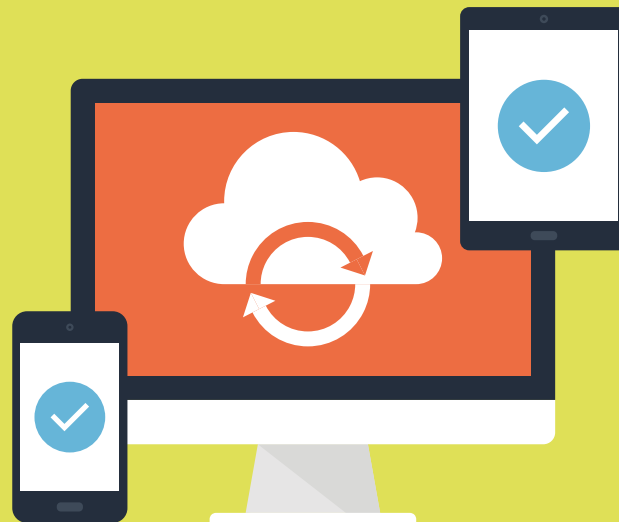


A Consumer-Driven Digital Single Market

BEUC Strategy



The Consumer Voice in Europe



Trust



Choice



Protection

Introduction

The European Commission's [Digital Single Market](#) (DSM) strategy is its [flagship initiative](#) to “make the EU’s single market fit for the digital age”. This strategy is of major importance for European consumers and the digital economy as it addresses critical bottlenecks for a well-functioning market.

The online environment is at times complex and technical. Consumers often find it hard to navigate, to understand their options and their rights, and to find solutions when things go wrong.

It is crucial that three fundamental aspects of consumer engagement and empowerment in the digital market are guaranteed: **trust**, **choice** and **protection**. Until these three founding pillars of EU consumer policy are secured, the Digital Single Market will not succeed.



Strengthening consumer **trust** in the Digital Single Market is a challenge that needs to be tackled on multiple fronts. Consumers need to benefit from a **high level of protection within an efficient, enforceable legal framework**. They also need easy **access to digital content** such as music, software, audiovisual content and ebooks **under fair conditions**. This requires a profound reform of the existing copyright regime. Last but not least, in an era when personal data is regularly collected and used by traders without consumers’ awareness, they need **efficient protection mechanisms to uphold their fundamental right to privacy**. Consumers must be put in control of their personal data by inter alia ensuring that products and services are designed by default to respect EU data protection rules.



The second fundamental pillar for a consumer-driven Digital Single Market is **choice**. This includes the **choice of goods, services and digital content; platforms and traders; payment methods; delivery operators; and internet access providers**. Despite the dynamic nature of the online ecosystem, power concentration and **anti-competitive practices are common and must be tackled** in order to safeguard the unparalleled levels of innovation and consumer choice that the internet has brought about over the past decades. Too often, **traders misuse their online presence to rebuild virtual barriers between countries, or to unjustly discriminate between consumers living in different Member States** - practices that should not exist in Europe's single market. Furthermore, to access and benefit from the digital market, consumers need **highly competitive and efficient telecommunication services**.



Last but not least, consumers need **effective and efficient protection**. Building trust and guaranteeing choice is insufficient if consumers cannot exercise their rights and protect themselves when problems arise. **Affordable access to redress mechanisms and efficient cooperation between EU and national enforcement authorities** are both paramount in ensuring that existing rights effectively serve consumers and in helping to foster consumer trust.



Consumer trust in the digital world

1

Strengthening consumer rights in the EU

While European consumers increasingly shop online, there remain **significant obstacles and barriers** that discourage them from engaging in the digital economy. These obstacles are often **linked to uncertainties around the lack of specific rights at the EU level**.

This is particularly the case when consumers buy **digital content products** such as music, apps, software, ebooks or films. **In most Member States, consumer protection laws are inadequate for dealing with the particularities of digital products.**

The European Commission has rightly identified the updating of EU consumer laws as a priority area, and has consequently announced a legislative initiative for the online purchase of digital content as one of the key initiatives of the Digital Single Market strategy.

