessment of the EECC functioning in late 2025, possibly followed by a package of proposals which shall then be analyzed by BEREC in 2026. BEREC is committed to provide fact-based inputs in the remit of knowledge of its member NRAs.

BEREC contribution to the review process of the Recommendation on relevant markets susceptible to ex ante regulation

According to Article 64 of the EECC, the European Commission shall review the Recommendation on Relevant Product and Service Markets on a regular basis. The European Commission plans to update the current Recommendation (adopted in 2020) as per Article 64 (1). When doing so, the European Commission must take into utmost account the BEREC Opinion on this Recommendation.

To ensure an appropriate input, BEREC will conduct a series of activities as an information collection for providing the required BEREC Opinion that should comprehensive and contribute to the benefit of the competitive landscape in the EU (and Europe as a whole).

BEREC contribution to the implementation of the Data Act

BEREC has already been contributing to topics related to the Data Act in the past by producing a variety of deliverables.

The Regulation requires the competent authority responsible for the application and enforcement of Articles 23 to 31 and Articles 34 and 35 to have experience in the field of electronic communications services. Several BEREC members may be designated as (one of) the national competent authority responsible for the application and enforcement of the Data Act's provisions on switching between data processing services and BEREC's insights could also be valuable for the preparation of the implementing and delegated acts that the European Commission is required to adopt under this regulation.

BEREC's contribution would be particularly relevant, for instance, in relation to switching between data processing services (such as cloud and edge services), the monitoring of switching charges, interoperability, or complaints handling, IoT and more generally concerning the impact of such services and the Data Act obligations on the electronic communication

sector. BEREC contribution could take different forms (opinions, workshops, knowledgebuilding, exchange of best practices, report, etc.).

Facilitating copper network switch-off

BEREC will continue its work on copper switch-off. How switch-off and migration from copper to fibre networks are managed will be key for Europe to achieve the 2030 connectivity targets. The BEREC work will build on the existing BEREC reports on the topic, such as the progress report on managing copper switch-off, which went for public consultation in December 2024 and be finalized in June 2025, BEREC will continue to monitor closely this subject, to ensure that the migration and copper-switch-off process will be as swift as possible without sacrificing competition or end-user rights.

BEREC input on connected and automated mobility

Connected and automated mobility has great potential not only to gain efficiencies in users' mobility and foster the economic growth (including not only logistics but related fields such as data markets or mapping) but also enable increasing road safety and reduce the impact of a very environmental demanding industry.

Connected and automated mobility is one of the priorities of the EU. The European Commission is working on the development of 5G corridors to enable seamless automated mobility across the EU.

BEREC's input could discover the relevant technologies involved and their current development in the EU, possibly comparing such development with the other geographical areas. It could also identify any connectivity investment gap or other bottlenecks that could hinder their deployment in the EU. It could identify possible business cases for electronic communications providers in this field.

Further work on 5G cybersecurity

BEREC continues to work with the NIS Cooperation Group and the European Commission in developing and implementing the recommendation of the EU Toolbox for Cybersecurity of 5G Networks. As a follow-up to the Nevers Call, the European Commission and ENISA published a report on the cybersecurity and resiliency of Europe's communications infrastructures and networks. In the 'Nevers Call', BEREC has been invited together with ENISA and the NIS Cooperation Group, with the European Commission, to formulate recommendations, based on a risk assessment, for the Member States and the European Commission in order to reinforce the communications networks and infrastructures' resiliency within the EU, including the implementation of the 5G toolbox.

BEREC will continue to work closely with the NIS Cooperation Group as well as with ENISA, ECASEC and the European Commission on topics related to the resilience of communication networks as foreseen in the Nevers Call in order to draft recommendations, support development and deployment of best practices and provide guidance, as needed. Apart from issues related to the 5G security and cyber security which BEREC is addressing already, greater emphasis should be put on defining best practices for the resilience and redundancy of national electronic communications networks, including the trunk networks, backbone networks for fixed and mobile networks. Depending on the outcome of the mapping exercise of existing competences of BEREC's NRAs with respect to cyber security and resilience of communications networks BEREC will consider to develop a toolbox of best practices for NRAs. In order to improve the resilience of communications networks, BEREC would also carry out an analysis of possible state aid measures to improve the resilience as well as assess the impact of increased resilience requirements on the market players. BEREC will follow developments in the legislation particularly in those regulations that directly or indirectly apply to electronic communication network operators (CER, NIS2, CSA, CRA and Cyber Solidarity Act) and developments in the standardisation entities (eg. 3GPP, ETSI, ITU).

