



Finnish Presidency of the European Union

BEUC priorities
2019



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Introduction

The European Consumer Organisation (BEUC) is the umbrella organisation for 45 independent consumer organisations in 32 European countries. Our mission is to represent and promote consumers' interests to EU decision makers in all consumer-relevant areas that match our members' strategic priorities. Our member in Finland is Kuluttajaliitto-Konsumentförbundet ry.

The next six months will see the start of the new European Parliament and the inauguration of a new European Commission. Amidst this period of institutional changes, a number of important consumer files are still awaiting finalisation. The Finnish Presidency has the important task of bringing these legislative processes to a successful conclusion.

In this Memorandum for the Finnish Presidency of the Council of Ministers, BEUC highlights the most pressing files under the Presidency's term that are of relevance to consumers. We also make concrete proposals for how the Finnish Presidency can work towards successful consumer policies, and provide recommendations for how the Council of Ministers and the European Parliament can legislate in favour of consumers.

In this Memorandum, we draw attention in particular to the following initiatives:

Collective redress

The legislative proposal on representative actions should be adopted as quickly as possible. It should allow consumer associations to make use of collective compensation actions across the EU, while at the same time creating a level playing field for all businesses by penalising the cheaters.

Digital Single Market

The finalisation of the work on a legislative proposal for ePrivacy is overdue and urgently needed. This legislation should lead to a higher level of privacy protection for consumers in the digital age and should complement the General Data Protection Regulation (GDPR).

Access to innovative medicines

The legislative proposal on Health Technology Assessment (HTA) has the potential to help governments save money, and to reward health technology only if it benefits consumers.

Financial services

Legislation on non-performing loans, on crowdfunding and the review of the Motor Insurance Directive should all lead to better outcomes for financial services consumers.

Rail Passenger Rights

The legislative proposal on rail passenger rights has the potential to improve the protection of passengers travelling by train and, as a result, promote the use of this mode of transport amongst European consumers, thus contributing to the decarbonisation of the transport sector.

We hope that progress will be made on these and other initiatives mentioned in this Memorandum, with the aim of delivering clear benefits to European consumers.

We wish Finland a most successful Presidency.

Monique Goyens
Director General

Örjan Brinkman
President



Horizontal

1

Multiannual Financial Framework

Why it matters to consumers

Consumer policy is one of the very few EU legislative areas that is immediately tangible to European citizens and consumers and can positively impact their daily lives. Through its Consumer Programme, the EU funds for example a product safety rapid alert system, coordinated enforcement actions, an online dispute resolution platform, and the representation of consumer interests at EU level.

Not only does the EU influence consumer policy through its legislative initiatives, it also financially supports European consumer organisations, thus enabling them to bring the consumer perspective to the EU policy debate. These policies and actions require corresponding financial support.

State of play in legislative procedure

The European Union's next long-term budget (the so-called Multiannual Financial Framework, or MFF) is currently under preparation, and will cover the period between 2021 and 2027.

The budget proposal was presented in May 2018 by the **European Commission**. The Commission also put forward additional legislative proposals for specific spending programmes (including its Consumer Programme) in June of the same year. The **Council**, after obtaining consent from the European Parliament, will adopt the MFF regulation. The **European Parliament** and Council are both in the process of weighing the Commission proposal.



Recommendations for the Presidency

We expect the Finnish Presidency to help deliver a budget that allows the EU to demonstrate to its citizens the added value of belonging to a strong political and economic union. Regaining people's trust in EU politics and institutions should be an important objective for the next Multiannual Financial Framework. Consequently, the financial envelope for consumer policy should be increased.



What we need to succeed

- EU level funding for consumer protection organisations in the context of the EU's consumer policies should be guaranteed as a strong element of democratic EU and national decision making.
- Initiatives to support the financial sustainability of national consumer organisations should be introduced, such as requiring their meaningful and remunerated participation in consumer relevant research and innovation programmes.
- European capacity-building projects, which have enabled the training of consumer professionals in countries with less affluent consumer movements, should be continued.
- Public and private enforcement to ensure actual impact vis-à-vis consumer rights should be strengthened. This could partly be financed through the introduction of the principle that EU competition fines be retroceded to fund consumer projects.
- Activities that ensure a high level of protection for human health should also be increased. We call for an ambitious agenda for the funding of European health policy activities beyond 2020. There has never been a stronger case or a more vital moment for the EU to step up work on health protection. While life expectancy is improving, the years gained are often lived in relatively poorer health due to the proliferation of preventable chronic diseases.

Additional sources



The New Multiannual Financial Framework (MFF) – 2021-2027
BEUC response to the public consultation
[BEUC-X-2018-015](#)

2

‘Towards a Sustainable Europe by 2030’ and ‘A Clean Planet for All’ strategies

Why it matters to consumers

Carbon dioxide and other greenhouse gases are accumulating in the atmosphere and will stay for centuries. As a result, the climate will continue to change even if we manage to drastically cut emissions, exposing future generations to unexplored risks.

This means that European consumers are affected by and will increasingly suffer from the impact of unsustainable development and a changing climate through – among other trends – endangered food security, lower health standards, and higher living costs related to increasing prices for food, energy and transport. The EU must act boldly by adopting ambitious and far-reaching policy measures in order to prevent devastating climate change, resource scarcity and unsustainable consumption and production. The needs of all consumers must be taken into account when developing these measures, and action must be inspired through a common vision for a sustainable and fulfilling future.

State of play



The **European Commission** adopted two landmark strategies in late 2018 and early 2019: a reflection on the implementation of the UN Sustainable Development Goals in the EU – ‘Towards a Sustainable Europe by 2030’ – and ‘A Clean Planet for All’, a long-term vision for “a prosperous, modern, competitive and climate neutral economy by 2050”.



The **European Council** adopted conclusions on sustainable development in April 2019 that emphasised the need to speed up the course of action. The Council pointed towards the importance of a decisive transition towards a circular economy. Other key action areas included protecting biodiversity, tackling the climate crisis and striving for sustainable agriculture and food, as well as adopting safe and sustainable low-carbon energy, buildings and mobility. A series of debates on the long-term vision laid out in ‘A Clean Planet for All’ were held in different Council formations during the first semester of 2019.



The **European Parliament** is expected to continue the discussions on both strategies.

Recommendations for the Presidency



We call on the Finnish Presidency to continue ambitious discussions among ministers on the strategies in order to develop responses for all policy areas, including consumer policy. We ask the Presidency to involve consumer organisations in these debates so that solutions will take consumer interests into account.

