



Memorandum for
the Italian Presidency

Consumer priorities
2014



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Italian Presidency of the European Union

BEUC Priorities

BEUC, The European Consumer Organisation, is the umbrella organisation for 40 independent consumer organisations in 31 European countries. It is our objective to represent and promote consumers' interests among EU decision makers in all consumer relevant areas which match our members' strategic priorities.

Our Italian member is Altroconsumo, who is also represented in BEUC's executive and has provided BEUC's president for many years. Our Italian affiliate is CIE (Consumatori Italiani per l'Europa).

In this memorandum for the Italian Presidency of the Council of Ministers, BEUC presents its consumer policy priorities and urges policymakers to strengthen efforts to focus on consumers' concerns and expectations when passing the listed legislative initiatives.

In particular, the memorandum draws the attention to the following issues:

- Data Protection: An update of EU's personal data protection rules should strengthen citizens' protection and control over their own data.
- Telecoms Single Market: The legal framework regulating telecoms services needs to be updated, creating a real Single Market for consumers without roaming costs and protecting their right to access the open Internet.
- Payment services: Enhance consumer rights and protection, as well as market competition.
- Official controls in the food sector: Improve controls to increase consumer trust in their food.
- Product safety and market surveillance: Consumers' exposure to unsafe products needs to be minimised and market surveillance improved.
- Package travel: The legal protection for holiday makers who book travel packages online needs to be modernised.
- Common European Sales Law: The need for this so-called 'optional' regime has not been proven. It will only make cross-border trade more costly and complicated for consumers and business alike.
- Transatlantic Trade and Investment Partnership (TTIP): The EU/US trade negotiations need to guarantee EU consumer safeguards as a precondition to result in potential benefits for consumers.

We hope that under the Italian Presidency progress will be made on these and all other initiatives mentioned in our Memorandum with the aim of delivering clear benefits to European consumers.

We wish Italy a most successful Presidency.



1 TTIP – Transatlantic Trade and Investment Partnership

Background

The idea of a Transatlantic Trade and Investment Partnership (TTIP) comes from a process of progressively enhanced inter-institutional dialogue between the EU and the US, which culminated in the final report of the High-Level Working Group on Jobs and Growth (HLWG) in early 2013. Following the recommendations contained in the report, in June 2013 the Council of the European Union has given the European Commission the mandate to formally start trade negotiations with the US.

The aim of TTIP is to boost growth and create new jobs, by removing tariff barriers and facilitating trade in goods and services as well as investment flows between the two sides of the Atlantic. As of June 2014, five negotiation rounds have taken place. Importantly, TTIP contains a new dimension which is to focus not only on reducing non-tariff barriers, but also to aim at more regulatory coherence between the EU and the US, thus to get rid of unnecessary differences in regulation.

In response to stakeholders' concerns about the transparency and accountability of this process, the Commission's Directorate-General for TRADE in January 2014 set up an Advisory Group composed of 14 industry and civil society representatives with the aim of seeking expert advice by the parties directly affected by the agreement. BEUC together with TACD (the Trans Atlantic Consumer Dialogue) represent consumers' interests in this group.

Despite the advantages that increased trade with the US market could obviously bring for European consumers , TTIP also risks posing threats on consumers due to the very different standards currently existing in EU and US regulations (for example on food, chemicals and the protection of personal data). The fact that the economic and growth goals depend to a large extent on achievements in reducing non-tariff barriers leads to believe that the potential benefits of this agreement could be offset by a lowering of current standards in several key consumer sectors.

We call on the Italian Presidency to ensure that negotiations are carried out in a more transparent way and that consumer, health, environmental, labour and safety standards are not lowered.

Our demands

- More openness and public accountability of the TTIP negotiations is necessary. The following should be made available for the public: the offers exchanged by the US and the EU; Any further papers submitted by the EU in the course of the negotiations that detail or explain the positions of the EU and that are being used in the course of the negotiations with the other party; The draft versions and final version of the agreement at all steps of preparation and evolution.
- An Investor-State Dispute Settlement (ISDS) mechanism should not be included in the agreement.
- The European Commission should aim at concluding a deal which ensures the protection of consumer, environmental, labor, health and safety standards and to refuse compromises which will lead to lowering of such standards or creating obstacles to improve them in the future. We ask EU member states and the European Parliament to closely monitor the progress of the negotiations in order to timely raise an objection to any provision in the agreement that would lead to lowering EU standards.