A second legislative initiative announced in the Digital Single Market strategy aims to deal with the **online sale of tangible goods** such as an actual book or bicycle. **Whereas we agree that there is an urgent need for new rules on digital content products, BEUC remains sceptical as to whether special rules for online purchases of tangible goods are necessary since there are already extensive EU laws in place.** The 2011 [Consumer Rights Directive](#), for example, offers a comprehensive framework for consumer rights that is also applicable to online sales, and that significantly helps to reduce legal fragmentation whilst granting a high level of protection to consumers.

As regards the rights and remedies available to consumers when a good does not conform to its contract, e.g. a defective good, the Consumer Sales Directive guarantees minimum protection standards across the EU. While it could make sense to further harmonise these rules throughout the EU, the creation of a parallel legal

What rights for digital content?

Whereas guarantee laws protect the consumer whose new vacuum cleaner breaks down after a couple of weeks, it is less obvious what rights people have when for example a video file is corrupted. Are consumers entitled to a replacement or refund when a faulty film bought online is concerned? The answer is 'no' under EU law, and there is often uncertainty in national laws.



guarantee scheme applicable only to goods purchased online is highly questionable. Two separate regimes for online and offline purchases is not a desirable concept from a consumer policy perspective.

Instead, the European Commission should continue to evaluate the functioning and eventual reform of the Consumer Sales Directive as already envisaged in the framework of the 2016 REFIT exercise, and propose solutions to modernise this piece of legislation. In the meantime, model contracts for the online sale of goods could be developed and agreed between different stakeholders such as consumer associations and e-commerce business organisations.

Finally, in its Digital Single Market strategy, **the European Commission proposes allowing traders “to rely on their national laws based on a focused set of key mandatory EU contractual rights for domestic and cross-border online sales of tangible goods”** (also referred to as the “home option”). This announcement raises many questions and can be variously interpreted. **From a consumer policy point of view, such an approach is highly problematic** as it could lead to the circumvention of existing levels of protection in conflict-of-law rules for cross-border transactions (as stipulated in the Rome I Regulation). These rules function as a safety net in case serious problems arise.

BEUC welcomes the announced initiative to harmonise consumer contractual rules for purchasing digital products. Since there is legal uncertainty as to the applicable rules for these transactions, European legislative measures are necessary. However, we are sceptical about the announcement of new rules for the online purchase of tangible goods. The fragmentation it would create between the online and offline worlds may lead to confusion and the ‘second class’ protection of consumers buying in the ‘physical’ world. BEUC recommends that the legal guarantee rules for tangible products are not split between online and offline regimes, and are firstly looked at within the REFIT evaluation.

Any legislative initiative must guarantee high-level consumer protection and should not undermine existing standards safeguarding consumer protection for cross-border contracts, such as those under the current conflict of laws regime.



Consumer trust in the digital world

2

A balanced copyright regime

The dynamic and fast-evolving market of online audiovisual content, music streaming, video games and ebooks - also known as 'online content' - requires a flexible legal framework that meets consumers' expectations. **The Copyright Directive, which dates back to 2001 and precedes the mass distribution of copyrighted content over the internet, does not fulfil this criteria.**

Although a legal framework ensuring that authors are appropriately remunerated is essential, current international, European and national copyright rules serve mainly to protect the economic interest of large corporations. The rationale of these rules is no longer to create an incentive for innovation and the dissemination of culture, but rather to maximise profits for rightholders to the detriment of both creators and consumers.

Format shifting

A survey by our UK member Which? revealed that while 66% of people were unsure of what is legal or not under current copyright laws, the majority of consumers believed they should be able to format shift copyrighted materials. Six in ten people (63%) believed that they should be able to copy copyrighted works for personal use, and more than half (56%) agreed that "the price I pay for copyrighted material should include permission to make private copies in another format".

