



# BEUC's 8 PRIORITIES

## for the Spanish Presidency



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## BEUC calls on the Spanish Presidency to champion better consumer contractual rights

Spain takes on the Presidency of the European Union at a very critical moment. The recent major changes to the EU political landscape – a new EU Parliament, a new European Commission and the adoption of the Lisbon Treaty – will need an initial settling in period. All these changes are happening in an unstable economic climate with major job losses and a significant downturn in the EU and world economies.

While measures have been taken to save undertakings and jobs, consumers are still waiting for measures to restore their confidence in the functioning of markets. One of the main objectives should now be to restore consumer confidence by guaranteeing an appropriate level of protection.

That is why we call on the Spanish Presidency to lead the work of the EU institutions related to the proposal for a **Directive on consumer rights**. By doing this, the Directive, currently intended to facilitate crossborder trade at too low a level of consumer protection as we see it, genuinely becomes a tool of consumer confidence. To achieve this, major improvements have to be brought to the design of the proposal itself, as the maximum harmonisation approach proposed by the Commission, combined with the low level of consumer protection, is not acceptable from the perspective of a sound consumer policy, neither at EU level nor at Member State level.

We also invite the Spanish Presidency to make progress on the following dossiers, to ensure that:

- More is done with regard to the safety of consumer products, with special regard to **dangerous chemicals**, particularly in the context of the upcoming revision of the **General Product Safety Directive**, or in respect to the unknown effects of **nanotechnologies** on health and the environment.
- More possibilities are available to obtain **redress** in case things go wrong. In this context, the availability of **collective consumer redress mechanisms** everywhere in the EU should be a priority for EU decision makers.
- **Consumer goods become more sustainable** and consumers are helped to make informed and more sustainable choices, and are therefore able to contribute to the fight against **climate change**.
- A high level of protection is guaranteed to all EU consumers in the area of **financial services**, particularly during economic downturns, and consumer interests are taken into account when designing measures to regulate financial markets.
- **Energy is accessible and affordable** for all European households. Informed choice between alternative sources of supply and energy is easy.
- Consumers have sufficient information to follow a **healthy diet**.
- Aggressive marketing of unhealthy food to children is addressed.

- Disguised **marketing of pharmaceuticals** is tackled.
- Access to **telecommunication services for all** and protection of **consumer rights in the digital world**.

With this in mind we have identified **eight main areas of concern** which we describe in this document, together with **numerous concrete proposals**. In the first semester of 2010, the Spanish government will be responsible for conducting discussions and negotiations on these dossiers. BEUC<sup>1</sup> and its Spanish members, Organizacion de Consumidores y Usuarios (OCU) and Confederacion de Consumidores y Usuarios (CECU), call on the Prime Minister and the members of his government to make these a matter of priority, and to measure concretely how its programme will benefit consumers.

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<sup>1</sup> BEUC, the European Consumers' Organisation, is the umbrella organisation for 43 of the most important consumer organisations in 31 European countries. It is our objective to represent and promote consumer interests with EU decision makers in all consumer relevant areas that match our members' strategic priorities.

## Objective Consumer contracts

### Strong rules to protect consumers online and offline

In October 2008, the European Commission adopted a proposal for a Directive on consumer rights (pCRD) which revises four consumer directives<sup>2</sup>, merging them into one instrument. The Commission's aim is to simplify and complete the existing rules on contracts between businesses and consumers buying products or services, and to reap the full benefits of the Internal Market.

The minimum harmonisation approach (according to which Member States are able to maintain or adopt stricter consumer protection rules) is currently being blamed for having brought about different rules in different countries, and discouraging cross-border trade: it is deemed too complicated for traders to adapt themselves to different national consumer rules. The Commission therefore proposes to abandon the minimum harmonisation approach and replace it with full harmonisation (where Member States would lose the possibility to adopt or maintain rules going beyond the protection provided by the EU instrument). According to the proposal, the introduction of full harmonisation in the field of consumer law is necessary to increase the still limited cross-border trade and promote consumer confidence.

Not only do legal barriers prevent consumers from shopping outside their countries, there are also difficulties with language, hesitations due to the fact that in case of defective products, consumers have to complain to a foreign – and distant – supplier, lack of cross-border redress facilities or fears regarding security and data protection on the Internet.

In addition, the proposal provides for maximum harmonisation at a low level of consumer protection. In our view, European consumers should not have to pay the price of losing essential national consumer legislation in exchange for a superficially attractive, "one-size-fits-all" approach, which is mainly in the interest of business and above all provides them with a level-playing field on a very superficial level only.

Given the lack of consumer confidence in online shopping, it is more important than ever to ensure that consumers are properly protected and that their rights are well respected.

The proposed Directive requires substantive changes before it can become a piece of legislation that provides added value to the development of the Single Market and takes into account the needs and expectations of consumers in the EU both now and in the future.

#### Actions to be taken:

- Before any decision on the proposed Directive is taken, hold an open, sincere and more nuanced discussion on the underpinning concept of the proposed Directive, in particular on the legal and economic impact of full harmonisation in consumer contract law including the costs and benefits of the proposed Directive. In this respect, further studies completing the existing impact assessment need to be carried out.

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<sup>2</sup> Directive on contracts negotiated away from business premises (85/577), Directive on unfair terms (93/13), Directive on distance contracts (97/7), and Directive on consumer sales and guarantees (1999/44).

- The role of the EC-Treaty principles of proportionality and subsidiary, in particular after the entry into force of the Lisbon treaty, should be taken into account more seriously.

Based on the outcome of these discussions and the additional information resulting thereafter:

- Ensure that the future Directive does not reduce but rather improves the rights of consumers, by setting a high level of consumer protection.
- Accept full harmonisation under the following conditions only:
  - Full harmonisation should only apply to technical and/or cross-cutting issues (such as the length of the withdrawal period, the conditions to exercise it, certain definitions such as the definition of a consumer and a trader for example etc.);
  - Its application does not result in a decrease of the level of consumer protection and ensures a truly high level of protection;
  - The scope of the fully harmonised field is clear from the text of the Directive so that legal certainty is provided.
- Clarify the links between the proposal and general contract law. Overall, the impact of the proposed Directive on general contract law at a national level needs to be assessed and clarified to avoid undesired spillover effects of the Directive into national civil law or unexpected interpretations of the European Court of Justice. Consequently, the fields of consumer guarantees for defective products and unfair contract terms, which are inseparably linked with (unharmonised) national civil law, should NOT be fully harmonised. We are furthermore worried that the proposal could lead to a situation where general contract law could evolve freely and be easily adapted to new market developments, providing for a higher level of protection in business to business relations than in consumer contracts, whereas consumer contract law would be isolated and frozen due to the ceiling imposed by full harmonisation, i.e. stopped from evolving any further.
- Adapt the existing consumer legislation to the digital environment. The proposed rules on information requirements, on remedies for lack of conformity and on unfair terms do not sufficiently take into account – or do not apply at all to – the particularities of digital products; consumer needs with regard to these products are therefore neglected.