What we need to succeed

- Food and farming: The Communication rightly recognises that the food and farming sector can make a significant contribution to the EU’s climate mitigation efforts. Proposed options for mitigating the climate impact of agriculture seem to be mostly geared towards technological innovation, whilst consumption choices are hardly addressed. Although a growing number of consumers are willing to adopt diets that

are good for the planet, they struggle to do so due to the lack of clear guidance on what constitutes a healthy and sustainable diet. Making such information widely available to consumers should be a priority for the EU as part of its climate strategy. Consumers must be involved in discussions around food production and climate change, and their acceptance (or lack of) and attitudes towards certain food production technologies must be listened to and respected. The range of potential solutions to mitigate the climate impact of agriculture, food production and consumption must be openly debated together with consumers and society at large.

- **Transport:** As consumers increasingly suffer from air pollution and CO₂ emissions from transport continue to rise, the strategies rightly highlight the importance of decarbonising the transport sector. The best way to have a fully decarbonised transport sector by 2050 is to set ambitious medium-term objectives (such as the EU's CO₂ targets for 2025 and 2030) as well as a precise deadline for when the last fossil fuel car should be sold (between 2035 and 2040 at the latest).
- **Chemicals:** A successful circular economy can only be achieved if consumers are confident that secondary raw materials are safe. We therefore need effective controls on chemicals in secondary raw materials to ensure that recycled food contact materials do not contaminate our food, or that toys made from recycled plastics do not poison our children.
- **Financial services:** The financial system must serve society's needs. Environmental and social concerns are among the important challenges facing society, and the financial sector must take its share of responsibility in, for example, the transition to a low-carbon and green economy. Policy-makers must ensure that financial institutions cannot ignore the sustainability goals. Furthermore, consumers must have access to sustainable investment options.
- **Trade:** Member States should ensure consistency between both strategies and the 'Trade for All' strategy. There must be a focus on the sustainable development chapters of trade agreements. In addition, Member States should consider the inconsistency between the Investment Court System/Multilateral Investment Court and the goal of achieving a climate neutral economy by 2050.
- **Energy policy:** Smart, sustainable and inclusive energy policies that contribute to 'climate neutrality' by 2050 and meet the Paris Agreement must be integral to the EU's future policies and initiatives. In order to achieve the ambitious goals of the Communication, strong efforts will be needed to enable the participation of consumers in the energy transition. More attention to and a better understanding of the behaviour, needs and expectations of consumers is required.
- **Energy markets:** EU and national policies should lead to energy markets that are decarbonised, competitive and consumer-centric. Increased renewables and reduced consumption will be required for the decarbonisation of the system, with more action at the local and household levels. This transformation will require major investments and a significant redesign. Consumers should not disproportionately bear the burden of the costs. The EU and Member States must provide flexibility and support households as they attempt to increase efficiency; produce renewable electricity, heating and cooling; and change the way they consume.
- **Digital:** A strategic vision is needed so that the EU can lead the way in ensuring that the digital transformation also serves the goal of achieving a climate neutral economy. Digital technology has the great potential to help reduce emissions and optimise resources and efficiency in all sectors of our economy. Nonetheless, the environmental impact of the digital revolution must also be properly tackled.
- **Product policy:** To allow consumers to live more sustainably, it is important that the EU pushes further for systemic changes in how we produce and consume products and services. To this end, design policies (Ecodesign) and consumer information schemes (Energy Label and Ecolabel) should be further developed to achieve better resource and cost savings. More action must be taken to ensure that products become more durable and are repairable, upgradeable, reusable and recyclable. Additional action should also be taken to phase out single-use materials, giving consumers access to better, reusable alternatives.

3

Better Regulation

Why it matters to consumers

Transparent policy and law making, effective and efficient EU legislation based on high levels of protection, timely implementation at the national level, and good enforcement are all essential in order to ensure that European consumers can fully benefit from the Single Market and trust in Europe's economy, society and democracy. EU legislation is essential, not only for opening markets for business but also in providing the necessary protection, information and redress tools to consumers.

Better transparency of EU decision making, another focus of the Better Regulation Agenda, is essential for generating and maintaining people's trust in our democracies.

State of play in legislative procedure



Better regulation was a priority for the Juncker **Commission**, which presented its communication on 'Better regulation for better results' in May 2015. This was complemented by two communications in the autumn of 2017, and another on subsidiarity and proportionality in 2018. The final Communication on 'Stocktaking of the Better Regulation Agenda' was presented in April 2019.

Whilst everybody agrees that unnecessary administrative burdens through EU legislation should be reduced or altogether avoided, the shift of the institutional discourse from an "administrative" to a "regulatory" burden is problematic. A focus on reducing "regulatory burden" as promoted by the European Commission's Better Regulation Agenda risks giving too much importance to avoiding legal compliance costs for businesses whilst neglecting the positive impacts of legal protection and empowerment, which are necessary for people's trust and well-being. The current Better Regulation Agenda has led to a certain degree of procrastination in important EU policy areas (such as food, health and chemicals).

The European Commission's recent stock-taking report of the Better Regulation Agenda mapped out possible avenues to continue with the better regulation work.

Recommendations for the Presidency



We call on the Finnish Presidency to facilitate an open discussion on how to redirect this Agenda to ensure that EU legislation and enforcement will better meet their objectives: not only reducing the costs of compliance for business, but underlining the value of European legislation for our societies and benefiting all.

What we need to succeed

- We agree with the European Commission's overall conclusion that progress on the Better Regulation Agenda has been made over the past three years, in particular with regard to the transparency of the decision-making process. However we also underline the European Commission's finding that there is ample room for improvement.
- We underline the importance of a broad public debate about how the European Commission can shape an improved Better Regulation policy. First of all, the focus should move away from the reduction of costs and the burden of regulation. Instead, attention must be paid to strengthening the benefits and the efficiency of regulation for all stakeholders, in particular those who need to be protected and empowered via regulation. In overall terms and for the future development of the concept of better regulation, the benefits and efficiency of EU legislation in achieving its objectives should be put more into focus, rather than the 'simplification' aspects as stressed in the current mandate.
- Most importantly, the European Commission should change the concept and narrative of the Better Regulation Agenda to turn it into a positive initiative that acknowledges and promotes the values of EU legislation rather than questioning them. The scopes of the new Better Regulation and REFIT agendas should be broader, and they should improve EU legislation and not only reduce regulatory burdens. The primary objective of better regulation should be to look at how the objectives of EU legislation can be fulfilled and how the necessary improvements for people can be made.
- REFIT reports often provide for a wealth of interesting research and new information. And although these reports often illustrate important legislative shortcomings, the European Commission's follow-up action is often very limited. The Commission should make better use of REFIT reports in order to improve the effectiveness of legislation.
- Regarding public consultations, we welcome the clear increase in opportunities for stakeholders to express their views. However, the way in which many consultation questionnaires measure the effectiveness of EU legislation is unbalanced. For example, with regard to the achievement of legislative objectives, they look mainly at ways to achieve burden reduction.
- The European Commission's evaluations often do not put enough focus on the 'real' impact of legislation, namely how compliance with and enforcement of EU legislation works. This is an important element in terms of measuring legislative effectiveness.
- The work of the REFIT platform to come up with recommendations for how to simplify and reduce costs of legislation suffered from its narrow mandate. Citizens' suggestions to the platform often did not receive a response, and this resulted in a negative perception of EU legislation. The mandate of this exercise should be expanded in order to cover recommendations for the effectiveness of legislation.

