**We are FairTEC!**

A collective group of actors committed to digital sobriety. We are working together to offer credible and sustainable alternatives in order to create a paradigm shift.

We are comprised of 7 different organisations:

**Commown:** A cooperative electronics rental service. Commown will never sell a smartphone and guarantees to do everything possible to repair and (re)rent them for as long as possible.
**Fairphone:** A Dutch social enterprise that manufacturers smartphones to protect people and the planet.
**/e/OS:** An open-source operating system that respects end-user privacy and is compatible with your everyday mobile applications.
**Neibo:** A Belgian cooperative telecom operator whose profits are donated to sustainable, ethical and local projects.
**Telecoop:** A French cooperative telecom operator that encourages digital sobriety and fair profit sharing between employees, shareholders and public interest.
**Your Co-op Mobile:** A British cooperative telecom operator focused on member benefit and reward whilst offering low carbon utilities such as green energy (Community Power), broadband and mobile services.
**WEtell:** A German mobile service provider offering a 100% eco-friendly, fair, transparent and data secure service.

We believe that it is important to respond to the European Commission's consultation on "Sustainable consumption of goods - promoting repair and reuse" and we are excited to have the opportunity to do so.

It is a fact that when consumers use their electronic devices for longer, fewer new products are created, conserving materials and energy. Longevity and repairability are fundamental to this equation.

Longevity and repairability can be implemented via a number of means, and supported by multiple pillars.

**The European public**

Any legislation centered around design inevitably leads to the creation of new products. Any initiative wanting to promote the sustainable consumption of goods must therefore first promote the usage, and support the longevity, of the items we already own. In support of this sentiment, we propose the following measures:

- As is mandated within the alcohol and tobacco industry, we propose educational transparency regarding the social and environmental impact, and consequences of the electronic industry. Specifically, we propose promoting awareness of

the impacts of manufacturing, and encourage moderate use of smartphones.
- We propose the introduction of a tax weighted by the warranty and life cycle of a smartphone device. We also propose lower VAT weighting for used or repaired hardware. This would encourage users to consider purchasing used hardware over new hardware, boosting the circular economy.

## Manufacturing - hardware

- We support the establishment of uniformity in the construction of smartphones. This implies easier access for the user to the different components, which facilitates the disassembly and assembly of devices. This would democratise access to repair services, which are still an exclusivity of brands. It would also improve the longevity of our products.
- We support a commitment to a period of availability of spare parts by the manufacturer.
- We support the introduction of checks on manufacturers and service providers to verify the implementation of the above measures.

## Manufacturing - software

- We support extending the number of software updates issued to devices. Ideally, a phone should receive software updates, security patches and bug fixes for at least 5 years. This would help prevent software obsolescence.
- We support making an unlockable and relockable bootloader a mandatory provision. The bootloader is a special system used by the hardware when starting your phone; it tells the hardware what system to load. A locked bootloader prevents the owner from truly owning their machine and changing the default operating system to another of their choice. This would democratise access to alternative operating systems, which respect their users' privacy by not collecting personal data and promote digital sobriety by increasing the longevity of devices (by providing updates after the device manufacturer ceases to support the default OS.)
- Consequently, we would prohibit any practice that aims to limit installing any compatible operating system, other than the one preinstalled, as well as any practice that aims to lock users and app developers into using one OS, with associated applications or cloud services.
- We support promoting practices that aim to increase interoperability and portability.
- We support promoting practices that improve users' privacy.
- We support promoting the use of open technologies to improve collaboration and auditable privacy.

## Telecom operators and electronic resellers

- Telecom operators should extend VoLTE and VoWi-fi support to all compatible phones, as old 2G and 3G networks are retired with the 5G roll out. Currently VoLTE and VoWi-fi are limited to a handful of devices, forcing people to retire fully working devices.
- Telecom operators must deal with their carbon footprint and develop an economic interest in consuming "less". We support the use of recycled or reconditioned antennas and the replacement of old equipment with more energy-efficient equipment.
- However, recycling initiatives should not act as commercial levers to entice users to buy a new phone. We propose that telecom operators and electronics resellers only offer commercial value for recycled devices if they are older than 2 or 3 years.
- Telecom operators must be prohibited from linking the payment period for purchased hardware to the term of mobile phone contracts. This practice is used to tie people into long-term contracts by offering new devices when airtime contracts end. In this way, hardware consumption increases, and customer dependency is generated.

**Final Word**

FairTEC and its members welcome further consultation and feedback. We exist to drive positive impact and invite you to approach us and collaborate to create change together!

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13150-Sustainable-consumption-of-goods-promoting-repair-and-reuse_en