Documents

- BEUC position paper on TTIP ([X/2014/031](#))
- BEUC position paper on Food & TTIP ([X/2014/030](#))
- Factsheet on TTIP ([X/2014/032](#))



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Consumer rights & Enforcement



1

Package travel Directive

Background

Since the 1990s, the dramatic increase in internet sales, the advent of online travel agencies and the evolution of consumer expectations and preferences have fundamentally changed the travel market. Many new travel services and products currently offered to consumers fall outside the scope of the existing Directive and leave them unprotected.

Moreover, consumers do not distinguish between the 'classic' packages and the new products available on the market.

In July 2013, the European Commission adopted a proposal for a review of the Directive. The new proposal provides a few improvements, but also shows some important gaps and flaws which need to be remedied in the legislative process. The scope does not provide a high level of protection, particularly with regard to online purchases.

Furthermore, the principle of full harmonisation will have a negative impact on certain national laws which provide a higher level of protection than the proposal.

Unfortunately, the European Parliament's first reading opinion adopted in March 2014 does not improve the Commission proposal, but represents a retrograde step in the scope of the Directive.

We deplore that the definition of online “click-through” packages was weakened and the borderline between “packages” and “linked travel arrangements” has been blurred. This will introduce an element of legal uncertainty likely to cause consumer detriment when deciding which level of protection applies to a given case.

We urge the Italian Presidency to aim to truly improve the proposed Directive for European consumers. It requires a wide scope of application of protections and a mixed harmonisation approach, rather than full harmonisation.

Our demands

- BEUC supports a definition of ‘package travel’ which covers new selling methods such as tailor-made packages, ‘dynamic’ packages (where consumers individually compile their own travel arrangements) and online ‘click-through’ combinations of travel services. The definition of ‘package’ should include online purchases made through linked booking processes where booking data is transferred between different service providers, not only when the name or the credit card details are transferred.
- A mixed harmonisation approach to the new Directive (combining minimum and full harmonisation rules, rather than only full harmonisation) should be introduced while assessing its impact on current national laws.
- Packages and “linked travel arrangements” covering a period of less than 24 hours as well as occasionally organised travels, should be included in the Directive, not excluded as proposed.
- The definition of “linked travel arrangements” (LTAs) should include protection against the insolvency of any relevant service provider.
- Traders selling “linked travel arrangements” and standalone services should be obliged to provide the consumer with relevant information about the service sold, confirm the bookings and be liable for any errors occurring in the booking process.
- Both the organiser and the retailer should be jointly liable vis-à-vis the consumer for the performance of the ‘package’ contract (joint liability).
- No price increases should be allowed after the conclusion of the contract. Alternatively, the possibility to increase prices after the conclusion of the contract should be subject to a clear cap of 3% of the price paid (beyond which the contract would be null and void) and on notice no later than 40 days before the date of departure. No price in-

creases should be allowed for late bookings (within 4 months of departure); the consumer should not be required to pay any fee to benefit from eventual price reductions.

- Should the contract conditions be altered by the organiser, acceptance or refusal by the consumer should be explicit (not tacit). Significant contractual changes should only be possible when they do not cause significant inconvenience to the consumer and should be fair and reasonable.
- The consumer should have the right to cancel the contract without paying compensation for reasons of force majeure in the traveller's private sphere (e.g. illness, accident, death in the family).
- The right of the consumer to a price reduction for a lack of conformity should be based on the strict liability of the organiser (no-fault liability).
- The limitation on the obligation to provide care/assistance should be deleted.
- The right to compensation should not be excluded if the consumer does not immediately notify a lack of conformity.
- The limitation period on introducing claims in court should not be shorter than 3 years (Member States being able to provide or maintain longer periods in their laws).
- The consumer should have the right to withdraw from a distance selling contract within 48 hours after the booking. Where a contract is concluded off-premises, a 14 day right of withdrawal should be introduced as stipulated for package holidays in the doorstep-selling Directive (Directive 85/577/EEC). There is no valid reason for exempting travel services from the right of withdrawal granted to consumers in other distance and off-premises contracts.

