

ETNO Reflection Document on the Communication from the Commission to the Council and the European Parliament on the Review of the Sustainable Development Strategy

ETNO (European Telecommunications Network Operators' Association) is the principal policy group for European electronic communications network operators. The Association welcomes the Communication from the Commission on the review of the European Sustainable Development Strategy proposing, in which a number of key actions are proposed for the coming years. ETNO stresses that in its view the Sustainable Development Strategy will be a major element of success for the renewed Lisbon process and that, for this reason, the involvement of all major stakeholders will be crucial. As the recognised voice of the European telecommunications network operators, ETNO is committed to contribute to this process which is fully consistent with the Sustainability Charter launched by the Association in 2004.

The present Communication being closely linked to the Guiding Principles adopted in June 2005 by the Council, ETNO presents following comments on both documents. The Association broadly supports both documents.

1. Precautionary Principle

Technological developments and ICT in particular, are playing an important role in protecting people's safety, delivering advanced healthcare and improving the quality of life while increasing life expectancy and protecting the environment. Nevertheless, such rapid developments together with societal change have also produced an increasing variety of emerging issues and circumstances whose consequences are partly unknown and difficult to predict. It is our understanding that, pursuant to the precautionary principle, Public Authorities will implement risk evaluation procedures and adopt provisional and proportionate measures in order to prevent damage which,

although uncertain in light of the best available scientific knowledge, might affect the environment in a severe and irreversible way.

2. Sustainable Mobility

Rather than “sustainable transport”, ETNO advocates considering the broader vision of “sustainable mobility” since, as it is rightly pointed out in the Communication, a number of ICT solutions exist that can provide a very efficient alternative to physical transportation and therefore mobility can be achieved with much lower economic, social and environmental impacts. Teleworking, videoconferencing and audio conferencing are some of such possible alternatives: tailored to fit any organisation’s needs and objectives. They can increase efficiency and reduce social and environmental burdens. ETNO would strongly encourage the European Commission to further work with the relevant stakeholders on the benefits of adopting a complementary approach between the traditional transport services and the newly available e-services. Furthermore it should be considered that, when no e-replacement is feasible, transport and traffic in general can be made more efficient exploiting both existing and/or properly tailored solutions based on ICT.

3. New Working Environments

The Communication stresses the vital need to maintain the employability of workers and the necessity to implement effective life long learning strategies, especially when the EU faces the challenges of an ageing society. On the other hand in a global knowledge society, it is important to support teamwork within and across the boundaries of organizations. The new strategic framework of i2010 promotes for those reasons an open and competitive digital economy and emphasises the role of ICT for innovation in the work place. ETNO therefore suggests that in the coming 7th Framework Programme, due consideration is given to research in New Working Environments to retain the momentum gained in 6th Framework Programme.

4. e-Waste

With the rapid technological changes, one of the main challenges for the coming years will be the risk of proliferation of e-waste. ETNO supports the approach taken by the Commission to encourage integrated product policies and standards, environmental management schemes and innovation and technology policies. ETNO invites the Commission to favour the reuse of equipment. On this issue, the successful take-back schemes of used mobile phones currently in place in the majority of Member States were implemented on the initiative of the business community and are good examples of a sustainable development policy. These schemes aim at making better use of the life cycle of the products,

thus minimizing resource consumption, contributing to bridging the digital divide, allowing underprivileged users notably in developing countries to have access to the technology, whilst performing a sound environmental management of the associated wastes.

5. Mobilising stakeholders

ETNO considers that a key factor of success for a Sustainable Development Strategy is the implementation of partnerships between the relevant stakeholders. Taking into consideration the global nature of the challenge, ETNO is already engaged with WWF in the field of promoting the use of ICT for combating climate change. The Association is a member of the Global e-Sustainability Initiative (GeSI) that deals in particular with supply chain issues, sustainability reporting and combating climate change. ETNO would be happy to contribute to any reflection which would be initiated by the Commission on Sustainable Development and Corporate Responsibility issues.

ETNO supports the idea of rewarding the best sustainable development initiatives, but would suggest not to limit such awards to regional and local authorities, however important their role is, and to extend this recognition to all stakeholders that demonstrate real commitment by taking adequate action.