ADDITIONAL SOURCES

Response to the European Commission's public consultation on "Stocktaking of the Commission's 'better regulation' approach"

BEUC-X-2018-120



FINANCIAL SERVICES

1

EU secondary market for non-performing loans

Why it matters to consumers

The European Commission has proposed the creation of a single – secondary – market for non-performing loans (NPL). This would enable banks to easily sell soured loans to third party investors, including so-called ‘vulture funds’, established in any EU country or outside the EU.

This initiative is against the interests of borrowers who are in financial difficulty. They would be exposed to credit purchasers and credit servicers (debt collectors) located in other countries. And it is unlikely that a supervisory authority would monitor the overseas practices of a passported debt collector registered in their country but operating in another one.

State of play in legislative procedure

The **Commission’s** NPL package – containing a regulation and a directive – was published in March of 2018. The co-legislators have already finalised work on the prudential backstop regulation that aims to impose higher capital requirements on credit institutions to prevent future NPL accumulation. As regards the proposed directive on a secondary NPL market, the **Council’s** general approach was adopted in March this year. On the other side, the **European Parliament’s** economic and monetary affairs committee has not yet adopted its position and has passed this file along to the next European Parliament.

European Commission

Council

European Parliament

Recommendations for the Presidency

We urge the Finnish Presidency to ensure that the interests of individual borrowers are protected under the NPL Directive. NPLs in Europe are a legacy of the recent financial crisis and irresponsible lending practices by some financial institutions. Therefore, the solution to the problem of non-performing loans must not be borne by distressed borrowers alone. Exposing these borrowers to debt investors and collectors is not an adequate and sustainable way to tackle NPLs.



1 | Vulture funds are various forms of private equity firms and pension funds that invest across a series of asset classes, one of which is debt.

What we need to succeed

- The scope of the directive should be limited to non-performing loans, while forbidding credit institutions from selling performing credit agreements to third parties.
- Whenever the borrower is in financial difficulty, the lender should exercise forbearance measures in line with Article 28 of the Mortgage Credit Directive and the European Banking Authority Guidelines on arrears and foreclosure.
- Credit servicers dealing with distressed borrowers should be required to obtain an authorisation *from* and to establish a branch or a subsidiary *in* the Member State where they intend to operate. Furthermore, they should be supervised by that same country's authority.
- When a credit institution intends to transfer a credit agreement to a credit purchaser at a specified price, the credit institution should allow the debtors (individual households) to buy back their debt at the same discounted price or with a small mark-up.
- Distressed borrowers should be strongly protected from unfair behaviour by credit servicers and credit purchasers. Thus, credit servicers and credit purchasers should be subject to strict conduct rules.
- Distressed borrowers should have the right to receive free or affordable legal support when in court. This ensures equal representation of the borrower and the lender or a third party.
- Member States should be able to maintain existing national measures aimed at protecting distressed borrowers, as well to adopt stricter measures.

ADDITIONAL SOURCES



Secondary market for non-performing loans:
The European Commission's proposal is a bad deal for distressed borrowers
BEUC position paper
[BEUC-X-2018-068](#)

2

Crowd and peer-to-peer finance

Why it matters to consumers

Given the drop in nominal returns on traditional savings products, consumers are increasingly attracted to alternative investment vehicles such as those offered by crowdfunding platforms. Although crowdfunding services offer potential benefits for investors, consumers may bear an increased level of risk when investing in the projects offered by these platforms.

Furthermore, as a relatively new form of financing, crowdfunding platforms have not yet faced the test of recession. It is key that these platforms are adequately regulated and that consumers understand the significant risks involved when investing in them.

State of play in legislative procedure



In March 2018, the **European Commission** adopted its proposal for a Regulation on European Crowdfunding Service Providers (ECSP) for business. Unfortunately, the proposal does not set minimum rules across the EU for crowdfunding platforms. Instead, it introduces an optional EU license that will allow crowdfunding platforms to choose whether to comply with their national regime or with the EU rules. If a platform chooses compliance with EU rules, it will no longer have to comply with existing national crowdfunding laws. Creating a purely optional license for crowdfunding platforms will not set a minimum standard for investor protection across the EU. An optional EU license also provides a route for platforms to dodge any potentially stronger rules currently in place in some Member States.



The **Parliament** adopted its position in November 2018. The **Council** is still working on its general approach.

Recommendations for the Presidency



We ask the Finnish Presidency to guide the Council towards the introduction of binding EU legislation on crowdfunding platforms. This approach is better oriented towards consumers/users than the purely optional EU regime as proposed by the European Commission, as it will ensure that investors are effectively informed and protected.

What we need to succeed

A consumer-friendly framework for crowdfunding and peer-to-peer finance consists at the least of the following elements:

- Clearly visible risk warnings, highlighting the inherent risks associated with crowdfunding and peer-to-peer finance.
- Disclosure and organisational requirements, such as due diligence of investment propositions and measures to avoid conflicts of interest.
- Strict caps on the amounts that can be invested into crowdfunding projects, thus limiting the exposure of consumers to risky investments.
- A requirement for crowdfunding platforms to disclose the overall default rate of projects they list.
- Business continuity arrangements in order to ensure that investors do not lose money in the event that platforms go bankrupt.

ADDITIONAL SOURCES

EU crowdfunding rules risk catering only for platforms, not consumers
Press statement
[BEUC-web-2018-008](#)

European Commission's legislative proposal on crowdfunding – missed opportunity!
Proposal for a Regulation on European Crowdfunding Service Providers (ECSP) for Business
Position paper
[BEUC-X-2018-075](#)

3

Review of the Motor Insurance Directive

Why it matters to consumers

Consumers need to have access to affordable, fair and transparent motor insurance policies. The current review of the Motor Insurance Directive should deliver positive reforms for consumers, making insurance policies more transparent and enhancing the capacity for consumers to switch between insurance contracts. Consumers across the EU should benefit from more affordable insurance premiums based on their driving histories.