Documents

- BEUC's position on the review of the Package Travel Directive ([X/2013/082](#))
- Public consultation on the Package Travel Directive – BEUC response ([X/2010/008](#))

2

Air passenger rights

Background

The existing air passenger rights regulation (Regulation 261/2004) has helped improve the status of passengers by granting basic rights. However, the enforcement of these rights has been toothless and incoherent. Problems remain widespread and consumer complaints about poor compliance have risen steadily.

Passengers are often left with the sole “alternative” of taking legal action against non-compliant airlines, but few are able to do so. The volume of cases before the Court of Justice of the European Union (CJEU) in recent years clearly shows the need to clarify fundamental aspects of the regulation and ensure passengers can enforce their rights more easily. However, existing rights should not be weakened and the rulings of the CJEU should be codified in EU law.

Against this background, BEUC gave a mixed welcome to the European Commission’s proposal for the review of Regulation 261/04 on air passenger rights regretting the proposed weakening of some existing rights (mainly compensation and accommodation in “extraordinary circumstances”).

The European Parliament’s first reading opinion adopted in February 2014 significantly improved the Commission’s proposal on nearly all the issues at stake. The main achievements are the prohibition of “no-show clauses” on all return flights and the exclusion of most “technical problems” from the scope of “extraordinary circumstances”, as well as more re-routing opportunities e.g. after a delay and a subsequent missed connection.

The Commission proposal was also improved on the right to accommodation and the right to compensation for long delays.

We urge the Presidency to work to ensure the best outcome can be secured for European consumers, by drawing on the progress made by the European Parliament.

Our demands

- Airlines should compensate passengers after 3 hours of delayed arrival (Sturgeon case CJEU ruling).
- The right to compensation should not be dependent on the passenger's request, nor be excluded should the passenger be informed of a delay or cancellation in advance.
- Most "technical problems" should not be considered "extraordinary circumstances".
- The general right to accommodation in extraordinary circumstances needs to be maintained or only reduced following the European Parliament's first reading opinion (5 days of accommodation).
- The new Regulation should include an outright ban on airlines denying the boarding of a connecting or return flight where a passenger has not taken or has missed the outbound leg (i.e. prohibit 'no-show clauses').
- Re-routing should be granted as soon as possible and involve alternative means of transport (the 12 hour timescale should be deleted). The right to re-routing should also be granted to passengers who suffer a long delay.
- The right of passengers to file complaints with airlines should not be time limited.
- Mandatory guarantees against airline insolvencies covering the reimbursement and repatriation of passengers should be introduced, as was demanded by a European Parliament resolution.
- Passengers should have the right to transfer their tickets to another person should they not travel (as for package travellers).
- The advertised prices of air tickets should include the following minimum services: check-in, provision of a boarding pass and 1 item of checked luggage.
- Aside from one item of hand luggage, passengers should have the right to carry their essential items and any airport retail purchases.
- Airlines should be obliged to adhere to Alternative Dispute Resolution systems (ADR).

Documents

- Air Passengers Rights – Revision of Regulation 261/04 – BEUC Presentation by at the hearing of the European Parliament's Transport Committee ([X/2013/038](#))
- Revision of Regulation 261/04 on the rights of air passengers in the event of denied boarding, cancellation and long delays – BEUC's position paper ([X/2013/056](#))
- Public consultation on passenger protection in case of insolvency – BEUC response ([X/2011/048](#))
- Protection of air passengers in case of insolvency of airlines ([X/2011/105](#))

3

Common European Sales Law (CESL)

Background

A proposal for a Common European Sales Law regulation (CESL) introducing a '28th regime' of law, covering business to consumer (b2c) contracts was adopted by the European Commission in October 2011. It consists of a set of rules which co-exist alongside national law and which can be "chosen" by the parties as the legal basis for the contract.

It would set aside the consumer specific regime of Private International Law (the Rome I Regulation) and circumvent the application of the relevant national, mandatory consumer protection provisions.

BEUC is not in favour of the introduction of an 'optional' regime for consumer contracts. There is no need to deviate from the traditional means of regulating consumer contract law. This European contract law regime would rule out the application of national mandatory consumer rules and prompt lower standards of protection than those currently enjoyed in key consumer law areas in several countries.

It would also give the trader the choice as to what level of protection the consumer benefits from.

Importantly, it would be confusing for consumers and businesses to deal with different regimes of contract law (national and European), thereby rather than facilitating cross-border commerce, it would become more complicated and costly for consumers and businesses alike.

