



**CWG-Internet Open Consultation:  
The Environmental Impacts and Benefits of the Internet**

Submission of the U.S. Council for International Business  
December 8, 2021

The U.S. Council for International Business (USCIB) is pleased to participate in the CWG-Internet's Open Consultation, "The Environmental Impacts and Benefits of the Internet." USCIB is a trade association composed of more than 300 multinational companies, law firms, and business associations from every sector of the U.S. economy, with operations in every region of the world. In particular, USCIB Members include a broad cross-section of the global companies in the information and communications technology (ICT) sectors as well as leading users of ICTs. We welcome this opportunity to offer a multi-sectoral perspective on this very timely issue.

We note that USCIB tackled the question of how existing and emerging digital technologies may be mobilized to address climate change as part of the [2020 Internet Governance Forum \(IGF\)](#). Specifically, this workshop, "[Tech for the Planet](#)", explored how technologies that have enabled and sustained the digital transformation of the economy have been leveraged to mitigate damage to the environment and reduce the carbon footprints of consumers, business, and governments. The IGF published a [workshop report](#) that provides a useful summary of the key policy questions and recommendations resulting from the workshop that may be useful to the ITU CWG-Internet as part of this consultation.

Data Collection and Data Flows -- It goes without saying that the Internet has enabled the continued innovation of digital technologies and their transmission to address a broad array of environmental challenges. In terms of improving the impact the Internet has on the environment and taking advantage of its potential to help address climate-related issues, experts have underscored the importance of data collection and appropriate Internet platforms and technologies (e.g. Artificial Intelligence) to house, understand, analyze and aggregate data to address specific environmental challenges.<sup>1</sup>

In addition, the OECD noted that "*...transborder data flows can also facilitate collaboration between governments to improve their policy-making at international level. They can help strengthen collective commitment and efforts across borders to support greater public sector transparency, contribute to addressing global challenges as defined for instance by Sustainability Goals (SDGs)...*"<sup>2</sup>

Accordingly, it is increasingly important that global policy makers recognize that criticality of the free flow of data across borders, subject to legitimate security and privacy concerns.

Policies and regulations that impede cross-border data flows or mandate the localization of data undermine the potential to tap Internet-enabled technologies to address environmental challenges.

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<sup>1</sup> See [Report](#) for 2020 IGF Workshop, *Tech for the Planet*.

<sup>2</sup> [Mapping Approaches to Data and Data Flows](#), OECD, 2020 (p.10)

Harmonized and Complementary Standards – Experts have underscored that both technical and corporate standards are needed to ensure both technology interoperability and access to and use of the Internet as a transmission mechanism as well as to promote “green” best practices.<sup>3</sup> Each set of standards complements the other, it has been emphasized. Such corporate standards would complement the technical work underway in non-governmental international standards-setting bodies like the ISO and IEEE, both of which are helping to ensure interoperability of digital technologies designed to reduce carbon or protect oceans, rivers, or other water sources.

Accordingly, USCIB strongly encourages governments to support policies that allow the free flow of data across borders, subject to legitimate security and privacy concerns. Harmonized technical standards are best realized through existing international standards-setting bodies, such as the ISO and the IEEE, not through top-down governmental mandate. The promotion of common corporate standards should be encouraged as part of a broader, cross-sectoral effort by business to realize COP 26 climate change goals.

Multistakeholder Approach – USCIB has emphasized in statements before various global forums that the multistakeholder model for Internet governance continues to be the best method to enable whole-of-society/whole-of-government consideration of Internet policy issues that is grounded in democratic values and the principles of transparency, accountability, and consensus. Given the rapid pace of technological change, governments need the perspectives provided by business, the technical community, and civil society to better understand what policies are commercially viable, technically feasible, offer adequate user protections, and avoid unintended consequences. The contributions of all stakeholders produce a flexible policy environment critical to empowering the rapidly evolving digital economy.

The highly disruptive impacts of environmental degradation suffered by people throughout the world makes such multistakeholder participation even more important to ensure that the Internet functions in a stable, secure, and resilient manner to facilitate technology solutions to climate change. Governments play an important role as they set and agree on regulation, legislation, and international treaties and agreements that address environmental challenges. Local nongovernmental organizations representing civil society are essential participants as they are effective in furthering the understanding of governments about local culture and related concerns. The business voice is critical to inform deliberations about what is technically feasible and commercially available. The synergy of the multi-stakeholder process is needed to bring all parties together and achieve maximum impact.