State of play in legislative procedure

In May 2018, the **European Commission** announced new rules amending the Motor Insurance Directive. The changes proposed by the European Commission will enhance the protection of motor insurance policyholders and potential victims of motor vehicle incidents. New measures will now also require insurers to take into account claims history statements from other EU countries, ensuring that consumers can benefit from better insurance conditions when they move abroad. Under previous rules, insurers were not required by law to consider claims history statements issued in other EU Member States. This new requirement should ensure that citizens who purchase insurance when moving abroad can benefit from more advantageous insurance premiums based on their previous driving history in another EU country. While we welcome the ‘portability’ of claims history statements across EU Member States, the European Commission has not introduced an explicit obligation for insurers to take these statements into account when calculating premiums for consumers.

The **Parliament** adopted its position in February 2019, but did not adopt our proposed rules to impose and harmonise the use of ‘bonus-malus’ discounts at EU level. The **Council** is still working on its general approach.

Recommendations for the Presidency

We urge the Finnish Presidency to work towards a consumer-friendly regime for motor insurance.



What we need to succeed

- The only way to guarantee EU-wide portability of claims history statements and to improve consumer outcomes in the insurance market is to impose and harmonise the use of bonus-malus discounts at the European level. Mandatory bonus-malus rules already exist in several Member States, including France and Luxembourg. In other EU Member States, there is no specific obligation for insurance firms to take into account claims history statements, and insurers are free to determine the levels at which they set their premiums. In France, a mandatory bonus-malus scheme is already in existence: 95% of drivers receive a bonus based on their driving histories.
- To help consumers compare offers between different insurance firms, a standardised template for bonus-malus policies should be developed for insurance undertakings. At the moment, the bonus-malus tables provided by insurance undertakings can differ significantly in format, impeding meaningful comparison and in turn the switching of providers by consumers.
- The Motor Insurance Directive must be future-proofed in order to deal with anticipated technological changes in the automotive industry (connected and autonomous driving). The European Commission should be obliged to reassess the suitability of the Motor Insurance Directive in the near future to determine whether or not the liability system it provides will suit future needs.

ADDITIONAL SOURCES

Revision of the EU's Motor Insurance Directive
Position Paper
[BEUC-X-2018-088](#)

Consultation response on the review of the
Motor Insurance Directive
Consultation response
[BEUC-X-2017-149](#)

For more information: financialservices@beuc.eu



Consumer Rights

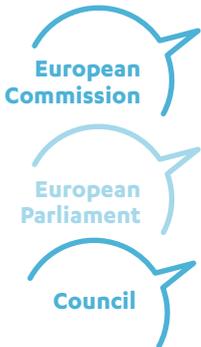
1

Revision of the Rail Passenger Rights Regulation

Why it matters to consumers

Although passengers travelling by rail are entitled to a high level of consumer protection throughout the EU, they currently do not always receive it. Protections differ significantly, as Member States have implemented the national exemptions provided by the current EU Regulation differently. In order to fully enjoy travelling by rail, passengers need more legal certainty and equal treatment no matter where they travel in the EU.

State of play in legislative procedure



In September 2017 the **Commission** published a legislative proposal for a recast of the current Regulation, which dates from 2007.

The **European Parliament** adopted an ambitious position on this proposal in November 2018. Among other things, this proposal called for the clause on force majeure to be deleted; for the mandatory provision of through tickets; and for higher compensation levels.

The **Council** has not yet reached a common position and is therefore not able to negotiate a final deal with the Parliament.

Recommendations for the Presidency



We ask the Finnish Presidency to ensure that the discussions in the Council on the rail passenger rights proposal move forward quickly, and that the consumer perspective and the European Parliament's position are taken into account. The new proposal for the revision of rail passenger rights is a positive step forward as it reduces the number of national exceptions from the scope of application, increases the transparency of rail services, and facilitates national complaint handling mechanisms. However, it unjustifiably reduces consumer protection in the case of force majeure, and does not provide easy access for consumers to through tickets. Through tickets, in which several railway services are represented by a single transport contract, would allow consumers to be covered by rail passenger rights for their entire journey.

What we need to succeed

- The possibility to use national exceptions should be further removed, both in time and in scope.
- The provision of through tickets should be mandatory.
- The new proposal should not allow for an exception linked to extraordinary circumstances.
- The implementation of a comprehensive system for dealing with consumer claims is key for effective consumer protection.
- Increased powers should be granted to the National Enforcement Bodies (NEBs) so that they can efficiently monitor compliance with rail passenger rights legislation.
- All operators should be obliged to adhere to an Alternative Dispute Resolution (ADR) scheme, without prejudice to the right of the parties to seek legal action in court.
- Complaint handling procedures should be implemented by all rail operators, and should include deadlines to be respected when dealing with complaints.
- Automatic compensation schemes should be available to passengers where technology allows it.

ADDITIONAL SOURCES

Rail Passenger Rights Regulation Recast:
BEUC position paper
[BEUC-X-2018-014](#)

For more information: consumer-rights@beuc.eu



DIGITAL RIGHTS

1

ePrivacy

Why it matters to consumers

Although beneficial to consumers, digital information technologies and the emergence of new services also represent a major challenge to the fundamental rights of privacy and personal data protection. It is important to ensure that consumers can benefit from innovative online services without having to give up their privacy rights

State of play in legislative procedure

In January 2017 the **European Commission** put forward a proposal for a regulation on ePrivacy. In October 2017 the **European Parliament** adopted a very strong and consumer-friendly position as its mandate for trilogue negotiations. The negotiations for a general approach are still ongoing in the **Council**. Meanwhile, the General Data Protection Regulation (GDPR) has entered into application, creating more pressure to ensure a comprehensive and consistent EU legal framework on privacy and data protection through the adoption of the ePrivacy Regulation proposal.



Recommendations for the Presidency

We urge the Finnish Presidency to swiftly reach a general approach in Council and to start trilogue negotiations on the proposal for the ePrivacy Regulation as soon as possible. The review must guarantee the protection of confidentiality in all electronic communications services and protect consumers against unwanted online tracking and unsolicited commercial communications. Hardware and software used by consumers must by default provide the highest level of privacy protection. The ePrivacy reform is essential for strengthening individuals' right to privacy and the confidentiality of communications, as well as for rebuilding and reinforcing public trust and security in the digital economy.