#### **Further concrete demands to improve the proposal:**

- With regard to the rules on information requirements, clarify the relationship between the proposal (full harmonisation) and EC legislation and its impact on existing national laws in particular in the field of services contracts but also in relation to some specific goods (e.g. dangerous goods). Minimum harmonisation should apply as the general rule in this field.
- Introduce more consumer friendly rules on the starting point of the right of withdrawal (article 12), on the consequences of omission of information from the trader (article 13) and regarding the obligations of the parties in case of withdrawal (article 16 and 17). The proposed rules do not offer a high level of consumer protection.

- Delete some broad and unjustified exemptions from certain rights, such as the right of withdrawal for services contracts concluded at a distance in the case of e-auctions and for car rental and leisure services bought at a distance.
- Improve the provisions in relation to legal guarantees albeit maintaining minimum harmonisation: if adopted as they are, the proposed rules would reduce consumers' choice of available remedies if a product is faulty, and introduce a duty for consumers to notify a defect within a short period, which to date does not exist in many Member States. Also, in suggesting an EU wide guarantee period of two years, the proposal does not encourage the commercialisation of sustainable products.
- Apply the principle of minimum harmonisation to the rules on unfair contract terms. As they stand, based on maximum harmonisation, they would create important legal uncertainty and put at risk long established efficient national case law. Member States that have more extensive lists of unfair contract clauses would have to repeal these clauses from their black/grey lists. There is therefore a risk that in some Member States, contract terms currently considered as unfair – and therefore banned – would in the future have to be accepted. Finally, the rules on unfair contract terms should apply widely to all consumer contracts and be adapted to the particularities of digital products.
- Make sure the particular needs of disadvantaged consumers are covered, with particular regard to the provision of information.
- Introduce a rule establishing the direct responsibility of the producer in case of lack of conformity. The introduction of such a rule would help achieve the objective of the pCRD to promote consumer confidence in cross-border shopping e.g. by allowing consumers to seek redress from the producer for defective goods purchased from retailers in other EU countries.

## Objective Safety

**Safe consumer products - consumers and the environment  
protected against dangerous chemicals**

### **I. Safe products for consumers**

Unsafe CE marked products are often found and recalled from the EU market, even after having been purchased and used by consumers thus posing risks to health and safety that could have been avoided. The high number of RAPEX notifications shows that general and sector-specific product safety legislation ought to be revised and improved in order to adequately cover all risks that may be posed by products. More clarity is needed as to how the various product safety legislations in effect within the EU interact. Furthermore, manufacturers' responsibility needs to be strengthened and clarified. Last but not least, it needs to be ensured that the level of enforcement is the same across the EU and that market surveillance and control activities are both numerous and effective.

We are looking forward to the upcoming revision of the General Product Safety Directive. A Commission public consultation will certainly be launched before the end of 2009. The objective of the revision would be to review, clarify and update existing EU rules and try to have more flexibility in the Directive.

#### **Actions to be taken:**

- Continue to ensure a proper implementation of the new Toy Safety Directive at national level and evaluate the need to put in place a mandatory independent third-party testing (EC-type approval) for certain categories of products, for example products that have caused serious injuries in the past (such as toys containing magnets or making noise).
- Allow for the rapid adoption of permanent decisions by the Commission via Comitology under the GPSD to address, for example, newly identified and emerging risks. Introduce specific provisions for the use of hazardous chemicals in specific product groups. Stakeholders should be part of the decision process.
- Improve the efficiency of the RAPEX rapid-alert system by continuing to encourage Member States to notify dangerous products and better exchange information with third-countries including the US and China.
- Develop a consumer-friendly version of the RAPEX website where consumers would be able to easily seek information on notified products.
- Establish a (non-public) system through which all national consumer complaints related to product safety would be collected at EU level.
- Improve the traceability of consumer products.
- Require the Commission to draft a yearly report on market surveillance and standardisation activities, an analysis of the consumer complaints collected and the evolution of the level of general product safety in the EU. This report must be based on national reports that Member States should be asked to provide to the Commission every year. This report should be made publicly available.
- Strengthen market surveillance and improve coordination and collaboration across Europe between enforcement authorities and promote increased transparency and dialogue between Member States and between the EU and third-countries to ensure the safety of imported products.

## II. Ensure the safe developments of nanotechnologies and nanomaterials

Nanotechnologies are newly emerging technologies. Using nanotechnologies is like working on a scale ten thousand times smaller than the thickness of a human hair. Increased energy efficiency, a cleaner environment, more effective medical treatment and improved manufacturing production – there is a wide variety of existing and foreseen applications of nanotechnologies in various areas.

We acknowledge that some of these applications could bring benefits in particular for consumers' health and safety and for the environment. However, we are concerned about the potential adverse effects of nanomaterials on human health and the environment, both in the short and long term.

In this context, we are alarmed by the increasing use of nanomaterials in consumer products that are being sold on the European market without prior risk assessment. We are particularly concerned about products with which consumers come into direct contact on a daily basis (e.g. cosmetics and food products), and in products which lead to discharges to the environment. It is crucial that consumers are properly protected and can feel confident that any product containing nanomaterials (or made using nanotechnologies) on the market has been independently assessed and found to be safe before it is permitted to go on sale. In this context, we have high expectations with regard to the future EU action plan on nanotechnologies and nanomaterials that will be launched at the beginning of 2010. In 2011, the Commission will also have to respond to the European Parliament's Resolution on regulatory aspects of nanomaterials adopted in April 2009. This resolution called for various ambitious actions to be taken to ensure the safety of nanomaterials and nanotechnologies.

### Actions to be taken:

- Agree on clear definitions of nanomaterials and -technologies as the lack of definitions leads to legal uncertainties and hampers the development of regulatory requirements.
- Review and adapt, when necessary, all relevant legislation (such as REACH and product safety legislations) within the next two years in order to adequately address the potential risks of nanotechnologies for health and the environment.
- Promote the development of adequate safety and risk assessment methodologies taking into account all characteristics of nanomaterials.
- Impose a safety assessment and approval for all nanomaterials used in consumer products or in products that can have important impacts on the environment. The "no data, no market" principle should prevail.
- Establish an inventory of products containing nanomaterials on the EU market.
- Require manufacturers to label consumer products containing nanomaterials, in particular clothes, household and food products, as it will be done in the new Regulation for cosmetic products that will soon enter into force.
- Regulate misleading claims that are made on products that are marketed as containing nanomaterials.
- Prioritise funding and research towards environmental and human health and safety aspects of nanomaterials.
- Launch a public debate on nanotechnologies and nanomaterials with the Commission and Member States across the EU in order to ensure that citizens are involved in the safe and sustainable development of these technologies and materials.