Consumers use copyrighted content on a daily basis but are often oblivious to the legality or non-legality of their online activities. Am I allowed to bypass technical protection measures to copy a film I legally downloaded so that I can play it on a DVD? Can I re-sell an ebook, or transfer it to a friend or family member? These are legitimate questions that have no clear response in EU and national copyright laws.



A recent **survey** carried out by BEUC members in 10 countries canvassed five types of copyright experts regarding the legality of ordinary consumer acts involving **copyrighted content**. The results of the survey showed a great divergence of views, showing the need to clarify the disparate national laws.

John wants to use his favourite band's latest song on his family Christmas celebrations video and upload it to YouTube so his family and friends can enjoy it.



Of 29 survey answers from across 10 countries:

- 4 said this was "legal"
- 18 said this was "illegal"
- 7 said it was "unclear"

The European Commission announced a long-awaited copyright reform as part of its Digital Single Market strategy. However, the main focus of the overall reform is strengthening the enforcement of Intellectual Property Rights. Global decision makers have reflected the creative industry's requests for stronger copyright enforcement mechanisms in different international agreements, even to the detriment of fundamental rights. The rejection of the Anti-Counterfeiting Trade Agreement (ACTA) by the European Parliament in 2012 was a clear message that Europe embraces fundamental rights over economic interests.

BEUC calls on the European Commission to incorporate the consumers' viewpoint into the forthcoming copyright reform by:

- ① harmonising the system of exceptions and limitations to the use of copyrighted content by consumers, including a specific exception for user-generated content for non-commercial purposes;
- ② immunising exceptions and limitations against unjustified technical protection measures and unfair contractual agreements;
- ③ bringing more transparency and fairness into the system of private copying levies by defining conditions for calculating fees and by mandatory consumer information about amounts and justifications for these levies; and
- ④ ensuring that the enforcement of copyright rules is proportionate and respects the fundamental rights and freedoms of users.



Consumer trust in the digital world

Although effective and proportionate enforcement mechanisms are important, **a balanced copyright reform must address key areas for consumers including the following: enabling access to competitive offers of copyrighted content across Member States; the recognition of legitimate uses of copyrighted content in the form of user-generated content** (e.g. remixing a song and posting it online); **issues around technical protection measures and contractual provisions restricting the exercise of exceptions and limitations** (e.g. can a rightholder or supplier technically prevent the private copying of legally bought content); **and the reform of the current system of private copying levies.**

For these reasons, BEUC welcomed the European Parliament's July 2015 resolution on the implementation of the Copyright Directive, which asks the European Commission to assess the effectiveness of current copyright law from the consumers' perspective and to develop a set of clear and comprehensive consumers' rights.

The forthcoming revision of the Copyright Directive provides a unique opportunity to balance the interests of consumers with those of creators and of rightholders, and should also serve as a model for an international legal framework regulating the exploitation of copyrighted works.



3

Privacy is and must remain a fundamental right, also in the digital era

The personal data of consumers has become a commodity in the digital era, and its value is likely only to increase. Many of the mainstream consumer services provided by companies like Facebook and Google are based on 'for free' models, in which consumers are tracked and may be profiled as they surf the web in exchange for using the service.

This raises potential concerns about price discrimination, behavioural advertising without informed consent, and state surveillance.

As technology continues to develop rapidly and more and more companies collect and process huge amounts of personal data, [the importance of protecting consumers' privacy](#) is also increasing exponentially. **Digital**

technologies and Big Data might have the potential to improve consumers' daily lives by increasing connectivity between people and products, but this must not come at the expense of fundamental rights and freedoms.

'Free' social networks?

In 2015, our German member VZBV took action against Facebook for misleading consumers by claiming that their service is for free, when in reality consumers pay with their personal data. The case is pending.