Workshop and Report on practices for ensuring equivalence of access and choice with respect to accessibility

The aim of the Accessibility Act is to harmonize accessibility requirements for products and services by eliminating and preventing barriers to the free movement of certain accessible products and services, arising from divergent accessibility requirements and different stages of preparatory activities in Member States. Although the BEREC workshop on end-users' rights held in April 2024 proved to be a valuable forum for sharing views and concerns related to accessibility (one session was dedicated to this topic), further BEREC focus on the matter is crucial in order to prepare for the implementation of the requirements stemming from European Accessibility Act (EAA). The activities for this workshop could start in 2026 and it would serve as an initial input for the report.

The report would build as well on the work done by BEREC in 2015, 2017, and more recently in 2022, resulting in the BEREC Report on measures on equivalent access and choice for disabled end-users, which collated information from NRAs to create an inventory of measures and initiatives that NRAs have in place to ensure equivalence of access.

This benchmarking report would identify the solutions in place throughout the Member States to meet the accessibility requirements established in the EECC and in the EAA, which comes into force on 28 June 2025.

In order to ensure that the report takes a strategic view of the measures taken, in addition to seeking information from NRAs, BEREC may also call for input from key stakeholders regarding any measures provided independently from those prescribed by the NRAs under other relevant consumer legislation. The role of NRAs in ensuring the accessibility requirements in electronic communications would also be elaborated.

Exploration of the concept of Digital Sufficiency

Digital technologies are energy and resource intensive with their total electricity demand (production and use) accounting for 8-10% of worldwide electricity consumption. While the efficiency of ICT devices and systems is improving, the gains in efficiency are often offset by increased use. A call for digital sufficiency strategies and policies has been made in response, promoting the design of longer lasting services and the control of complexity and resource use. Such strategies aim at producing fewer devices while ensuring their lowest possible energy consumption. Digital sufficiency also addresses software to minimise data traffic and hardware use. User sufficiency is also important, because it promotes a more frugal approach to using digital technology. Finally, economic sufficiency can also be part of digital sufficiency as it views digitalisation as supporting the transition to production and consumption that remain within the planetary boundaries and avoid unbound growth.

The concept of Digital Sufficiency is a topic that BEREC might explore in its future work and exploit any synergies that might emerge with planned BEREC work.

Update to BEREC Guidelines on Geographical surveys of network deployments

In the years 2020 and 2021, BEREC published three 'Guidelines on Geographical surveys' based on Article 22 of the EECC on the mapping of broadband network deployments²⁶. In Article 1.5 ('Guidelines Revision'), BEREC committed itself to prepare an Implementation Report "to examine how different Member States have transposed and enabled the Article 22 provisions". BEREC carried out the Implementation Report ²⁷ BEREC in its 2024 Work Programme and evaluated whether to revise and update the Guidelines. Arising from the Implementation Report, BEREC considers that it is appropriate to propose certain revisions and updates of the Guidelines. It is possible that this work will be finalised in 2026.

Call for Inputs (CFI) on interfaces to mobile networks for developers and thirdparty services

Observing that the GSMA introduced the Open Gateway initiative, with the goal to provide an Open standard API to (mobile) network functionalities that can be used by app makers, this work item aims to explore the status of this initiative.

BEREC's interest includes, amongst others, exploring different deployments, the challenges with potential impact for markets and end users, keeping uniform interface for all MNOs and MVNOs (worldwide), aspects for avoiding vendor or operator lock-ins, etc. Other aim is to get a view on the maturity of use cases and examine their impact on the configuration of mobile networks including how these kinds of functionalities operate in the context of (Pan-European) slicing (for instance harmonizing slicing features between operators and EU countries).

BEREC will issue a call for input and will publish the responses received as this information may valuably contribute to future work in this field.

Report on IoT

In 2023, BEREC organised a workshop with the twofold purpose of reviewing the state of play of IoT services and discussing emerging regulatory/competition challenges for IoT services, considering regulatory matters such as the call for removal of barriers for the provision of machine-to-machine communication included in the Roaming Regulation.

Given the regulatory developments and in view of IoT services technological progress, a review of the IoT report seems to be useful.