Examples of Internet-enabled Innovations – The following are examples of how business is using or promoting the development of digital technologies, including through partnerships with customers and other third parties, to help mitigate the environmental challenges threatening our planet:

- [Amazon’s Sustainability Data Initiative \(ASDI\)](#) – ASDI seeks to accelerate sustainability research and innovation by minimizing the cost and time required to acquire and analyze large sustainability datasets. ASDI works with scientific organizations, such as NOAA, the UK Met Office, NASA, and Government of Queensland to host and make available key datasets, including weather forecasts, climate projection data, satellite imagery, hydrological data, air quality data, ocean forecasts and more. Through ASDI, this data is publicly available to anyone and is enabling research and action around the world. For example, the [Digital Earth Africa](#) is leveraging ASDI to

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<sup>3</sup> 2020 IGF Workshop [Report](#), Tech for the Planet, *op. cit.*

analyze petabytes of satellite data to make decisions about land degradation, climate change patterns, agricultural production and severe weather trends that lead to community displacement.

- [AT&T's Connected Climate Initiative](#) -- At AT&T, the connectivity we provide is part of the solution to addressing climate change, helping to reduce the footprint of our corporate operations as well as that of our business customers. This is our role to play in supporting the transition to a net-zero economy. We know our 5G and other broadband connectivity solutions can help our business customers, including major global enterprises, drive emissions reductions at scale, especially in industries that currently have large carbon footprints such as energy, transportation, industry and agriculture. It is with this in mind that we established our Gigaton Goal – aiming to **enable a gigaton of emissions reductions** through connectivity solutions for our business customers by 2035. We will achieve this goal through the Connected Climate Initiative (CCI), where we'll collaborate with leading technology companies, AT&T Business customers, universities and environmental nonprofits. Through the CCI, AT&T plans to expand businesses' use of broadband-enabled climate solutions, including 5G, by identifying best practices, exploring new product ideas and use cases, and scaling the innovations of startups.
- [Lumen Technologies Platform for Amazing Things](#) - Lumen's Platform for Amazing Things helps customers reduce their energy consumption by enabling smart technologies, dematerialization and virtualization. We align our Lumen Platform with our customers' goals to reduce the effects of climate change with the goal of attracting more customers by communicating our success in supporting these energy consumption reduction technologies. Examples of how the Lumen Platform is helping our customers reduce their environmental impact include:
  - We work closely with our customers to enable IT architectures that reduce both costs and carbon footprint. As we help our customers digitally transform their businesses and move applications to the cloud, we believe our solutions reduce energy consumption and optimize resource utilization for their IT environments.
  - The growing suite of Lumen Edge Computing services enables a range of solutions that our customers can use to improve their sustainability. From fleet maintenance and the development of autonomous vehicles in the transport sector, to reducing manufacturing waste and resource consumption in the agriculture sector, Edge Computing allows customers to acquire, analyze and act on data at the location where it delivers the most value.
  - Remote energy management through Lumen Smart Home allows customers "anywhere management" of thermostat settings and the ability to preprogram efficient energy practices such as turning lights on or off at specific times.
  - Minimization of carbon footprints through Lumen's solutions, such as VoIP, that reduce the need for business travel have also enabled businesses to improve resiliency during the COVID-19 pandemic and improved the safety of business operations across a broad range of industries.
- [Mastercard's Priceless Planet Coalition](#) -- Mastercard leverages its vast network (2.6 billion cardholders worldwide) to educate consumers on climate change and helping them to make

meaningful choices. In particular, Mastercard has launched an initiative called 'Priceless Planet Coalition', which unites different actors to address climate change by planting of a hundred million trees over five years. Mastercard also developed an App to make it easier and safer for people to make donations to climate issues.

Again, USCIB welcomes this opportunity to highlight the proactive and innovative roles business has assumed in adapting technologies in a manner that furthers environmental conservation goals and saving the planet.