What we need to succeed

- As a principle, electronic communications must be confidential. Over-the-top services (OTTs) must be duly covered by the Regulation. In line with the European Parliament's position, it should not be possible to process electronic communications data under broad legal grounds such as for 'legitimate interests' or 'compatible purposes'. Whereas the processing of metadata without prior user consent for statistical counting could be envisaged, this must be subject to strong safeguards and strictly limited to purposes of public interest.
- Default settings in devices and software should be configured to provide the highest level of privacy protection, in line with the European Parliament's position. An obligation to simply provide information about the privacy settings would not be sufficient from a consumer privacy protection perspective, and would undermine the 'data protection by design and by default' principle enshrined in Article 25 of the GDPR.
- The behaviour and activities of users should not be monitored without their consent, and they should have access to digital services without being forced to accept unnecessary invasions of their privacy, as stated in the Parliament's position. In particular, making access to a service conditional on the acceptance of cookies that process personal data that are not necessary for the provision of that service should not be allowed. This would go against Article 7.4 of the GDPR.
- Users should be able to mandate NGOs to represent their interests, and NGOs must be able to take initiative whenever users' rights have been breached, in line with the European Parliament's position.

ADDITIONAL SOURCES

Summary of BEUC response to ePrivacy public consultation
[BEUC-X-2016-073](#)

Proposal for a regulation on privacy and electronic communications (ePrivacy)
 Position paper
[BEUC-X-2017-059](#)

Factsheet on ePrivacy
[BEUC-X-2017-090](#)

Infographic: Consumers caught in a tracking web
[BEUC-X-2017-102](#)

BEUC's views on Austrian Presidency proposed Amendments
[BEUC-X-2018-070](#)

Open letter to EU member states from consumer groups, NGOs and industry representatives in support of the ePrivacy Regulation
[BEUC-X-2018-108](#)

For more information: digital@beuc.eu



REDRESS AND ENFORCEMENT

1

New Deal for Consumers – the proposal for a Directive on representative actions

Why it matters to consumers

Lack of compensation for suffered harm is a major loophole in legal systems, allowing businesses to retain illegal profits. Judicial collective redress for consumers exists only in a limited number of Member States. And even when it is available, the models and effectiveness of the mechanisms vary significantly. They also do not provide for solutions in the case of harm caused by cross-border business transactions. For these reasons, there is significant discrimination when it comes to access to justice, and this is to the detriment of consumers.

State of play in legislative procedure



In April 2018, the **European Commission** published the long-awaited New Deal for Consumers package. This includes the proposal for a Directive on representative actions for the protection of the collective interests of consumers. This proposal links injunctions and collective redress measures and is a major breakthrough in EU consumers legislation as it finally addresses the gap in access to justice for EU consumers.



The **Romanian Presidency** made good progress in the negotiations on this legislative proposal, but it has not yet been possible to reach a general approach.



On the other hand, the **European Parliament** has already adopted a constructive first reading report. Most importantly, MEPs strongly supported the overall approach and key elements of the proposal. They improved some provisions, and called for the strengthening of provisions on minimum harmonisation.

Recommendations for the Presidency



We urge the Finnish Presidency to prioritise the representative actions proposal, and to do its utmost to ensure that the negotiations can be completed as soon as possible.

What we need to succeed

- Member States should make sure that consumer organisations are designated as qualified entities in all countries, and that they are able to ask for collective redress for consumers in a wide range of mass damage situations.
- The Commission proposal splits collective redress possibilities into three groups of cases: i) those in which the harmed consumers are identifiable and have suffered comparable harm; ii) those in which consumers have suffered a small amount of individual loss and it would be disproportionate to distribute the redress to them; and iii) those in which the quantification of individual redress is complex. For this last category, the proposal allows Member States to empower the court or another authority to simply issue a declaration of the infringement instead of carrying out the full collective redress procedure. This is of concern: it is not realistic to expect consumers to claim their redress individually, particularly in complex cases. An EU-level collective redress instrument is needed in all cases. We very much welcome the deletion of the possibility of derogation by the European Parliament.
- The scope of application of the representative actions should remain wide and cover all infringements that could potentially harm consumers. For example, EU legislation on product safety and medical devices is currently missing from the Annex of the proposal. We call on the Member States to include at least the legislation that was added by the European Parliament: namely food and product safety.
- The new Directive should facilitate consumers' ability to receive redress and should reduce costs for organisations that protect the collective interests of consumers.
- It should be possible to launch redress actions simultaneously with infringement actions. This will help to avoid lengthy time lapses between the final decision on the breach of law and the redress actions. We hope that the Council will agree to the European Parliament's improvements on this essential issue.
- Exemptions from the 'loser pays' principle so as to enable consumer associations to launch collective cases are needed. Most civil society organisations do not have the financial means to start collective injunction proceedings.
- Effective, proportionate and deterrent financial penalties in the case of non-compliance with the outcomes of the procedure by the trader are required. Such fines should then be redirected to consumer causes.

ADDITIONAL SOURCES

Representative actions and collective redress
Factsheet
[BEUC-X-2018-097](#)

Myths and realities on collective redress
Factsheet
[BEUC-X-2018-048](#)

Proposal for a Directive on representative actions
Position paper
[BEUC-X-2018-042](#)

Injunctions: Making them fit
Position paper
[BEUC-X-2017-035](#)

For more information: consumer-redress@beuc.eu



HEALTH

1

Access to medicines

Why it matters to consumers

Confronted with skyrocketing prices for medicines and limited public budgets, governments have to make very hard choices about which treatments to reimburse. Consumers must increasingly make ‘out-of-pocket’ payments in order to receive timely treatment, and they run the risk of not being reimbursed. This deepens existing health inequalities in the EU. What is more, many new health treatments are developed with the support of taxpayer’s money, which is used to subsidise universities and projects contributing to medical research. Companies do not take these contributions into account when setting prices for treatments, and consumers therefore end up paying twice for the final product.

Finally, many of the new medicines entering the market do not offer consumers any additional value in comparison with existing treatments. Superfluous drugs waste taxpayers’ money and, when reimbursed by healthcare systems, eat up budgets that could otherwise be spent on innovative treatments for consumers.

State of play in legislative procedure



In January 2018, the **Commission** presented a legislative proposal on Health Technology Assessment (HTA). This proposal aims to foster collaboration between national HTA bodies at EU level in order to avoid duplication in the current assessments. The added value will be efficiency gains in the assessment of new drugs and medical devices, and the facilitation of decisions by national authorities on which treatments to reimburse.



The **European Parliament** adopted its first reading opinion in February 2019, and agreed on a text that would significantly improve the Commission’s proposal. Meanwhile, negotiations are ongoing in **Council**. Under the Romanian Presidency discussions focused greatly on the question of joint scientific consultations, including their funding mechanism, and the identification of emerging health technologies. The progress report documents that most delegations welcomed the Presidency’s revisions in these areas. Negotiations advanced also on the questions of conflicts of interest and quality assurance.