Because consumers are much better protected by solid legal rights enshrined in national law than by an 'optional' measure offered or withheld from them by the trader, BEUC is in favour of reviewing and further harmonising the few remaining consumer contract law elements relevant for the Single Market, i.e. the rules for legal guarantees and for digital content products, instead of pursuing an 'optional' approach.

In its first reading opinion, the European Parliament, suggested reduction of the scope of the Regulation by making it applicable to e-commerce contracts (more precisely to distance selling contracts) only. BEUC believes such a reduction in scope would not help make this optional instrument more acceptable. Rather it underlines its redundancy because of the 2011 Consumer Rights Directive which significantly increases harmonisation of the most important elements of consumer

contracts and online contracts in particular. The Consumer Rights Directive will become applicable just when the Italian Presidency will start.

It is against that background that we urge the Italian Presidency to examine the European Parliament's opinion suggesting the reduction of the scope of the instrument to online (distance selling) contract and to launch a discussion on the usefulness and necessity of such an instrument for business to consumer contracts.

Our demands

- European legislators should reconsider the need for this costly and time-consuming initiative and whether its objective of facilitating cross-border business for consumers cannot be met by much more effective, cheaper, swifter, less intrusive measures such as a European code of conduct for e-commerce transactions and the speedy implementation of the Consumer Rights Directive.
- The European Parliament's 'health check' of the Commission's Impact Assessment confirmed the Commission's methodology to be dubious and in the most essential parts the quality and credibility of the data is questionable. We hope the Council will consider its results too.
- The proposed CESL, which aims to override EU private international law, is incompatible with Article 6(2) of the Rome I Regulation which aims to guarantee the application of higher consumer protection standards. BEUC's analysis shows that the level of protection in the proposal's annex is not truly high. It does not match higher standards in numerous Member States on issues such as unfair contract terms or legal guarantees (e.g. the burden of proof or payment use).
- Digital content is an area in which the current situation is causing detriment to consumer rights, as clearly shown by two recent Commission studies. More legal certainty and modern consumer protections are needed at EU level. The CESL proposal includes modern rules in this field, but they will only be applicable if businesses deem them self-advantageous. Instead, BEUC calls for a non-optional legislative Directive to harmonise contract laws for digital products.

- Instead of optional law, the EU should continue the successful harmonisation process for consumer contract law elements which is useful for consumers and business, furthering the development of the Single Market. Instead of introducing a new era of optional regulatory EU tools inappropriate for consumer contracts, we call on the Commission to continue modernising consumer law by traditional methods – using full and minimum legislative harmonisation as appropriate – and completing the review of the consumer law acquis as originally envisaged.

Documents

- Factsheet on Common European Sales Law ([X/2013/080](#))
- Letter to the Legal Affairs Committee on their report ([X/2013/085](#))
- Contribution to European Parliament hearing, March 2013 ([X/2013/020](#))
- Letter to European Parliament on their Impact Assessment ‘health check’ ([X/2013/035](#))
- BEUC’s contribution to the Parliament’s Legal Affairs Committee workshop on unfair contract terms ([X/2012/055](#))
- The European Commission’s proposal for a Common European Sales Law – BEUC position ([X/2012/014](#))
- BEUC’s Joint letter with Ecommerce Europe to MEPs calling for the rejection of CESL ([X/2014/009](#))

Pan-European and cross-border enforcement of consumer rights

Background

Giving European consumers new or better rights is not worth much if those rights cannot be enforced properly. Enforcement is one of the major consumer policy priorities for the EU, as attested by the EU Consumer Programme and the European Commission's Consumer Agenda.

The European Commission is rightly seeking ways to improve enforcement throughout the EU. The review of the Consumer Protection Cooperation Regulation which creates a network of national enforcement authorities and gives them powers to investigate cross-border infringements will be an important future step within this new policy.

Due to national divergences in enforcement approaches, cooperation is not always easy and needs to be developed further. In addition, European consumers increasingly face infringements of a pan-European nature and tackling such Europe-wide unfair commercial practices via separate national strategies is no longer an adequate option.

BEUC calls for a shift in enforcement perspectives from cross-border infringements to genuine enforcement without borders in the EU. If the Single Market is to deliver for consumers, modes must be found to effectively tackle both cross-border and pan-European infringements and guarantee coherent results. In this respect, a discussion should be launched about the possibility of a centralised European procedure with an active investigative and enforcement role for the European Commission.