## Objective Financial Services

### A dynamic Internal Market for retail financial services

The current financial crisis has clearly demonstrated that consumer rights have been systematically violated or simply not taken into account. Financial service providers have been focusing on enormous profits rather than providing services tailored to individual consumer needs. Consumers have lost confidence in deposit, credit and investment service providers, which weakens the basis of the Single Market and prevents cross-border shopping for financial services. The new rules on deposit guarantee schemes take no account of the Internal Market dimension of the issue. This could discourage consumers from cross-border shopping for financial services. The financial sector does not operate in a competitive EU market, far from it.

The current financial crisis has generated an atmosphere of general mistrust. One of the main objectives should now be to restore consumer confidence by guaranteeing an appropriate level of protection. This means that consumer interests should be taken into account within all initiatives that are being discussed to solve the crisis and avoid a new one.

#### I. Enhance financial supervision and regulation

In many Member States, national supervising authorities have not been capable of correctly detecting risks and imposing the necessary safety measures. Host state supervisors<sup>3</sup> have little or no influence over the regulation of passporting firms<sup>4</sup>. If national supervisors are not doing their job properly consumers are at risk. Cooperation between national supervisors with regard to the largest banking groups is supposedly already taking place, but smaller banks such as Landsbanki and Kaupthing bank seem to have slipped through the net. A number of outrageous financial swindles have been in the news recently (for example the Madoff scandal) which have obviously not been detected on time.

The Commission's recent legislative proposals establishing a European System of Financial Supervisors (ESFS) does not provide the new authorities with a real capacity of control and sanctions and does not take due account of the conduct-of-business side of supervision despite the fact that links between prudential supervision and consumer protection in the financial services area are so obvious.

#### Actions to be taken:

- More powerful and independent national supervisors are needed everywhere in the EU. Reflection should be launched on the necessity to separate prudential supervision on the one hand and the control of marketing methods and professional compliance on the other hand: clear definition of corresponding responsibilities of both supervisors to avoid conflict of interests.
- In order to provide better protection to consumers, national supervisory bodies should fulfill the following functions: participate in advertising control, control of financial information, control of unfair practices (bundled and tied products), control the distribution of financial products (for example in the area of

<sup>3</sup> Country in which a foreign service provider is doing business.

<sup>4</sup> Firms having an EU passport are allowed to work freely throughout Europe regardless of their place of establishment.

consumer credit), and take charge of an early warning system (inform consumers about the risks/risk category of various financial products on the basis of continuous enquiries).

- Since the development of financial services has led to the emergence of universal actors providing a wide range of financial services (for instance, together with their traditional role, banks offer more and more insurance services, investment products, etc.) it is not necessary to have a large number of supervisory authorities. A unique supervisor is needed to cover all financial services and all financial institutions (banking and non-banking). Therefore, there is a need to merge existing national supervisory authorities (bank/non bank credit, insurances, securities/pensions funds).
- Effective consumer representation on the boards of financial supervisors should be ensured. To this aim, consumer representatives should be provided with necessary means, e.g. sufficient financial resources.
- Strengthen the cooperation between national supervisors and regulators: create a binding network between them (see e.g. the Regulation on consumer protection cooperation).
- As financial systems and markets are becoming more and more integrated, it is necessary to create a financial supervision authority in charge of controlling the financial institutions operating at cross-border level whatever their size (Icelandic banks for example).
- Coherent legislation to avoid regulatory arbitrage between financial products. The French Financial Markets Regulator (AMF - Autorité des Marchés Financiers) issued a report which clearly illustrates this problem. Structured investment products sold by most banking systems are in competition with UCITS and life insurance contracts. Even if these three categories of products are broadly substitutable, their respective regulations, if any, are totally incoherent.
- Adopt binding rules at EU level so that all Member States are obliged to comply with them. Soft law has shown its limits especially in case of financial services. The regulatory gaps must be closed.

## II. Pre-contractual information on financial products and services

The crisis made it even more visible that pre-contractual information offered to consumers is not adequate. Consumers have access to information which is often very long and not consumer-friendly (consumer-oriented), which does not help them compare products and make the right choice.

### Actions to be taken:

- Provide information to consumers well in advance of contractual decisions.
- Make information shorter (no more than 2 pages) but understandable, structured, and with comparable relevant information on all the key features.
- Create a single risk indicator for investment products. Such an indicator should include the following information:
  - Whether or not the invested capital is guaranteed;
  - Investment volatility;

- Information on suggested retention period for the expected return to compensate for the volatility risk.
- Introduce stricter rules on marketing and advertising practices especially for investment products.
- Develop the concept of simplifying and standardising financial services, with features that can be easily recognised and compared.
- Ensure that the provision of information is not misused by the service provider to avoid his responsibilities (responsible lending, responsible advice, etc.).

### III. Financial advice

Financial products are more and more complex. The current crisis has unveiled the problems consumers have to face: even enlightened consumers have not been able to understand the financial products offered to them (see Madoff's clients). Moreover, everywhere in the EU there is a lack of independent advice that consumers can rely on. Advice is in general only given by financial service providers and is often not tailored to consumers' needs and expectations but is rather linked to the bank's commercial interests. This leads to a detrimental situation for consumers.

#### Actions to be taken:

- Independent advice is necessary to prevent consumers from taking unwise decisions, especially in case of major financial decisions:
  - Funding for independent advisors: should be provided partly by public authorities and partly by consumers. In any case, independent advice should be provided at affordable rates;
  - Advice could be provided by consumer organisations or other independent bodies.
- Responsibility of advisors (service providers and independent advisors):
  - Set up a MiFID profile (Markets in Financial Instruments Directive) for each investor. If the product does not match the profile, consumers should receive a warning;
  - Ensure information given to consumers is reliable;
  - Effective documentation of the advice should be given to the investor;
  - Make it easier for consumers to claim compensation (the burden of proof should lie with the advisor).
- Binding rules applicable to all financial advisors at EU level.