In parallel, the European Commission has begun elaborating the implementation rules for the next EU research framework, Horizon Europe. This offers an excellent opportunity to include licensing clauses that would ensure a fair return on investment for publicly funded medical research.

Recommendations for the Presidency



We urge the Finnish Presidency to advance as quickly as possible on the negotiations for the legislative proposal on HTA, and to find a compromise that benefits consumers.

We further call on the Presidency to follow up on the 2016 Council conclusions “on strengthening the balance in the pharmaceutical systems” in order to ensure that new medical treatments are rewarded while at the same time guaranteeing the sustainability of healthcare systems. We in particular encourage the Presidency to promote the inclusion of funding conditions (such as equitable licensing) in the Horizon Europe framework.

What we need to succeed

- Pricing and reimbursement decisions should reward truly innovative products that offer added therapeutic value in comparison with existing alternatives. The HTA proposal could make this happen, and would ensure that consumers get value for their money. To this end, the new Regulation must result in high quality assessments for all medicines and should ensure that Member States use these assessments in deciding about pricing and reimbursement.
- At the same time, the new mechanism must guarantee that countries have enough flexibility to adapt the HTA reports to the needs of their national healthcare systems. The Regulation must also ensure good governance in the new HTA system, with transparent decision making that is free from conflicts of interest.
- The text adopted by the European Parliament goes in the right direction, as it contains provisions to ensure high quality data, transparency and prevention of conflicts of interest. The text also ensures that Member States use HTA reports, while guaranteeing some flexibility for adaptation to national contexts. The Council should follow this approach, and agree without delay on a legal text that takes our recommendations into account.
- Many medicines that have been developed thanks to public funding are increasingly expensive or unavailable. The EU should make public funding for medicines conditional on them being accessible and affordable for patients. Attaching these conditions to public funding would guarantee a public return on public investment and safeguard the public interest.
- More effective and transparent research and development (R&D) is required. Greater transparency is also needed around public and private funding for research in order to avoid taxpayers paying twice for the same product: first with R&D incentives for the industry, and then with high prices for medicines. Public and private research priorities should be better defined according to public health needs.
- We note with interest that the Finnish Presidency plans to promote discussions on the use of so-called ‘real world data’ in the medicines regulatory system. We urge the Presidency to address above all questions on quality (i.e. methodological standards) and data protection. While BEUC sees an added value in the use of observational studies to increase knowledge on the effects of medicines, these studies should complement, but not replace, randomised controlled clinical trials.

ADDITIONAL SOURCES

Sustainable access to innovative therapies
BEUC response to the OECD public
consultation
BEUC-X-2017-044

Access to medicines
Position paper
BEUC X-2015-104

BEUC Comments to the
European Commission’s Proposal on
a Regulation for Health
Technology Assessment
BEUC-X-2018-027

2

Digital Health

Why it matters to consumers

New technologies mean that health and healthcare services are rapidly and inevitably changing. Traditional health products and services are becoming digital, and consumers will be profoundly impacted by ongoing and future developments. On the positive side, the digitalisation of health care has the potential to deliver better disease prevention, diagnosis and treatment. Tools such as the Electronic Health Record (EHR) could provide consumers with 24/7 access to their disease history and medicines prescriptions, also when travelling or moving abroad.

However, the benefits of digital health products and services are accompanied by high risks when it comes to consumer privacy, security and safety. With health data becoming very profitable, security breaches of personal health records and data stored in healthcare settings may become more frequent. There are serious and far-reaching questions about the trustworthiness and safety of digital health products and services.

State of play in legislative procedure



In April 2018 the **European Commission** published a Communication on Digital Transformation of Health and Care, in line with the European Union's Digital Single Market Strategy. The Communication sets out a plan of action for the upcoming years aimed at enabling consumers to securely access their health data, also across borders; allowing researchers and healthcare professionals to advance medical progress through shared European data infrastructure; and empowering consumers with digital tools to look after their health, encourage disease prevention, and enable interaction between users and healthcare providers.

Recommendations for the Presidency



We encourage the Finnish Presidency to place the digitalisation of health and care on the Council's agenda so that clear political guidelines on future developments in this area can be provided. In particular, we call on the Finnish Presidency to ensure that consumers' privacy, safety and security are central to the implementation of the action plan on digital health.

What we need to succeed

- Building on its 2018 digital health strategy, the EU should continue to facilitate a European exchange system for Electronic Health Records (EHR). This system must guarantee that consumers have access to their medical data, electronic prescriptions and patient summaries when travelling or moving residence within the EU. Beyond the technical infrastructure (e.g. standards) of a common EHR system, the EU needs to ensure patient autonomy and the consumers' full control over their personal health data. At the same time, effective cybersecurity standards are crucial. Several EU laws – including the General Data Protection Regulation, the new Medical Devices Regulation and the Directive on security of network and information systems – aim to enhance health data protection and the IT security of health devices and systems. The EU needs to improve implementation and enforcement of the existing legislative framework. In particular, strong market surveillance and efficient redress mechanisms for digital health products and cross-border services must be put in place in order to guarantee the effective protection of all EU consumers.
- A minimum set of security measures must be obligatory for all digital health connected products – including health and wellbeing apps – as a condition for putting them on the market.

ADDITIONAL SOURCES

Role of Big Data for evaluation and supervision of medicines in the EU
BEUC response to public consultation
BEUC-X-2019-025

Electronic Health Records – Standard Formats
BEUC response to public consultation
BEUC-X-2018-007

Digital Health – Principles and Recommendations
Position Paper
BEUC-X-2018-090

Article 29 Working Party Guidelines on Consent and on Transparency under the GDPR
BEUC response to the public consultation
BEUC-X-2018-007

Transformation of health and care in the Digital Single Market
BEUC response to the public consultation
BEUC-X-2017-108

Health in the time of smart phones
Position paper
BEUC-X-2016-112

For more information: health@beuc.eu



SAFETY

1

Hormone disrupting chemicals

Why it matters to consumers

Every day we come into close contact with an enormous range of human-made chemicals. We use skin creams containing parabens, computers containing brominated flame retardants, and plastic kitchen tools containing Bisphenol A and phthalates.

Many of the chemicals found in consumer products are known to disrupt the hormonal system (these are known as ‘endocrine disrupting chemicals’ or EDCs). Endocrine disrupting chemicals have been linked to severe human health problems, including infertility, genital malformations, early puberty, obesity, cancer and neurobehavioural disorders.

In theory, EDCs are regulated by several EU laws. In practice, however, these laws fail to systematically protect consumers against endocrine disruptors, in part as current risk evaluation methods largely overlook a chemical’s possible endocrine disrupting properties. In short, EDCs escape effective control despite the urgent need to reduce consumer exposure.

