

GISAD statement on <u>https://ec.europa.eu/info/law/better-regulation/have-your-say/initia-tives/13413-Digital-fairness-fitness-check-on-EU-consumer-law_en</u>

GISAD (Global Institute for Structure relevance, Anonymity and Decentralisation i.G.) is an institute in founding. GISAD wants to develop a digital system (EU-D-S) from the perspective of the citizens of Europe, which can hold its own in system competition with gatekeepers and a social credit system.

The aim of GISAD is to support the creation of a holistic Marshall Plan, as called for by the President of the European Commission, Ursula von der Leyen. The core of the Marshall Plan must be a digital concept adapted to civil rights and diversity. If individual measures are taken without an overall system of their own, Europe runs the risk of losing the system competition to other economic areas such as a centrally controlled China.

• GISAD's opinion is subject to the proviso that it is to be as part of an overall digital concept understood (multiple use of the same infrastructure without additional costs).

GISAD has defined three goals on which a Marshall Plan should focus:

- 1. The optimal refinement and simple exploitation of digital data, while maintaining diversity and performance-adopted involvement of all parties involved in the value creation.
- 2. The stigma-free, lifelong digital inclusion of all citizens with incentives for self-development.
- 3. The digital guarantee of the necessary state tasks to maintain security for citizens, the economy and the state, while preserving pre-digital democratic achievements.

Challenges:

GISAD welcomes the intention of the EU Commission to improve digital fairness. However, ever more detailed regulation is not conducive to achieving the goal, but rather increases the administrative burden. In addition to the actual product characteristics, the information assigned to a product plays an increasingly important role in consumer abuse. It is not just about legislation, but about a holistic concept that largely prevents mis-information and strengthens the critical consumer.

Companies compete in digital markets by using digital tools from other companies that produce content as automatically as possible.

Misdirection of the consumer is inherent in the system. Consumers must learn to evaluate products objectively. Consumer information is not fundamentally different in handling from the evaluation of other information. This does not refer to educational initiatives, but to procedures of human-machine interaction, which all new information available on the internet goes through.

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Against this background, GISAD proposes the following measures:

- High-quality consumer information requires the commitment of a broad section of the population to refine data.
- Decisions should always be made by a group, in case of doubt by several groups in a multi-stage evaluation process.
- Additional state benefits such as social assistance, short-time working allowance but also pension increases should be linked to a manageable obligation of digital participation in the form of data assessment.