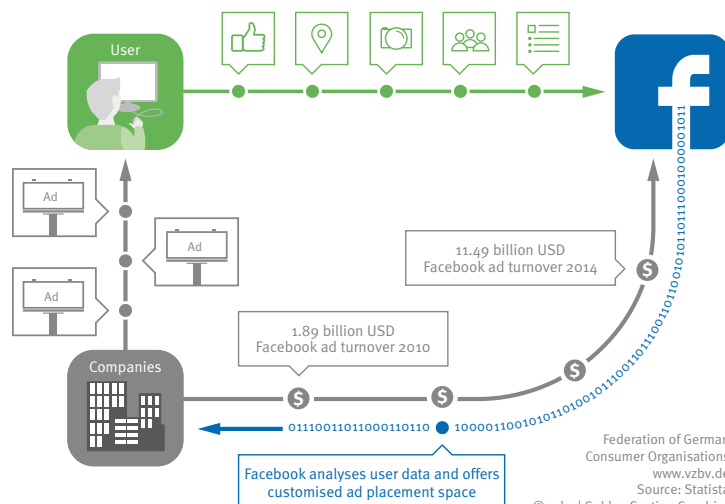
The Facebook currency:

DATA

Facebook does not charge people for using its service. However, Facebook uses their data by selling these to companies across the globe in the form of personalised ad spaces.

The rule here is: the more personalised a user profile, the more expensive an ad space can be sold.

Every piece of user information therefore equates income for Facebook.





Consumer trust in the digital world

The European Commission's own **evidence** shows that the protection of personal data is a crucial concern for EU citizens:



- Only a minority (15%) feel they have complete control over the information they provide online; 31% think they have no control at all.
- Roughly seven out of ten people are concerned about their information being used for a different purpose from the one it was collected for.
- Only two out of ten respondents are always informed about data collection and the way data is used.

It is high time that consumers are provided with greater transparency, choice and control over the way their personal data is collected and used online. Further to this, the 'Internet of Things' enabling the connection of various devices (for example the control of a television from a mobile phone) can offer innovative and useful solutions in people's daily lives. However, it is essential to ensure that these technologies fully respect data protection principles.

BEUC calls for the urgent adoption of the General Data Protection Regulation and welcomes the Commission's plan to review the ePrivacy Directive to ensure a high and uniform level of data protection for all consumers online.

Protection of personal data and economic growth are not contradictory. An effective legal framework for data protection will allow consumers and businesses to fully reap the benefits of the Digital Single Market and the Big Data revolution without compromising fundamental rights and freedoms. The EU is, and should continue to be, the example when it comes to privacy and data protection around the world.



1

Building a truly competitive Digital Single Market

Competition is crucial in ensuring innovation and consumer choice. Competitive markets benefit consumers by enabling them to compare products and shop according to their preferences.

As recently seen in the [Google antitrust investigation](#), large online platforms that act as an entry point for online products and services can easily develop dominant positions and consequently abuse their market power. **By becoming online gatekeepers, certain platforms like e-commerce marketplaces, search engines and social networks can thus negatively affect online competition and innovation, and prohibit greater choice and better deals for consumers. Strong enforcement of EU competition rules is therefore paramount in preventing market abuses and upholding consumers' interests.**

When analysing the online ecosystem, the different roles played by different types of platforms, as well as their influence in their own and surrounding markets, must be considered in order to identify any existing legislative gaps and enforcement challenges. **The underlying objective should remain the development of a Digital Single Market that has consumer welfare as its top priority, as this is what will allow it to thrive.**

Additionally, a thorough analysis of different types of 'Sharing Economy' platforms should be carried out, with a view to ensuring that relevant legislation allows the development of these services to enable new forms of consumption and production. At the same time, high levels of consumer protection must be maintained.

BEUC welcomes the initiative to assess the role of online platforms in the digital economy and the launch of the competition sector inquiry into the e-commerce sector. Before deciding upon the need for new legislation, it is necessary to identify regulatory gaps and market distortions and assess whether they can be solved by applying existing rules. In particular, we call on the Commission to use its full powers under competition policy to ensure that no company can unlawfully obtain or benefit from a dominant position in the Digital Single Market.