State of play in legislative procedure



In November 2018, the **European Commission** published a new EU strategy on endocrine disrupting chemicals. One of the aims of the strategy is to minimise overall exposure to endocrine disruptors. However, even though the strategy announces a ‘comprehensive screening of existing legislation related to endocrine disrupting chemicals’ (a Fitness Check) it fails to identify concrete actions, plans or timelines for achieving this objective.

Recommendations for the Presidency



Building on the 2017 Council conclusions on the sound management of chemicals, we call on the Finnish Presidency to facilitate an agreement within the Council on how the objectives set out in the EDC strategy should be further achieved without delay. The European Parliament report on how consumers can effectively be protected from these harmful substances should also be taken into account. In particular, we urge the Finnish Presidency to adopt ambitious Council conclusions on regulating EDCs in all consumer goods, based on clear objectives and observable deadlines. This topic has huge economic relevance for all Member States, as the diseases linked with environmental exposure to endocrine disrupting chemicals put a considerable strain on public health budgets.

What we need to succeed

- As a matter of urgency, the EU needs to develop a strategic plan for how to reduce overall consumer exposure to chemicals in products, including EDCs, in line with the commitments of the 7th Environment Action Plan. This plan should also describe how chemicals of concern across different sectors can be more quickly identified and dealt with. For example, if a chemical is identified as problematic in the context of toys it is also a problem for childcare products and should be regulated accordingly.
- A definition for ‘endocrine disruptors’ that is coherent and applicable to all existing and future EU legislation is needed. EDCs should be classified and regulated in the same way as chemicals that are carcinogenic, mutagenic or toxic to reproduction (CMRs).
- EDCs that have been identified as Substances of Very High Concern (SVHCs) should be included in Annex XIV of the REACH regulation. As a result, the use of these substances would require authorisation.
- The Cosmetics Regulation must be amended to ensure that consumers are protected against EDCs used as ingredients in cosmetic products.
- The presence of EDCs in consumer products must be made more visible. Better information about the use of known and suspected EDCs in products would allow consumers to make informed choices about how to protect their health.
- The EU should promote synergies between actions to protect consumers and the environment, the Commission’s Circular Economy action plan, and the Plastics Strategy to ensure that increased recycling does not perpetuate the use of harmful chemicals such as endocrine disruptors.
- As part of the 1999 EU strategy on endocrine disruptors, the European Commission identified a priority list of substances that require further evaluation regarding their role in hormone disruption. As this list was established several years ago, it needs to be updated in the light of REACH registration dossiers and other newly available data.
- Risk assessment and risk management methods must be updated to take into account the low-dosage effects of EDCs as well as the combined effect of different chemicals.
- More EU-funded research is needed in order to better understand the complexity of the endocrine system, as well as the effects of endocrine disrupting chemicals on human health and the environment.

ADDITIONAL SOURCES

Hormone-Disrupting Chemicals: When Will the EU Act against These Everyday Toxicants?
BEUC Position paper
[BEUC-X-2016-077](#)

Towards a more comprehensive EU framework on endocrine disruptors
BEUC comments to Commission roadmap
[BEUC-X-2018-069](#)

Top 10 Actions MEPs can undertake to lower the exposure of consumers and of the environment to endocrine disrupting chemicals
[BEUC-X-2011-040](#)

Endocrine disruptors throughout your day
Infographic
[BEUC-X-2019-037](#)

For more information: safety@beuc.eu



Trade

1

EU-US trade negotiations and regulatory co-operation dialogues

Why it matters to consumers

The United States is one of the EU's top trading partners. Reducing tariffs on industrial goods could be beneficial to EU consumers in terms of price reduction and enhancement of choice.

In parallel, improved dialogues between regulators from the EU and US could bring positive outcomes for consumers. However, the deregulatory trend in the US is a cause for concern in this respect.

State of play in legislative procedure



In April 2019, the **Council** authorised the opening of trade negotiations with the United States. Two negotiating directives have been adopted: one intending to eliminate tariffs on industrial goods and the other aiming for an agreement on conformity assessment. In addition, the Council revoked the TTIP mandate. The United States has not yet notified the EU whether or not it wants to engage in these new, smaller-scale negotiations. In the meantime, however, dialogues between regulators on certain issues have already begun. These negotiations follow the plan agreed upon by President Juncker and President Trump in July 2018.

Recommendations for the Presidency



We call on the Finnish Presidency to monitor the tariffs and conformity assessment negotiations as well as the regulatory dialogues with the United States. The Presidency should make sure that negotiations are conducted in a transparent manner and that the outcomes will benefit all consumers.

What we need to succeed

- Negotiations on industrial tariffs should contribute to lower prices and increased choices for consumers.
- A potential agreement on conformity assessment should include checks and balances to guarantee that products certified by US labs will comply with EU law and be safe for consumers.
- Regulatory co-operation must be carefully weighed against the current deregulatory trend in the US.
- Transparency must be ensured in both the trade negotiations and the regulatory dialogues.
- In the case that the US were to impose tariffs on EU cars, the EU must ensure that any retaliation does not put a disproportionate burden on consumers.

ADDITIONAL SOURCES

Trade negotiations and regulatory dialogues with the United States
BEUC and ANEC recommendations
[BEUC-X-2019-011](#)

Transatlantic Consumer Dialogue (TACD)
Positive Consumer Agenda:
New Rules for the Global Economy
Vision paper

2

World Trade Organization & e-commerce negotiations

Why it matters to consumers

E-commerce would not be the success it is without consumers: its continued growth depends on their trust in the market. This is why consumers must be at the heart of the e-commerce initiative by the World Trade Organisation (WTO). Any agreement, be it multilateral or plurilateral, must protect and deliver benefits to consumers.

State of play in legislative procedure

In December 2017, a group of WTO members launched an initiative called 'Enabling e-commerce' with the aim of exploring the possibility of a WTO agreement on e-commerce. In January 2019, 76 countries – including the EU 28 – announced the launch of plurilateral negotiations. The **Commission's** first engagement in the negotiations was in April: the submission of a proposal covering a large range of issues, from online consumer trust to telecoms, net neutrality and cross-border data flows.



In May 2019, the **Council** adopted complementary negotiating guidelines for these e-commerce negotiations, supplementing the existing WTO Doha Round mandate.



Recommendations for the Presidency

We call on the Finnish Presidency to ensure that the outcome of the WTO e-commerce negotiations will protect and benefit consumers. As the scope is likely to go beyond e-commerce, for example covering larger digital trade issues, we call on the Presidency to exercise caution. For instance, the EU should not put citizens' fundamental rights at risk. Sensitive issues for consumers – such as cybersecurity and artificial intelligence – must first be addressed in EU law. Otherwise there is a risk that weak levels of protection will be locked into the trade agreement. This would limit the ability of the EU to enhance consumer protection in the future.



