

Comments from

The International Amateur Radio Union (IARU)



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The IARU represents national amateur radio societies and their members in over 100 countries which include Member States of the European Union (EU) as well as the European Economic Area (EEA). The on-air activity of the millions of Individual radio amateurs are undertaken under a top level framework that stems from the ITU amateur and amateur-satellite service frequency allocation. Self-training and re-use of equipment is deeply engrained in amateur radio, and we also note that the ITU itself is equally concerned with e-Waste from telecoms equipment 0.

IARU members regularly utilise smart-phone and tablet applications to obtain increased functionality to support amateur radio usage. The national members of IARU Member Societies would therefore welcome regulations to make smart-phone and tablet devices more sustainable. IARU observes that the life of smart-phones can be limited by battery performance, often to a period of the order of 2-3 years. Furthermore tablet life can be curtailed by withdrawal of or lack of manufacturer support for operating system versions which support updated applications. Indeed we note that some low cost crossovers between tablets and laptops have embedded unjustifiably short automatic expiry dates.

As radio amateurs our members strive to re-purpose such devices for experimental use or other innovative uses in the amateur service, thus extending their useful lives.

Older devices such as mobile phones and tablets already find opportunities for reuse in the Amateur Radio community, including for emergency response support. Provided they have Wi-Fi capability they are able to run VoIP and other clients to connect to emergency data networks to provide telephone, information and email services to users in need. Such functionality supports the important Amateur Radio tradition of repurposing commercial equipment for our use and prolonging its useful life.

While conscious of the Cybersecurity environment that exists particularly with increased connectivity of devices through the Internet of Things (IoT), as an organisation IARU is concerned that regulation in this area could in practice constrain the sustainability of devices and deprive independent actors from refurbishing and or repurposing equipment.

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[1] <https://www.itu.int/en/action/environment-and-climate-change/Pages/ewaste.aspx>