2

Tackling territoriality and geo-blocking

Despite the existence of the single market, citizens still face discriminatory practices by traders who refuse to provide their services or apply different access conditions depending on the consumer's country of residence.

Furthermore, **some businesses have re-introduced territorial barriers by rejecting offers from consumers residing in other Member States.** For example, a transaction might be terminated following the identification of the consumer's country of origin from his or her payment details.

A company might also refuse to deliver goods to a certain country, or apply dissimilar conditions or different pricing policies in order to prevent consumers residing in other countries from benefiting from better deals.

Price discrimination?

The European Commission asked France to investigate whether Disneyland Paris is discriminating consumers on the basis of their country of residence. As reported by media, the company was charging differentiated prices to families according to their country of origin: for the same premium package, French consumers would pay €1,346 while British visitors were charged €1,870 and Germans €2,447.





Although in some cases the restriction of cross-border sales might be justified, this should be the exception and not the rule in the Digital Single Market.

It is therefore necessary to clarify the situations in which discrimination could be allowed following a **pro-single market and consumer welfare approach**.

BEUC welcomes the European Commission's intention to put an end to geo-blocking practices that reduce consumer choice. It is essential to ensure the appropriate implementation of Article 20.2 of the Services Directive, which forbids discrimination in the provision of services on the basis of nationality and/or place of residence. Additionally, it is necessary to clarify the objective reasons that could justify such discrimination on an exceptional basis.

The European Commission must continue to enforce antitrust rules, particularly the Regulation on Vertical Restraints and the accompanying guidelines, to ensure that the special rules on selective distribution are not used to restrict the availability of products via online commerce channels and to prevent competition to the detriment of consumers.



Consumer choice in the digital world

Further to this, it is important to highlight that **geo-blocking, particularly in the audiovisual sector, is also caused by exclusive licensing practices**. These practices often lead to a limitation in choice, as consumers can not legally access online content available to consumers in other Member States but not accessible in their own countries.

In these cases, it is important that the European Commission continues to **enforce the existing EU competition rules** and explores what legislative measures could contribute to ease cross-border access to content through multiple channels, including online distribution.

Access denied

Territorial discrimination is a recurrent problem for consumers who cannot watch their favourite television programme or film online, or who are blocked from the streaming of their favourite sport when abroad.





3

Online payments

Although a well-functioning single market for **payment services** is a precondition for achieving a Digital Single Market, many obstacles remain. These include **geo-blocking of a consumers' means of payment** (e.g. websites not accepting foreign credit cards); **concerns about cybercrime and misuse of personal data; payment card theft; and limited choice for payment methods.**

Further to this, **in most cases consumers are forced to rely almost exclusively on credit cards for online payments.**

This contradicts the demand for payment services that are equally secure yet less expensive, as well as convenient and respectful of consumer privacy.

Payment cards denied

Retailers often decline the credit cards of 'foreign' consumers. For example, Polish consumers may not be able to make purchases from German webshops, as traders often do not accept credit cards issued in Poland and there is no other widely-accepted method of payment offered to complete the transaction.

BEUC calls on EU institutions to

- ① ensure that online retailers accept a wide choice of payment methods, including debit cards as a universally accepted payment instrument;
- ② forbid the discrimination of consumers solely based on the country of origin of the payment instrument;
- ③ ensure that existing security measures adopted at the EU level are properly implemented and enforced, while reducing the risk of security loopholes in online transactions; and
- ④ promote the development of alternative user-friendly and secure pan-European payment solutions.



4

Delivery of parcels

The price of deliveries in cross-border purchases is also a source of consumer concern. Although consumers may find cheaper deals in other Member States, **shipping costs are often so high that buying cross-border is not a real option.**

However, affordability is not the only problem. Our members also reported problems in relation to the quality of the service, particularly during high delivery periods like Christmas when consumers are confronted with delays and inconvenient delivery times. Additionally, there is the problem of **lack of consumer trust when it comes to return policies and complaint handling if the product is damaged after the consumer has sent it back to the seller.**

Cheaper to buy abroad? Wait until you see the delivery charges!