"Common enforcement positions", a recent addition to the 'toolbox' of the cooperation of the national enforcers, could be useful, but criteria should be established in order to identify the cases for which such positions are appropriate responses and what their legal impact will be. They could be a good basis for a co-ordinated European enforcement action, but they should not be used when stronger measures such as specific legislation would be required to tackle a problem.

Another way of making enforcement more efficient, the European Commission has announced an ‘enforcement dialogue’ with stakeholders, among them consumer organisations. We hope that under the Italian Presidency the strengthening of this enforcement dialogue will be the subject of further discussion amongst ministers and enforcement authorities and that consumer organisations will be duly involved in this important process. The Presidency conference on enforcement on 7-8 July should be seized as a good opportunity to discuss those issues.

Our demands

- Valuable, constructive relationship building and information sharing between consumer organisations and national enforcers is a prerequisite for developing a new European enforcement culture.
- The European Commission’s enforcement dialogue should not be just a unilateral flow of information from consumer organisations towards enforcers. A crucial aspect here is that in order to enable real dialogue and information sharing which identifies and tackles infringements most effectively, consumer organisations need to be considered a genuine partner on a national level and be involved in co-ordination work at EU level.
- In order to fight European infringements, a discussion on the European Commission’s powers in the enforcement of consumer rights should be launched.

Documents

- Letter to European Commissioner Neven Mimica on cross-border enforcement ([X/2013/084](#))
- Improving enforcement cooperation. BEUC response to the consultation on the review of Consumer Protection Cooperation (CPC) Regulation ([X/2014/005](#))
- Additional response to the consultation on the review of Consumer Protection Cooperation (CPC) Regulation ([X/2014/038](#))

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1 Revision of the Insurance Mediation Directive

Background

The existing Insurance Mediation Directive contains principles which each Member State implemented in different ways. Some important matters do not fall within its scope.

For example, insurance products sold directly by undertakings and on an ancillary basis are unregulated. Lower selling standards for life insurance products with investment elements (e.g. unit-linked contracts) as opposed to non-insurance investment products (which are regulated under the Markets in Financial Instruments Directive [MiFID]) leads to inconsistency across sectors because market operators offer insurance-based investments instead of alternatives.

In 2012, the Commission proposed a revision of the Insurance Mediation Directive (IMD2), the goal being to upgrade consumer protection in the insurance sector by common standards across insurance sales and ensuring appropriate advice. In February 2014, the European Parliament voted for the consumer-friendly elements of the European Commission's proposal.

We ask the Italian Presidency to table this proposal as a priority under their term.

Our demands

- BEUC welcomes the proposed revision of the Insurance Mediation Directive, as harmonisation of sales rules for all types of insurance (including life insurance) is necessary to avoid loopholes in consumer protection and regulatory arbitrage from the financial industry. Positive elements which are also supported by the European Parliament include restrictions on tying and bundling and close alignment with MiFID II. These should be retained.
- All intermediaries selling insurance, including small insurances on an ancillary basis such as covering mobile phone loss, broken glasses, lack of snow during skiing holidays, should fall under the Directive's scope and comply with all consumer protection provisions.
- Avoid conflicts of interest and in particular ban remuneration contingent upon any targets related to the activities run by the intermediary – including sales volume and the number of client claims.
- Not only should remuneration linked to a contract be disclosed, but all remuneration based on achieving agreed targets or thresholds linked to the mediation activity.

Documents

- BEUC position paper on Insurance Mediation Directive ([X/2012/026](#))
- Factsheet on “Small insurances” ([X/2014/041](#))

2

Payment Services Directive and Regulation on Interchange Fees for Card Payments

Background

Retail payment services are ubiquitous in consumers' daily lives. Consumers should be able to rely on a wide range of secure, efficient, cheap and convenient payment options for both face-to-face and remote transactions.

In July 2013, the European Commission adopted proposals for the review of the Payment Services Directive and the Regulation on interchange fees for card payments. The aim is to adapt the legislation to new market developments, foster competition by creating a level playing field for all payment service providers and improve consumer rights and protection.

The European Parliament's first reading opinion on the PSD revision and Interchange Fee Regulation adopted in April 2014 took onboard several amendments aimed at enhancing consumer rights and protections. To mention a few, consumers would be granted an unconditional refund right for direct debit transactions and the European Banking Authority would be mandated to issue guidelines to clarify the interpretation of gross negligence with respect to unauthorised payment transactions.

