

Ms Ursula von der Leyen
President

Ms Teresa Ribera
Executive Vice-President - Clean, Just and Competitive Transition

Ms Henna Virkkunen
Executive Vice-President - Tech Sovereignty, Security and Democracy

European Commission
Rue de la Loi 200
1049 Brussels Belgium

29 July 2025

Subject: DMA - Time for the European Commission to Blow the Final Whistle on Apple

Dear President von der Leyen, Executive Vice-President Ribera, Executive Vice-President Virkkunen,

We are the Coalition for App Fairness (CAF), an independent nonprofit organization founded by digital innovators to advocate for freedom of choice and fair competition across the app ecosystem. Originally formed by Basecamp, Blix, Blockchain.com, Deezer, Epic Games, the European Publishers Council, Match Group, News Media Europe, Prepear, Proton, Skydemon, Spotify, and Life360, CAF has rapidly grown from 13 to more than 80 members since launching in September 2020.

We write to express our dire concern over Apple's blatant refusal to comply with, and promptly and effectively implement, the Digital Markets Act (DMA).

On 26 June, days before its workshop with the EC about compliance, Apple unveiled its latest set of terms, following the European Commission's non-compliance decision and fine announced on April 22. Just like all of Apple's other proposals, this latest proposal is non-compliant and seems to be offered in defiance as this gatekeeper continues to exploit its monopoly power and thwart innovation and competition. Indeed, if one adds up the new fees Apple has proposed, they are almost identical to the fees charged before the DMA was enacted – Apple's proposed fees are the same amounts with new names.

Apple's sham compliance is not just a calculated deception - it's illegal. By deliberately ignoring the European Commission's clear ruling from April, Apple is doubling down on its defiance. Any developer that dares to direct customers to make purchases outside the App Store will face new restrictions and new fees that violate the Digital Markets Act. This is a calculated move to preserve its market dominance, stifle innovation, and push higher costs onto consumers.

Apple has already rolled out the solution, but only in the US. While the company defies EU regulators by breaking the law that has bound its conduct for 18 months, in the US, a judge recently forced meaningful change – albeit with a contempt order and a referral for

criminal prosecution. As a result, Apple changed its terms so developers can freely transact with consumers, offering more choices and information, easier purchasing, and lower prices.

Instead of standardizing steering rights granted to developers in the U.S., Apple has decided to mock the Commission by intentionally flouting DMA requirements.

In the meantime, **European consumers are paying the price of Apple's behaviour.** They are still stuck with Apple's anticompetitive, anti-innovation, and non-compliant conduct.

In addition, **developers are punished if they operate in Europe.** Apple currently gives US developers more freedom while keeping European innovators in a chokehold. This is killing European digital entrepreneurship, and creating a needlessly bifurcated App Store experience for any developer or consumer not located in the U.S.

The EU once set a global precedent for app store competition reform, and has now fallen behind—but now is time for the EU to catch up. The DMA was designed to ensure fairness, foster competition, and empower consumers. Those objectives remain unachievable as long as Apple is allowed to exploit administrative processes to delay compliance with impunity.

The European Commission must now treat Apple's plan for what it is: a direct challenge to its authority and to a democratically adopted law. We call on the European Commission to use all possible tools in its DMA enforcement kit, including issuing a specification decision. If Apple's non-compliance is still an issue, it should impose maximum fines. **Once again, breaking the law should no longer be a profitable business strategy.**

We trust in your commitment and stand ready to work together towards a fair and competitive digital market where innovation thrives and European consumers and small businesses face a fair marketplace.

Sincerely,
The Coalition for App Fairness