Potential Role for NRAs under the Artificial Intelligence Act (AIA)

The Parliament adopted the Artificial Intelligence Act in March 2024 and the Council followed with its approval in May 2024. It will be fully applicable 24 months after entry into force. Some NRAs have already been assigned or may be assigned responsibilities – even in a supporting role at national level - under the AIA. It may be beneficial to hold a workshop to allow NRAs to discuss the implementation of the AIA in the second half of 2026 or later.

²⁶ BoR (20) 42 published in March 2020, BoR (21) 32 published in March 2021 and BoR (21) 82 published in June 2021.

²⁷ BoR (24) 146

Potential Role for NRAs under the Gigabit Infrastructure Act (GIA)

The Gigabit Infrastructure Act (GIA) responds to the growing needs for faster, reliable, dataintensive connectivity, replacing the 2014 Broadband Cost Reduction Directive. A political agreement was reached in February 2024 and the Gigabit Infrastructure act (GIA) entered into force on 11 May 2024. It will be fully applicable in November 2025. By then BEREC will publish Guidelines regarding the coordination of civil works and access to in building infrastructure. In addition, BEREC was required to provide an input to the EC guidance regarding the application of the article 3 of the GIA. This and other work may also arise in 2026 with respect to the GIA implementation.

Follow-up work on Submarine cables connectivity in Europe

Based on the external study commissioned by BEREC on Data Centers as part of its 2025 Work Programme, BEREC may also analyze the relation between these and the deployment of submarine cables, and carefully look to the strategies of the different stakeholders that invest in one or in both businesses to better understand their key characteristics and dependencies. BEREC's analysis of data centers' connectivity dependencies provides an opportunity to underline the importance of high-capacity and low-latency routes for resilient data flows, key for Europe's digital economy and data sovereignty.

BEREC plans to publish a report on the relation between data centers and the deployment of submarine cables in 2026, which will be subject to public consultation. This report may also feed the planned report on submarine cables, as submarine cables and data centers are increasingly related.

Follow-up work on the impact of Al on user experiences on the internet and on the environment

As set out above in chapter 6, BEREC envisages that its work on AI can take different forms.

In addition, as highlighted in BEREC High-level position on artificial intelligence and virtual worlds (BoR (24) 68), AI has the potential to enrich user experience and complement traditional ways of accessing online content and services. However, AI can also affect the overall user experience on the internet as it has the potential to directly influence the way users access online content/services and thus to possibly affect their freedom of choice or cause other concerns related to data privacy and competition.

Moreover, BEREC has also stressed the relevance of taking into account the environmental footprint of AI, in particular its electricity consumption. BEREC may produce an opinion or a report to further analyze these issues.

Opinion for the evaluation of the application of Regulation (EU) 2015/2120 in 2026 as input to the Commission's report

Art. 9 of the Regulation (EU) 2015/2120 states: "By 30 April 2019, and every four years thereafter, the Commission shall review Articles 3, 4, 5 and 6 and shall submit a report to the European Parliament and to the Council thereon, accompanied, if necessary, by appropriate proposals with a view to amending this Regulation." Thus, the next review is due by 30 April 2027. BEREC might have to provide an opinion for the evaluation of the application of

Regulation (EU) 2015/2120 in 2026 as input to the Commission's report and provide input to any potential future legislative proposal in this field.

Internal workshop to assess the need to review BEREC Guidelines for QoS parameters

Guidelines are due for review every two years. The last revisions were in 2024. The assessment in close cooperation of EU-WG and OI-WG in 2026 should respond to the question of whether there is a need for formal review of the Guidelines.

Advancing towards environmental data collection on ECN/ECS and contributing to future code of conduct on ECN/ECS sustainability

Since 2020, BEREC has built a growing expertise especially regarding transparency mechanisms and sustainability indicators. Building on its 2023 Report on Sustainability indicators for ECN/ECSs, its 2024 workshop on telecom regulators' role in this regard and the European Commission's study on "identifying common indicators for measuring the environmental footprint of electronic communications networks", BEREC will continue its work on sustainability indicators in 2025 and into 2026. Various deliverables could be expected throughout 2026. BEREC will work on establishing the grounds for ad hoc data collection from the market players on the implementation of key sustainability indicators via questionnaire through the NRAs. The final report will analyse sustainability indicators set by NRAs and those recommended by the European Commission. This ad-hoc data collection will also enable NRAs to share expertise in terms of methodologies and to reach a level of harmonisation in terms of definitions of the main indicators relevant for ECS/ECN sustainability.