We call on the Italian Presidency to take the Parliament's position and our demands into account, focus on consumer protection aspects and more effective competition rules.

Our demands

- Ban surcharges at EU level: surcharging has proven harmful to consumers and inefficient in incentivising the use of cheaper payments means.
- Provide direct debit users with an unconditional refund right for authorised and unauthorised transactions.

- Enshrine in law the limitation of the consumer liability for unauthorised payments and clarify the interpretation of “gross negligence”.
- Ensure payment service providers (PSPs) refund the amount of the unauthorised transaction on the same day as it has been made aware of the transaction.
- Ensure consumers’ security credentials are inaccessible to third party payment providers.
- Ensure consumers are notified when there a breach puts their personal data and security features at risk (mandatory data breach notification obligation).
- Ensure PSPs regularly provide data on payment related fraud to competent authorities.
- Clarify that Member States can apply the provisions of the PSD in a flexible manner to services which are currently excluded from its scope.
- Provide host state supervisors with powers to take measures when a PSP from another country does not comply with its duties and responsibilities.
- Adopt the interchange fee caps proposed by the Commission (0.2% and 0.3% for debit and credit cards respectively), with an option for Member States to adopt lower caps to ensure the regulation does not harm cheap and efficient national card schemes.
- Prevent any attempts by PSPs to circumvent the rules established by the MIF Regulation, including non-EU issuance of payment cards.

Documents

- Factsheet on Multilateral Interchange Fees ([X/2013/025](#))
- BEUC response to the Commission Green Paper consultation ‘Towards an integrated European market for card, internet and mobile payments’ ([X/2012/022](#))
- BEUC position paper on the revision of the Payment Services Directive ([X/2013/079](#))
- BEUC position paper on proposed Regulation on interchange fees ([X/2013/077](#))



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1 Data protection regulation

Background

In January 2012, the European Commission adopted a proposal for a Regulation on Data Protection which will replace the current 1995 Directive. The proposal aims to ensure a uniform set of rules across Europe, while strengthening the rights of individuals and facilitating the flow of personal data across borders. We welcome the numerous positive elements of the proposed Regulation.

The European Parliament's leading Committee has already adopted its report almost unanimously, together with the mandate to start negotiations with the Council. The outcome of the vote is positive with MEPs strengthening key provisions of the proposal further.

In particular, the definition of personal data remains broad, while the new rules will apply to all companies offering services to EU consumers or monitoring their behaviour. The principles for processing, including transparency data minimisation and purpose limitation, have been strengthened, and the rights to data portability and erasure have been maintained. The European Parliament has also introduced strong safeguards with regards to transfer of data to third countries and has established multiple means for consumer redress.

BEUC calls upon the Italian Presidency to intensify the work on the proposed Regulation to ensure that the new rules are adopted in the current legislative term. The report of the European Parliament provides a good basis for an inter-institutional agreement to be reached. Europe can become the global leader by adopting strong and future-proof data protection rules.

The report of the European Parliament, adopted in March 2014 provides a firm basis for agreement between the legislators.

Our demands

- The definition of personal data should remain broad and flexible in light of the rapidity of ICT developments. Pseudonymised data is, by definition, personal data as it relates to an identifiable individual and therefore falls within the scope of the draft Regulation.
- The scope of “legitimate interests” as a ground for processing should not become a catch-all category. It can only be used as a last resort i.e. when no other legal grounds are available and the data controller should prove that its interests override those of the data subject.
- As regards the principle of purpose limitation, the European Data Protection Board should be entrusted with the task of defining criteria to assess the compatibility of further processing with the original purpose for which data was collected.
- When subject to profiling measures, consumers should be informed of the possible consequences or effects this could have on them. Consumers should also be able at all times to object to the processing of their personal data for profiling purposes. Furthermore, the legitimate interests of the controller cannot be accepted as a legal ground for profiling.
- A dual system of notification of data breaches needs to be maintained, according to which all breaches must be notified to the data protection authorities while only those breaches which adversely affect the protection of personal data and privacy should be notified to individuals.
- Judicial collective actions for compensation for harm suffered from data protection infringements should be introduced.