What we need to succeed

- The negotiations should bring tangible benefits to consumers. Such benefits could notably come from voluntary provisions on online consumer trust, mirroring what the EU proposed to Australia and New Zealand. The agreement could go even further by calling for transparent and affordable telecom prices for consumers. There should also be political will for stronger co-operation between regulators dealing with consumer protection, from enforcement to product safety authorities.
- The EU must fully preserve its ability to protect citizens' personal data and privacy. It must not compromise on its horizontal position on cross-border data flows, data protection and privacy in trade agreements.
- On net neutrality, we call on the Finnish presidency to prevent any flexibility that would result in limiting access to internet for EU citizens.
- The EU should prevent the inclusion of rules related to cybersecurity in this plurilateral context. It should not limit its ability to regulate on cybersecurity nor promote self-regulation as an alternative. This is key to ensuring that connected products can become safer for people.
- The EU should ensure that WTO e-commerce does not prevent authorities from auditing automated decision-making processes by banning their access to the algorithms expressed in the source code of self-learning algorithms (i.e. artificial intelligence). This is key to preventing bias and discrimination, as well as to protecting people's fundamental rights.
- Negotiations about e-commerce should be transparent and should meaningfully engage civil society. Negotiating proposals and consolidated texts should be made public so that consumers know what is being negotiated on their behalf. The EU should encourage the co-conveners of the initiative to organise public briefings in Geneva.

ADDITIONAL SOURCES

WTO e-commerce negotiations
BEUC recommendations
[BEUC-X-2019-014](#)

International negotiations on e-commerce
(digital trade) at the WTO
[BEUC-X-2019-015](#)

3

Trade agreement with Australia and New Zealand

Why it matters to consumers

The goal of the ongoing negotiations with Australia and New Zealand is to “help to deliver jobs, growth and investment, benefitting EU businesses and citizens alike”. The agreement could benefit consumers if it is well designed, consumer oriented, and adapted to today’s public interest needs.

However, current trade agreements fail to fully achieve these objectives. Specific consumer issues often play only a minor role during the negotiation phase. Tariff reductions are often the only actual outcomes that could benefit consumers, but these reductions are usually not automatically passed on to them. Furthermore, tangible benefits – such as reduced telecom prices and geo-blocking practices and easy access to redress – are absent from current trade agreements. Consumer protection is not always guaranteed, and can be undermined by tools like regulatory co-operation and investment protection if the agreement is not carefully designed.

State of play in legislative procedure



In 2017, the **Commission** recommended that the **Council** approve the launch of the negotiations with both Australia and New Zealand. The European Parliament adopted resolutions in 2017 that supported the opening of trade negotiations with both countries under the condition that the highest level of consumer protection would be guaranteed. The Council authorised the Commission to open formal negotiations with both countries in May 2018. The negotiations were officially launched in July 2018.

Recommendations for the Presidency



We call on the Finnish Presidency to ensure that the talks with Australia and New Zealand will contain safeguards to protect consumers, and tools to bring them tangible benefits.

What we need to succeed

- The EU needs to convince its Pacific partners of the value of its positive proposals for consumers. For instance, the EU needs to remain firm on its willingness to enhance consumer trust online in the digital trade chapter. It should also insist on its approach to protect human health first and co-operate on antimicrobial resistance in the sanitary and phytosanitary chapter.
- The EU should ensure that its horizontal position on cross-border data flows, data protection and privacy in trade agreements remains non-negotiable. This is key to ensuring consumer trust in trade and preserving fundamental rights
- The EU's approach to good regulatory practices should be more cautious. It is worrying that the EU proposal aims to use a trade agreement to influence key decision-making processes such as public consultations and legislative reviews. We call on the Finnish presidency to prevent such incautious provisions that could limit the EU's ability to regulate in the public interest.

ADDITIONAL SOURCES

Australia
The consumer checklist for a positive
EU-Australia trade agreement
Factsheet
[BEUC-X-2018-051](#)

The consumer checklist for a positive
EU-Australia trade agreement
Position paper
[BEUC-X-2018-053](#)

New Zealand
The consumer checklist for a positive
EU-New Zealand trade agreement
Factsheet
[BEUC-X-2018-050](#)

The consumer checklist for a positive
EU-New Zealand trade agreement
Position paper
[BEUC-X-2018-052](#)

BEUC model for a consumer chapter in trade
agreements
[BEUC-X-2017-096](#)

For more information: trade@beuc.eu

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The European Consumer Organisation
Bureau Européen des Unions de Consommateurs
Europäischer Verbraucherverband

Rue d'Arlon, 80 Bte 1, B - 1040 Bruxelles

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- AT - Arbeiterkammer
- AT - Verein für Konsumenteninformation
- BE - Test Achats/Test Aankoop
- BG - Асоциация Активни потребители
- CH - Fédération Romande des Consommateurs
- CY - Kypriakos Sundesmos Katanaloton
- CZ - dTest
- DK - Forbrugerrådet Tænk
- EE - Eesti tarbijakaitse LIIT
- FI - Kuluttajaliitto – Konsumentförbundet ry
- FR - CLCV
- FR - UFC-Que Choisir
- DE - Stiftung Warentest
- DE - vzbv
- EL - EKPIZO
- EL - KEPKA
- ES - CECU
- ES - OCU
- HR - Unija potrosaca Hrvatske
- HU - Fogyasztóvédelmi Egyesületek Országos Szövetsége
- HU - Tudatos Vásárlók Egyesülete
- IE - Consumers' Association of Ireland (CAI)
- IS - Neytendasamtökin
- IT - Adiconsum
- IT - Altroconsumo
- IT - Consumatori Italiani per l'Europa
- LT - Lietuvos vartotojų organizacijų aljansas
- LU - Union Luxembourgeoise des Consommateurs
- LV - Latvijas Patērētāju interešu aizstāvības asociācija
- MK - Organizacija na potrosuvacite na Makedonija
- MT - Ghaqda tal-Konsumaturi
- NL - Consumentenbond
- NO - Forbrukerrådet
- PL - Stowarzyszenie Konsumentów Polskich
- PL - Federacja Konsumentów
- PT - DECO
- RO - Asociația Pro Consumatori
- SK - Združenie slovenských spotrebiteľov
- SK - Spoločnosti ochrany spotrebiteľov
- SI - Zveza Potrošnikov Slovenije
- SE - Sveriges Konsumenter
- UK - Citizens Advice
- UK - Financial Services Consumer Panel
- UK - Legal Services Consumer Panel
- UK - Which?



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