### IV. Credit - Responsible Lending

Irresponsible lending is one of the main causes of the current financial crisis. As a result, more attention should be paid to this issue. Lenders should be obliged to assess the financial capacity of consumers asking for a credit and check their creditworthiness. All financial service providers, credit products and distribution channels of these products must behave responsibly and be regulated to achieve a high level of quality.

#### Actions to be taken:

- Regulate variable interest rates to protect consumers from a potentially increasing interest burden:
  - Cap variable interest rates to limit interest rate variations;
  - Improve information on variable rates;
  - Prohibit promotional rates, i.e. attractive (or fixed) interest rates that switch to higher (or variable) interest rates after a certain period of time.

- Foster consumer protection and responsible behaviour of credit institutions with legislation on mortgage credit: if the bank's decision is based on a poor quality assessment of the consumer's financial situation the costs of irresponsible lending should be taken on only by lenders and not by consumers (see Belgian law on responsible lending).
- Regulate crediting activities that seriously endanger the solvency of consumers (foreign currency credit, credit secured with mutual funds, Lombard credit, revolving credit, etc.) as well as usury rates and excessive costs.
- Accompany and evaluate the implementation of the Consumer Credit Directive with a specific focus on the level of consumer protection (including the regulation of credit distributors), a responsible credit business and necessary adjustments in the future and monitor specifically the transposition and implementation of Article 8 (lender's obligation to assess the creditworthiness of the consumer).
- Adopt binding measures for all financial intermediaries and ensure due supervision: registration with a competent authority in the home Member State; possession of appropriate professional knowledge and ability; possession of professional liability insurance.

## V. Deposit Guarantee schemes

Deposit guarantee schemes currently work extremely inadequately at cross-border level, especially in the case of banks which have the European passport<sup>5</sup> in their home country but conduct 99% of their business cross-border. No lessons have been learned from the current crisis: the new rules do not take into account the Internal Market dimension of the issue. This could discourage consumers from cross-border shopping for financial services. We expect that the public consultation recently run by the Commission will lead to an appropriate legislative proposal.

### Actions to be taken:

- Make deposit guarantee schemes work cross-border:
  - Consumers' deposits should be equally guaranteed across Europe, whatever the service provider's location;
  - Payout procedure should be as easy as it is at national level, especially in terms of delay.
- Ensure maximum harmonisation of deposit guarantee schemes with complete coverage of deposits all over the EU, in order to avoid an uneven competition among schemes.

## VI. Harmonisation of legislation on financial intermediaries

Many financial intermediaries sell complex financial products without having any qualifications and are not accountable in case of failure of the product.

### Actions to be taken:

- Introduce rules to limit initial commissions.

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<sup>5</sup> Banks having an EU passport are allowed to work freely throughout Europe regardless of their place of establishment.

- Ensure harmonisation of rules for intermediaries, regardless of what they are selling.
- Introduce rules on registration, qualification, transparency, liability and insurance.

## **VII. Impose access to a minimum service for all consumers**

Financial exclusion is a problem for many European consumers, principally in the newer Member States. The result is that they do not have access to any basic financial services (current account, savings accounts, insurance). This often leads to social exclusion. There is also a European cross-border dimension to financial exclusion as a citizen who wishes to settle abroad must often overcome a real 'banking headache': in order to be able to open a bank account in a Member State, a consumer must reside there; at the same time, in order to rent or obtain housing a bank guarantee must be provided.

### **Action to be taken:**

- Recognise the right of citizens to have access to basic banking services with a European scope.

## **VIII. Facilitate payment services**

From lack of information to banks that try to dodge their obligations in the event of card theft to excessive fees on cross-border transfers, opaque and excessive bank fees and tied and bundled products that reduce possibilities of switching, we have all faced a problem with our payment services provider.

### **Actions to be taken:**

- Ensure the correct implementation of the Directive on Payment Services which aims to make
  - Domestic and cross-border payments reasonably inexpensive but also secure and practical;
  - Cross-border payments as efficient as domestic payments.
- Ensure that the Single Euro Payment Area (SEPA) provides concrete advantages to consumers.
- Ensure the implementation of the revised Regulation on cross-border payments in Euros.
- Binding measures increasing consumer rights when buying financial services by distance selling means.
- Binding measures on prevention of fraud covering all types of means of payment including e-payments and mobile payments.

## Objective Energy and Sustainability

### I. Promoting access, choice and affordable prices for all consumers

#### a) Towards a competitive energy market and non-misleading “green” claims

The European energy market has been liberalised for more than two years and yet consumers are still not benefiting from real competition. In a survey carried out by BEUC on the functioning of the European gas and electricity markets, published in 2008<sup>6</sup>, BEUC's members identified in particular the lack of real choice, difficulties to switch suppliers and unclear bills as major concerns.

Choice is a fundamental consumer right and is the prime feature of a competitive market. The Third Energy Package aims to make Europe's energy markets more competitive and gives consumers the right to switch faster, obtain their personal data and be more regularly informed.

Consumers and energy suppliers periodically ‘communicate’ through the bills sent and received. Bills should make it possible for consumers to check what they pay for in exchange for the services they use and that they receive information about their consumption. Furthermore, they are the starting point to compare other offers. We welcome the work that has been carried out by the Citizens Energy Forum on transparent energy billing and hope that the recommendations defined by the Forum in September 2009 will be shortly implemented by industry.

In addition, climate change and its impact are prompting many consumers to reconsider their habits. Yet consumers can only make decisions in favour of sustainable consumption if reliable information in the area of green energy offers is available, if procedures to switch operators are made easier and if prices are affordable.

#### Actions to be taken:

- Ensure a swift implementation of the 3<sup>rd</sup> energy package. Regulators should be as powerful as the companies they are regulating. They should be independent and take impartial decisions.
- Investigate ways to separate the ownership of production from that of energy distribution (described as ‘full ownership unbundling’) to make entry into the European energy markets for new suppliers easier.
- Ensure offers on the market are comparable and understandable for consumers. Offers which claim ‘positive’ environmental effects should indeed bring environmental benefits when consumers opt for these products and services.
- Ensure consumers can have access to their actual consumption, notably through smart metering.
- Ensure changing supplier is possible within a maximum of one month.

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<sup>6</sup> The full results of the study are available at [www.beuc.eu](http://www.beuc.eu)

## b) Consolidate and implement consumer rights

Apart from a lack of real choice and difficulties in changing supplier, BEUC's energy survey also identified problems with unclear bills, non-cost-reflective payment methods and difficulties for consumers to assert their rights. These findings are in line with the ERGEG (European Regulators Group for Electricity and Gas) report on the transposition of consumer rights, published in October 2008. The right to clear and more regular billing and cost-reflective payment methods is already written into the Electricity, Gas and Energy Services Directives.