Our Italian member Altroconsumo compared delivery charges for both domestic and cross-border online goods in an investigative shopping exercise. The results showed that delivery costs are often so high that shopping abroad is not a real advantage for consumers, even when the goods are priced lower.



BEUC recognises the need to adopt an ambitious EU plan to reduce delivery prices in cross-border purchases. A first step towards this objective is to bring more transparency around the costs of cross-border deliveries between e-retailers and postal operators. In this regard, it would be advisable to develop a monitoring scheme for prices in cross-border deliveries by national regulators under the coordination of the European Commission. As part of the transparency dimension, it is essential that the rules on pre-contractual information for prices of the Consumer Rights Directive are enforced to prevent consumers from being surprised by hidden delivery charges.



5

A Europe of seamless telecommunications

A Digital Single Market will neither exist nor thrive without an underlying competitive [Telecoms Single Market](#) to sustain it. This requires first and foremost ensuring that there is vibrant competition in every corner of Europe allowing all consumers to access the internet at affordable prices. Efficient competition has already brought about a significant increase in consumer choice and service quality concerning mobile and internet access services, as well as a boost in investments and a decrease in prices.

This positive cycle would not have been possible without a regulatory framework purposely designed to achieve these goals. **The pro-competitive objectives of the current telecommunications regulatory framework should continue to be the guiding principles during the reform.** Importantly, ex ante regulation dealing with telecommunications infrastructure has proven fundamental in opening markets to increased competition and should therefore not only be maintained, but also improved and reinforced.



Yet competition alone is not enough. Consumers need to be able to easily compare offers, switch freely when they are dissatisfied, benefit from strong protection by a solid and enforceable set of rights, and have access to effective resolution mechanisms when disputes arise. Unfortunately, much progress is yet to be made on all of these fronts in the rapidly evolving telecoms market. Therefore, the future reform of the regulatory framework must ensure that consumer rights and protection mechanisms are strengthened and updated to reflect the state of the markets today and, via an update of the Universal Service Obligation, guarantee that all consumers can have quality internet access at an affordable price.



Consumer choice in the digital world

Building a Telecoms Single Market that serves consumers also requires ensuring that all network operators and content providers deliver their services and content **in full respect of the net neutrality principle, so that consumers decide what to use or access online**. The recently adopted Connected Continent Regulation endorsed this principle, but it must now be adequately implemented by Member States in order to ensure the strong protection of net neutrality in Europe.

In order to establish a true Telecoms Single Market in Europe for consumers to enjoy, artificial barriers must be brought down. This would allow all **consumers the right to roam within Europe as if they were home**, without having to pay additional charges. A Telecoms Single Market would also mean that consumers could call and send messages across borders at reasonable prices, without having to worry about whether the person they want to reach is in a different country. The recent **Connected Continent Regulation**, which stipulates that roaming fees for European consumers will be eliminated as of June 2017, must be implemented so as to ensure that exceptions to the abolition of roaming fees are strictly limited and economically justified.

BEUC holds that the regulatory framework for telecommunications services should not only be maintained, but that its pro-competitive principles should be upheld and reinforced. In particular, rules regulating access to infrastructure are necessary to guarantee adequate levels of competition. The consumer rights legal framework for telecoms services must be updated, and the scope of the Universal Service Obligation expanded to include access to the internet.

More work is necessary to ensure that the Connected Continent Regulation effectively guarantees the protection of the openness and neutrality of the internet and the end of roaming fees.