As energy is fundamental for every single consumer in the Internal Market, attention should be paid to the vulnerable groups in our society. The Spanish Presidency has the opportunity to establish the basis on which the new European Parliament and the following Presidencies of the European Union can work. We all need energy and we do not have the option not to use it, yet not everyone has access to it. Energy poverty is taking on dramatic proportions.

### **Actions to be taken:**

- Allow the European Commission to develop guidelines for the implementation of Annex A of the Electricity and Gas Directives<sup>7</sup>.
- Reinforce and implement consumer rights through a comprehensive and binding instrument (including compensation in the event of interruption of supply, the right to representation and user-friendly complaint mechanisms).
- Ensure access to energy also for the most vulnerable consumers, notably by providing social tariffs to vulnerable consumer groups.

## **II. Promote sustainable choices through efficient measures and useful tools**

### a) Encourage more sustainable design of products and take the least sustainable products off the market

More and more consumers are ready and willing to buy more sustainable products, in particular more energy efficient ones, in order to reduce their impact on the environment. In addition, there is an urgent need for reducing energy consumption and the use of natural resources in the European Union and to move towards sustainability. In this context it is essential to impose strict and ambitious product standards, and to increase the number of sustainable products on the market. Yet the current Directive on Ecodesign, defining the principles, conditions and criteria regarding ecological requirements in product design, is limited to consumer energy-using products and their energy use.

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<sup>7</sup> Annex A of Directive 2003/54/EC and Directive 2003/55/EC sets a series of consumer rights including receiving transparent information on applicable prices, tariffs and standard terms and conditions, having at their disposal a wide choice of cost-reflective payment methods, benefiting from transparent, simple and inexpensive procedures for dealing with consumer complaints, being informed about the right to withdraw from the contract when contractual conditions are changed, being supplied with gas of a specific quality at reasonable price and with electricity at reasonable, easily and clearly comparable and transparent prices.

In the summer of 2008, the Commission presented its much awaited Action Plan on Sustainable Consumption and Production and Sustainable Industrial Policy (SCP/SIP).

**Actions to be taken:**

- ✿ Ensure that the initiatives announced and the measures in the context of the SCP/SIP Action Plan are properly undertaken. It should involve all economic actors including industry, consumers and governments, and lead to the setting of ambitious regulatory goals in particular in relation to sustainable product standards.
- ✿ Elaborate specific eco-design requirements for the various product categories which would allow to regularly eliminate unsustainable products from the shelves, for example the highest energy-consuming products or products with the worst environmental performance.
- ✿ Promote the crucial role of retailers in sustainability and notably in 'choice editing' i.e. the withdrawal of non-sustainable or less sustainable products from the shelves in favour of a broader range of sustainable products and services in all price ranges. This should be done within the Retail Forum which was set up by the Commission in March 2009. Ambitious objectives will have to be set up by the participants and independent monitoring of progress will need to be undertaken regularly – possibly by consumer organisations. If no progress is made, the Commission should take stricter measures to ensure that retailers actually play their role.

b) Promote clear and objective information on sustainability-related aspects of products

Even if consumers wish to turn to more sustainable products, the lack of clear, reliable and comparable information and the vast number of 'green' labels and self-claims used by industry without third-party verification often prevent them from acting.

The EU A-G Energy Label has been one of the few labels that has really pushed the market towards more energy-efficient domestic appliances, notably thanks to its simplicity, transparency and user-friendliness for consumers. A survey of 7,000 people across Europe commissioned by BEUC and other partners and published in May 2008<sup>8</sup> shows that between 97% and 99% of respondents identified "A" as the most energy-efficient household appliance. Other research work<sup>9</sup> carried out on behalf of the Swedish government (published in December 2008) showed again the clear preference of consumers for the A-G label layout compared with alternative proposals made by the Commission such as a double scale of letters and numbers. These results have been confirmed and extended by a study from the University of Sankt Gallen<sup>10</sup>. On the other hand, the Commission recently provided stakeholders with the results of a consumer survey showing that interviewed consumers would prefer an open-ended scale and in particular a scale with A<sup>+</sup> and A<sup>++</sup> classes on top of the A class. We however have

<sup>8</sup> ANEC, BEUC, Consumer Focus (formerly UK National Consumer Council), the UK Energy Saving Trust and the UK Department for Environment, Food and Rural Affairs (DEFRA) asked Ipsos MORI to carry out empirical research concerning consumers' perception of the A-G Energy Label. See: [http://www.mtprog.com/spm/files/download/byname/file/Full\\_MORI\\_summary.pdf](http://www.mtprog.com/spm/files/download/byname/file/Full_MORI_summary.pdf)

<sup>9</sup> Research on the consumer perception of the Energy Label and on a possible change of the layout carried out by Ipsos MORI on behalf of the UK, Dutch and Swedish governments and published on 16 December 2008. The research comprised two focus groups in each of six markets (UK, France, Netherlands, Italy, Poland and Sweden). See: <http://www.mtprog.com/cms/library-publications/>.

<sup>10</sup> Heinzle, Stefanie and Wüstenhagen, Rolf: Consumer survey on the new format of the European Energy Label for televisions - Comparison of a "A-G closed" versus a "beyond A" scale format, St. Gallen, August 2009.

strong reservations with regard to these findings as many other studies and surveys have shown the complete opposite. The Commission will soon come up with a new proposal for the future energy label layout. We will therefore continue to call for the A-G well-known layout to be maintained.

**Actions to be taken:**

- ✿ Give consumers the possibility to act in a more sustainable way when they purchase, use and dispose of products, by providing them with easy tools such as the A-G Energy Label and the Ecolabel.
- ✿ Recognise the European Ecolabel as a label of environmental excellence following a full life-cycle approach and promote the launch of an awareness-raising campaign at European level to familiarise consumers with it.
- ✿ Make the Energy Labelling scheme more dynamic, so that it can be easily adjusted to new developments on the market (for example by updating the criteria for the various label categories), whilst maintaining the current closed label design with classes from A to G.
- ✿ Ensure greater consistency between eco-design and the various EU eco-labelling schemes (in particular, existing ones such as the EU Ecolabel and the Energy Label).
- ✿ Promote sustainable products and more sustainable consumption through better targeted information campaigns (i.e. taking into account behavioural research).

## Objective Group Action

### How to make consumer rights a reality

Whilst existing legislation must be enforced and reinforced to improve the situation of consumers, this is not enough. Consumers must be in a position where they can implement the rights which they have been granted.

Very often, several consumers, possibly from different Member States, are victims of faulty or even dangerous goods or services, or of anti-competitive business practices. Individual actions are not an appropriate remedy, as the litigation costs involved are much higher than the compensation the affected consumers are entitled to.

A European Group Action is essential to enable groups of consumers to secure compensation for a loss resulting from the same trader by combining their claims into one single action. Currently, situations across the 27 EU Member States vary significantly. While in some countries collective redress mechanisms exist, its efficiency no longer needs to be proven. The integration of European markets and the subsequent increase in cross-border activities highlight the need for EU-wide consistent redress mechanisms.

Group Action does not grant any new rights to consumers. It only provides new means to enforce existing rights. Moreover, it does not impose any additional burden on companies. Experience from those Member States that already have collective redress mechanisms in place clearly demonstrates that European legal traditions provide for the necessary safeguards to avoid any abuse of the system. On the contrary, group actions will benefit those companies that respect consumer legislation. Europe needs and is ready for Group Action.

#### Actions to be taken:

- Define and put in place, as soon as possible, and in cooperation with the European Institutions, a European-wide group action for violations of consumers' interests in order to:
  - Give consumers access to justice in cases where individual redress is not suitable;
  - Ensure effective access to justice to all EU consumers irrespective of their nationality or country of residence;
  - Foster enforcement of consumers' right;
  - Minimise litigation costs for both consumers and defendants;
  - Reduce overloading of courts;
  - Reduce inequality between consumers residing in different Member States as some can and others cannot benefit from group actions;
  - Overcome difficulties for business due to varying national redress mechanisms leading to market distortions;
  - Improve the functioning of the Internal Market, as consumers will be much more confident to shop abroad.
- Support the adoption of a Community Directive on private damages actions that is open to victims of such practices with the aim of giving effect to the right to compensation for victims of anti-competitive practices, and make it possible for consumer organisations to bring claims on behalf of all victims.

## Objective Food

### Healthy food for informed consumers

#### I. Help consumers to make informed choices

In some EU countries, over half of the adult population is overweight, and one child in five is obese. Cardio-vascular disease is the cause of almost half of the total deaths in Europe, and almost one third of these cases are due to diet. Type II diabetes, which is also closely linked to diet and obesity, is also on the increase. Although the solution to the problem of obesity involves many factors, it remains that diet plays a key role.

Even if more consumers are becoming aware of the link between what they put on their plates and the effect this has on their health, they are often bewildered when they look at the labels on food products. Either the nutritional information is incomplete or difficult to use – consumers are faced with different simplified labels on the front of the packaging which makes it difficult to make comparisons between products – or they are misled about the nutritive value and benefits of products through the use of exaggerated or false claims.

How can the right choices be made in these circumstances?

#### Actions to be taken:

- Make healthy products more available and more readily accessible to all consumers, paying particular attention to disadvantaged groups.
- Make it compulsory to include complete, back-of-pack nutritional information on the 'Big 8' nutrients (protein, energy, fat, saturated fats, carbohydrates, sugar, salt and fibre) as well as trans fats.
- Impose mandatory simplified front-of-pack labelling which is easy to understand and compare, showing the levels of key nutrients from a public health perspective (fats, saturated fats, sugars and salt). The use of a multiple colour coding system (green, orange and red) would show at a glance whether the amounts of these nutrients are low, moderate or high, and could be complemented by Guideline Daily Amounts (GDAs).
- Improve the legibility of the labels, in particular with regard to the size of the print and the contrast between the lettering and the packaging background.
- Introduce mandatory country of origin labelling, not only on foodstuffs consisting of a 'single' ingredient but also for 'significant' ingredients and 'characterising' ingredients in foodstuffs made from several ingredients.
- Ensure that strict nutrient profiles are developed in an independent and transparent manner by the Commission which reflect the objective of the health claims Regulation. Nutrient profiles are essential as they will determine which food products can or cannot bear a health or nutrition claim and should enable consumers to trust those claims which are made on the products they buy.

#### II. Protect children as a matter of priority

European Commission figures show that 14 million children in Europe are either overweight or obese. Studies by our member organisations show that most advertisements for foods and drinks targeting children are promoting products which are high in fat, sugar or salt.

Alongside 'conventional' advertisements in magazines or on TV, we are now seeing adverts on the Internet, via sponsorship of sports gear in schools, in product placement at the cinema or in SMS competitions. This puts unacceptable pressure on children – and their parents – to make them eat unhealthy food, and goes against all declarations made by EU decision-makers in support of the fight against obesity.

**Actions to be taken:**

- Introduce a ban on TV advertising of food and drinks which are high in fat, sugar or salt from 6 am to 9 pm (based on the nutritional profiles to be defined by EFSA).
- Extend the restrictions on the advertising of food products to children to cover all forms of marketing techniques (e.g sms, viral marketing).
- Promote the adoption by the industry of the "Code on the marketing of food products and non-alcoholic drinks to children"<sup>11</sup> proposed by Consumers International, pending the setting up of a binding measure at European level.

**III. Keep the level of food safety as high as possible**

Thanks to the work of EFSA and the application of, among others, the HACCP<sup>12</sup> principles, the European Union has a reliable, scientific basis recognised at international level to guarantee its consumers the safety of the food they buy.

Under pressure from the United States, the Commission proposed to authorise the use of certain chemical substances for the antimicrobial treatment of poultry. Such a situation would lead to an unacceptable relaxation of the hygiene measures applied during production, transport and slaughter, particularly in the case of imported products. The US has decided to challenge the decision of EU Member States to reject the proposal and to pursue this issue with the WTO.

New technologies in food rearing and production processes may have an impact on food safety. Although consumers can benefit from these innovations, competitiveness and innovation must not be allowed to take priority over public health and safety.

**Actions to be taken:**

- Oblige all food companies, including small businesses, to apply the HACCP principles.
- Defend the principle of respect for the rules of hygiene 'from farm to fork' and categorically reject their replacement by 'chemical' treatment at the end of the production chain.
- Include on the list of 'novel' foods all those originating from a production technology not previously used, such as foods derived from plants, produced by non-traditional growing methods or modified by new production processes, such as nanotechnology and nanoscience.
- Ensure that all novel foods undergo a complete evaluation of their safety before being authorised on the European market.
- Ban animal cloning for food purposes.

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<sup>11</sup> Recommendations in favour of a Code relating to the marketing of food products and non-alcoholic drinks to children, Consumers International, March 2008.

<sup>12</sup> The HACCP system consists of Hazard Analysis and Critical Control Points in food hygiene.