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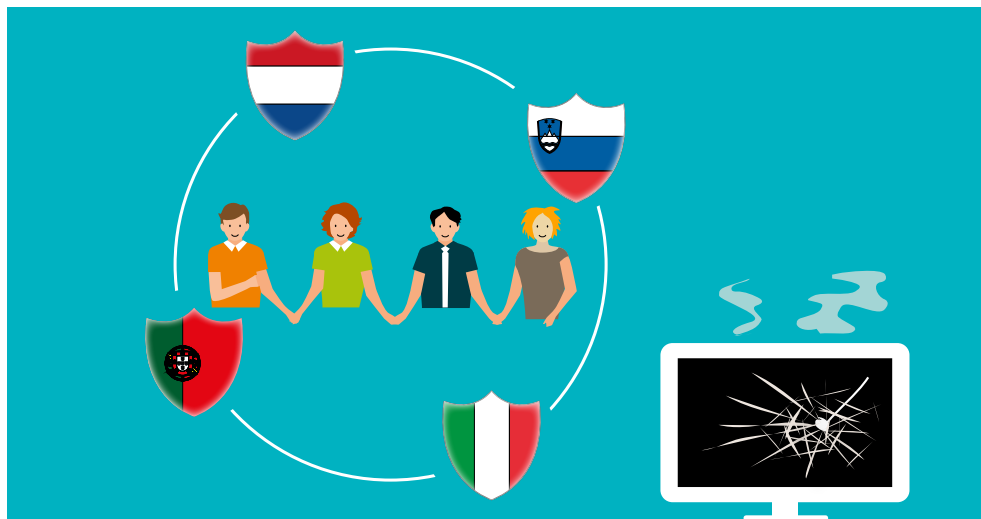
Improving enforcement cooperation

The internal market offers a unique opportunity for businesses to sell their products easily across borders. Consequently, in cases where unfair commercial practices are used, many consumers in many Member States are simultaneously affected.

Therefore, new ways of **strengthening and improving enforcement** across the EU as well as within Member States must be explored. The Digital Single Market strategy announced the review of the Consumer Protection Cooperation (CPC) Regulation. This is an important step towards **maximising enforcement cooperation among national authorities and ensuring the consistency of enforcement actions carried out at the national**

Apple case

In 2012, BEUC coordinated the request from 11 consumer associations that Apple stop misleading European consumers about their guarantee rights. The case was started after the Italian competition authority fined Apple for the unfair promotion of its Apple Care Protection Plan, a commercial guarantee which overlapped with the rights granted to consumers under EU law in case of a defective product. As a result, several consumer associations across Europe took judicial action against Apple, pushing the company to change its practices by properly informing consumers about their legal rights.





Effective protection in the digital world

level against companies simultaneously applying illegal practices in different countries.

In this context, **there is a need for authorities to cooperate more efficiently with consumer organisations based on constructive exchange of information. Consumer organisations should be able to participate in the priority setting of the enforcers and discuss concrete enforcement issues.** For example, it should be possible for consumer organisations to bring cases to their national enforcement authorities and ask for enforcement action. The results of the coordinated actions of consumer organisations against various airlines or traders, such as in the [Apple case](#), show their high level of professionalism and demonstrate the importance of dialogue and cooperation for the protection of consumers.

BEUC is very supportive of the European Commission's decisions to put enforcement of consumer rules among its top priorities for consumer policy and to seek new ways to strengthen and improve enforcement across the EU as well as within Member States. Enforcement cooperation must be strengthened, in particular with regard to EU-wide infringements, and BEUC calls on national enforcers to involve consumer organisations in this important work. Also, the authorities should put a greater emphasis on the need to support consumer redress.



2

Ensuring access to consumer redress

Even more in the online than in the offline world, consumers heavily rely on legal mechanisms to address concerns such as “What do I do if things go wrong?” or “How do I get my money back?”

Many consumers are reluctant to litigate for small claims when faced with disproportionate costs and risks of proceedings, and are thus often left without a solution to their problem if an amicable settlement with a trader proves impossible.