## Objective Health

### Put in place a coherent and ambitious health policy at European level

Health is a fundamental human right. Decision makers must ensure that public health is protected and guarantee access to high quality and efficient health services. At EU level, pharmaceutical policies should be fully integrated into health policies and competence on medicines should be shifted within the European Commission from DG Enterprise to DG Health and Consumers.

#### **I. Better health information**

Patients need better information on diseases, treatment options and medicines. This information should be reliable, non-promotional and comparative. In order for consumers to be able to make an informed choice, it is imperative to maintain a clear distinction between information and advertising.

##### **Actions to be taken:**

Develop a health information strategy which:

- Is based on an in depth assessment of consumers' information needs, on the way these needs are currently met and on any potential improvements.
- Promotes reliable sources of information.
- Allows consumers to choose and compare medicines and different treatment options.
- Addresses inequalities in access to information from a wide public health perspective.

#### **II. Safety of consumers in relation to side effects of medicines**

Medicines save lives but can also have adverse effects which may sometimes prove to be fatal. To ensure patient safety, it is therefore of the utmost importance to have an efficient, transparent and proactive pharmacovigilance system.

##### **Actions to be taken:**

- Enable consumers to report side effects directly to the competent authorities.
- Put in place efficient pharmacovigilance procedures, with strict rules in case of non-compliance.
- Maintain strict criteria to grant (conditional) marketing authorisations.
- Grant the public greater access to pharmacovigilance information.
- Undertake independent research and post-approval safety studies on the potential long-term effects of medicines.
- Conduct public information campaigns to draw attention to the importance of reporting side-effects.

### **III. Protect consumers from counterfeit medicines**

Counterfeit medicines can be very dangerous for health. It is important that the supply of medicines is safe, more strictly monitored and more transparent.

#### **Actions to be taken:**

- Introduce safe track and trace technologies that do not generate an additional cost for consumers.
- Put in place specific measures against illegal sales of medicines on the Internet.
- Educate consumers about the risks posed by counterfeit medicines.
- Reinforce international cooperation.
- Impose stronger sanctions on counterfeiters.

### **IV. More certainty on patient rights**

It is essential for European consumers, who are increasingly mobile, to know what their rights are in the area of health services, both in their country of residence and abroad.

#### **Actions to be taken**

- Ensure that consumers have access to high quality health care services, are aware of their rights and have the means to enforce them in all Member States.
- Establish a clear legal framework for patients' rights in cross-border health care, namely on reimbursement, information provision, redress in case of problems and continuity of care.
- Ensure that the existing social security legislation on cross-border health care is effectively implemented.

### **V. E-health for the benefit of consumers**

There is no agreed definition of e-health but it arguably includes a wide range of tools based on information and communication technologies (ICT) used in the prevention, diagnosis, treatment, monitoring and management of health. It also includes amongst others health information networks, electronic health records or telemedicine services. Major progress has been made in this area. All European consumers should benefit from the opportunities that ICTs can provide to the healthcare sector.

#### **Actions to be taken**

- Ensure that new e-health applications bring concrete and tangible benefits to consumers.
- Take account of the patient's perspective in decisions regarding e-health.

## Objective Digital & Telecoms

**Empower consumers to play a central role in a safe, fair and competitive digital market**

Information and communication technologies (ICT) have significantly changed consumption habits and make up an increasingly large part of household budgets. Although these technologies offer citizens a must-have tool to access information and participate in daily life, they are also giving rise to violations of a number of fundamental rights.

### **I. Ensuring access to telecommunication services for all**

#### a) The Review of the scope of universal services in telecommunications should allow all European citizens to have access to these services

E-government, e-health, e-business, user-generated content, e-learning such as online encyclopaedias and courses, job sites, websites to compare energy prices, social networks, etc. These are only but a few of the new services which broadband has made feasible. Driven by the increasing penetration rates – 50% of European households are using broadband now<sup>13</sup> – and increasing speeds, these services have become widespread. At the same time, not having access to these services leads to social exclusion.

The European Commission has announced a public consultation on the scope of the universal service provision in the telecommunications sector in the second half of 2009. As far as BEUC is concerned, we believe that it is time to widen the scope of universal services to broadband and to analyse whether at this stage, mobile telephony should also be included.

#### **Actions to be taken:**

- Stimulate a wide debate on the review of the scope of universal services in telecommunications focusing on the opportunities these services bring for all and what it means when consumers do not have access to them.
- Promote the inclusion of broadband in the scope of universal services in telecoms.
- Analyse to what extent mobile telephony should be included in the scope of universal services in telecoms.

#### b) Ensuring the Internet remains open and neutral

Over the past few years the European Parliament and the Council have extensively debated the update of the telecommunications regulatory framework. The aim was to guarantee healthy competition, leading to a significant decrease in retail prices and better quality services.

In this context, more attention should be paid to the "network neutrality" principle; Internet Service Providers, telecom operators and content providers are increasingly vertically merging and cooperating so that they are technically capable of limiting

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<sup>13</sup> Eurostat 2008

access to content, to services or to applications which could represent competition for their own services.

It is critical to reinforce the powers and independence of national regulatory authorities, which must be able to intervene to protect consumer interests. This is all the more important if we take into account the inherent threat of abuse of dominant positions within network industries.

**Actions to be taken:**

- Ensure that telecom networks and service providers guarantee subscribers the right to access, send and receive any content and to use any service or application without discrimination against the latter's provider.
- Strengthen the implementation powers and independence of the National Regulatory Authorities, within which consumer interests must be adequately represented.

**II. Protect consumer rights in the digital environment**

Digital technologies have given rise to new ways of promoting, buying and receiving goods or services. There is practically no area of consumption that is not affected by the rapid development of modern information and communication technologies. The Internet is also an essential way of accessing knowledge and online services (such as administrations or health services) as well as the public and democratic debate. It must therefore be ensured that consumer rights are really applied in the digital world.

**Actions to be taken:**

- Recognise and enforce the six basic consumer rights in the digital world:
  - Right to choice, knowledge and cultural diversity;
  - Right to the principle of "technological neutrality";
  - Right to benefit from technological innovations without abusive restrictions;
  - Right to the interoperability of content and devices;
  - Right to the protection of privacy;
  - Right not to be criminalised.
- Support the European Commission's "Digital agenda" that highlights and aims to tackle challenging areas for consumers, such as territorial discrimination and unfair privacy policies, through legislative measures to ensure consumer confidence online.

In particular, the two following issues should be high on the Spanish Presidency agenda:

a) The protection of personal data and privacy

The Internet opens the door to potential violation of the right to privacy without precedent. New technologies (including behavioural advertising and deep packet inspection techniques) and new digital content platforms (for example social networking sites) in particular allow players from the private sector to identify consumers by collecting and using their personal details and invading their privacy without their knowledge and approval. These same data are also exposed to online crime, such as ID theft and/or the diversion of sensitive information. In addition, all

these new technologies encroaching upon consumers' privacy are likely to be decisive in the development of "ubiquitous computing" also referred to as "the Internet of Things" (the integration of IT into the environment and everyday objects). Its deployment could lead to a series of negative consequences for privacy (for example locating, targeting and profiling consumers) and security (for example theft, viruses, electronic eavesdropping).

**Actions to be taken:**

- Impose transparency, consumer control and respect of consumers' choice online in the use of new technologies likely to have an impact on consumer privacy.
- High privacy and security to be the default setting for digital products ("privacy and security by design").
- Require companies to take the appropriate measures in order for telecom networks to be secure and reliable.
- Ensure that Internet Service Providers offer consumers adequate technology to resolve security issues, at reasonable prices.
- General obligation to inform/notify consumers of any violation of security that compromises their personal data ('horizontal breach notification').
- Give consumers access to efficient complaint and redress mechanisms in case their personal data have been compromised.

**b) Intellectual property rights (IPR) and "graduated response"**

We fully acknowledge the need to ensure the protection of IPR – especially on the Internet – and for artists to get a fair remuneration for their works. We are fiercely opposed to the solution towards which France and other Member States seem to be moving, i.e. the "Graduated Response" according to which rights holders could ask Internet Service Providers to threaten to suspend Internet access for the presumed infringers of intellectual property rights. Whilst copyright must be respected, the same applies to the elementary consumer protection rights such as the right to fair licence conditions and the constitutional principles of respect for privacy, confidentiality of communication and due process.

We strongly believe that instead of focusing on repressive enforcement measures, more attention is needed with regard to the fostering of innovative business models that would provide legitimate content online. The establishment of an efficient and well regulated licensing system would contribute to the significant reduction of unauthorised use of copyright-protected works.

**Actions to be taken:**

- Acknowledge the distinction between counterfeiting/piracy and practices carried out by numerous private consumers, at home, on a small scale and without commercial motivation. In particular when it comes to criminal sanctions, it should be made clear that such sanctions can only apply to commercial infringers. A clear definition of the "commercial scale" is necessary to avoid divergence in the implementation by Member States and increase legal security.
- Respect elementary principles of consumer protection such as the right to fair licence conditions and respect for privacy and due process.
- Provide clarity as to the scope of the private copying exception and assess the effectiveness of the current systems of private copying levies as form of fair

compensation. It is essential to ensure alternative systems of fair compensation are being explored that would be best suited to the challenges of the digital environment and would compensate right holders for the actual economic harm suffered.

- Oppose any attempt to introduce the responsibility of the Internet Service Providers in terms of policing copyright violations: such a measure would be disproportionate, inefficient and, more importantly, would violate certain fundamental rights such as the right to the presumption of innocence, to a fair trial and to the protection of personal data. Numerous harmful effects are also reported in practice, such as the identification of a computer rather than the person responsible, and the application of very strict rules, despite the fact that the distinction between legal and illegal downloading is far from simple and cannot be made automatically.
- When discussing content online, reflect on new business models and possible measures at European level in order to enable inventors or designers of intellectual works – including users – to legitimately and fairly benefit and create value for their work, without consumers being unfairly wronged in the exercise of their own rights. In this respect, numerous creative avenues are to be explored and developed, such as increasing legal offers available online; adopting new types of licence or financing; and the use of interoperable technologies, etc. Regulatory measures are necessary in order to foster the availability of content online, including the promotion of multi-territory licensing, enhanced transparency in the management of copyright, efficient solution to the problem of orphan works, the assessment of the economic impact of the current system of exceptions and limitations, the adoption of rules on creative content, etc.

AT - Verein für Konsumenten-information - VKI  
 AT - Arbeitskammer - AK  
 BE - Test-Achats/Test-Aankoop  
 BG - Bulgarian National Consumers Association - BNAP  
 CH - Fédération Romande des Consommateurs - FRC  
 CY - Cyprus Consumers' Association  
 CZ - SOS - Consumers Protection Association  
 CZ - TEST - Czech association of consumers  
 DE - Verbraucherzentrale Bundesverband - vzbv  
 DE - Stiftung Warentest  
 DK - Forbrugerrådet - FR  
 EE - ETL - Eesti Tarbijakaitse Liit  
 EL - Association for the Quality of Life - E.K.PI.ZO  
 EL - General Consumers' Federation of Greece - INKA  
 EL - Consumers' Protection Center - KEPKA  
 ES - Confederación de Consumidores y Usuarios - CECU  
 ES - Organización de Consumidores y Usuarios - OCU  
 FI - Suomen Kuluttajaliitto  
 FI - Kuluttajat-Konsumenterna ry  
 FI - Kuluttajavirasto  
 FR - UFC - Que Choisir  
 FR - Consommation, Logement et Cadre de Vie - CLCV  
 FR - Organisation Générale des Consommateurs - OR.GE.CO  
 HR - Croatian Union of the Consumer Protection Associations - Potrosac  
 HU - National Association for Consumer Protection in Hungary - OFE  
 IE - Consumers' Association of Ireland - CAI  
 IS - Neytendasamtökin - NS  
 IT - Altroconsumo  
 LU - Union Luxembourgeoise des Consommateurs - ULC  
 LV - Latvia Consumer Association - PIAA  
 MK - Consumers' Organisation of Macedonia - OPM  
 MT - Ghaqda tal-Konsumaturi - CA Malta  
 NL - Consumentenbond - CB  
 NO - Forbrukerrådet - FR  
 PL - Polish Consumer Federation National Council - Federacja Konsumentów  
 PL - Association of Polish Consumers - Stowarzyszenie Konsumentów Polskich  
 PT - Associação Portuguesa para a Defesa do Consumidor - DECO  
 RO - Association for Consumers' Protection - APC-Romania  
 SE - The Swedish Consumers' Association - Sveriges Konsumenter  
 SI - Zveza Potrošnikov Slovenije - ZPS  
 SK - Association of Slovak Consumers- ZSS  
 UK - Which?  
 UK - Consumer Focus



The European Consumers' Organisation  
 Bureau Européen des Unions de Consommateurs  
 rue d'Arlon 80  
 B-1040 Brussels  
 Tel : +32 (0)2 743 15 90  
 Fax: +32 (0)2 740 28 02  
 consumers@beuc.eu  
 www.beuc.eu



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