Alternative Dispute Resolution (ADR) mechanisms, which lead to out-of-court settlements through the intervention of a third independent party, can offer inexpensive and effective solutions to individual consumer disputes. The recent European legal framework for ADR aims to secure access to high-quality, transparent, effective and fair consumer ADR mechanisms. The ADR Directive has been applicable since July 2015, and an evaluation of implementation by Member States and the functioning of the new systems should be carried out soon.

Consumer complaints via ADR

The use of ADR by traders still remains underdeveloped with only a few percentage of retailers offering it to consumers: In 2012 it was reported that only 10% of retailers have used ADR mechanisms to resolve disputes with consumers, and only 2% of all retailers have used such mechanisms on a regular basis.

It needs to be borne in mind that the ADR Directive does not oblige traders to use available alternative schemes, which is why its success will largely depend on the readiness of business to participate in the systems.

An additional and interlinked innovative mechanism which may facilitate affordable access to consumer redress is the **Online Dispute Resolution (ODR)** platform, which



Effective protection in the digital world

will be fully operational as of May 2016. The ODR platform will handle disputes that arise from online transactions, and will link national Alternative Dispute Resolution entities. **If properly implemented, it has the potential to serve as an effective and adequate regulatory response to the increasing number of disputes related to online transactions.**

BEUC considers ADR to be an important tool for consumer redress, and its use should be promoted. However, the success of voluntary systems depend on the willingness of the relevant parties to use them. It is therefore of the utmost importance that businesses are encouraged to use available ADR schemes. Another challenge is to make sure that ADR schemes comply with high standards and quality criteria, especially with regard to independence and transparency.

A smoothly-working ODR platform may contribute to affordable access to consumer redress if it is fit for practice and fulfils the requirements as set out in the Regulation on consumer ODR. These include a high level of consumer protection; access to a simple, efficient, fast and low-cost way to resolve disputes; data protection; and the respect of fundamental rights and principles as set out by the Charter of Fundamental Rights of the EU.

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- BE - Test-Achats/Test-Aankoop
- BG - Bulgarian National Association Active Consumers - BNAAC
- CH - Fédération Romande des Consommateurs - FRC
- CY - Cyprus Consumers' Association
- CZ - dTest - Czech Consumers' Association
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- DE - Stiftung Warentest
- DK - Forbrugerrådet Tænk
- EE - Estonian Consumers Union - ETL
- EL - Association for the Quality of Life - E.K.PI.ZO
- EL - Consumers' Protection Center - KEPKA
- ES - Confederación de Consumidores y Usuarios - CECU
- ES - Organización de Consumidores y Usuarios - OCU
- FI - Kuluttajaliitto - Konsumentförbundet ry
- FI - Kilpailu- ja kuluttajavirasto - KKV
- FR - UFC - Que Choisir
- FR - Consommation, Logement et Cadre de Vie - CLCV
- HU - National Association for Consumer Protection in Hungary - OFE
- HU - National Federation of Associations for Consumer Protection in Hungary - FEOSZ
- IE - Consumers' Association of Ireland - CAI
- IS - Neytendasamtökin
- IT - Altroconsumo
- IT - Consumatori Italiani per l'Europa - CIE
- LU - Union Luxembourgeoise des Consommateurs - ULC
- LT - Alliance of Lithuanian Consumer Organisations
- LV - Latvian National Association for Consumer Protection - PIAA
- MK - Consumers' Organisation of Macedonia - OPM
- MT - Għaqda tal-Konsumaturi - CA Malta
- NL - Consumentenbond
- NO - Forbrukerrådet
- PL - Federacja Konsumentów
- PL - Stowarzyszenie Konsumentów Polskich - SKP
- PT - Associação Portuguesa para a Defesa do Consumidor - DECO
- RO - Association for Consumers' Protection - APC Romania
- SE - The Swedish Consumers' Association
- SI - Slovene Consumers' Association - ZPS
- SK - Association of Slovak Consumers - ZSS
- UK - Which?
- UK - Citizens Advice



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