Documents

- BEUC position paper on Data Protection ([X/2012/039](#))
- EU Data protection day – Key messages ([X/2013/007](#))

Background

The European Commission's proposed Regulation to reform the EU's telecommunications legislation, issued in September 2013, is an ambitious initiative. It offers a good opportunity to remove barriers in this market by creating a truly single market for European consumers while updating and improving consumer protection in the sector.

However, it carries the risk of significantly impacting the degree and quality of competition across Europe, both in fixed and mobile markets. Therefore it is crucial that the proposed measures are carefully analysed as regards their impact on consumers. The European Parliament has adopted a first reading opinion that BEUC finds quite balanced overall and, equally importantly, is ambitious on important issues such as protecting internet neutrality and the abolition of roaming.

We call on the Italian Presidency and all Member States to follow the European Parliament's approach on both issues.

Our demands

- A Single Market of telecoms for consumers means that cross-border services inside the EU, such as international long distance calls and roaming, should be offered at the level of domestic prices. The phasing out of roaming charges can be gradual but it should happen at a faster pace than projected and must be applicable to all European mobile consumers. Any limitations on the general principle must be carefully analysed. Wholesale roaming fees must also be abolished or significantly reduced to avoid an undesired impact on competition.
- A thorough analysis of the impact of the proposed measures on domestic retail markets must be carried out, since companies will naturally tend to increase domestic retail prices to balance off the decrease in revenue. Measures to avoid or reduce the impact of this increase must be included.

- The provisions on end-user rights, such as termination of contracts, notice periods or compensation for subsidised equipment, for example must be significantly improved. Arbitrary penalty fees, permitted by the 2009 Directive, act as a lock-in mechanism and disincentive to switching and should be eliminated from the market. An update of the Universal Services Directive is preferable to a Regulation in order to respect national specificities and allow Member States to have more flexibility to respond to new abuses which may arise in future.
- The Articles which guarantee access to an open and neutral internet must be significantly improved in the European Commission's proposal. The prohibition on discrimination between internet traffic must apply to all traffic, not just parts of it. The definition of "specialised services" must be made clearer to ensure internet content is not separated and sold at a premium rate. The provisions which aim to shield a 'best-efforts' internet market from unwarranted access from specialised services need to be strengthened. The text adopted in the European Parliament should be used as a basis for discussion and be complemented with further provisions on issues related to positive discriminations and zero-rating of specific internet content.
- Further analysis is needed on how the proposed Regulation affects investments in broadband infrastructure and how it can be ensured that sufficient broadband investments are dedicated to internet access services.

Documents

- Telecoms Single Market – Achieving a Connected Continent ([X/2013/081](#))
- Joint statement in defence of Net Neutrality amendments ([X/2014/016](#))
- BEUC Key Issues paper ([X/2014/020](#))



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1 Official controls in the food sector

Background

On May 2013 the European Commission published a package of measures to strengthen the enforcement of health and safety standards for the whole agri-food chain. This package included the proposal on official food controls. While the proposal aims to reduce the administrative burdens on industry by abolishing information obligations, it also calls for a more risk-based approach to controls across the chain.

It is clear that, in recent times, consumer confidence in food and the food chain has, once again, been seriously dented. The horsemeat scandal demonstrated just how long and complex the food chain has become and, while this time it was not a food safety issue, highlighted just how costly this can be for consumers, the food industry and Member States. The current review provides an opportunity to take steps to prevent such a scandal from occurring again.

An important issue up for discussion is the financing of official controls. While up to now, only certain parts of the chain were subjected to fees, the intention is to require all food operators to pay, with the exception of micro-enterprises. BEUC supports the proposal, however, it must be ensured that the costs are not passed on to the consumer.

In addition, we do question the exemption of micro-enterprises to fees. It is essential that the risk posed by businesses is taken into account as small businesses can be high risk.

The European Parliament plenary adopted its first reading opinion on the proposal in April 2014.

We ask the Italian presidency to do its utmost to find an agreement which takes consumers' concerns fully into account and ensures the speedy advance and adoption of the proposal.

Our demands

- Ensure the impartiality, quality and consistency of controls and the independence of the authorities in charge of them.
- More unannounced independent inspections looking at food authenticity (e.g. checking if veal is veal and not horse meat) in addition to food safety.
- Tough penalties for those prosecuted.
- Food industry should also improve traceability and regularly test its products.
- Greater transparency to the public on how food businesses are performing by publication of inspection reports (e.g. on the internet) and adoption by more Member States of schemes as “scores on the door” or smileys.
- Improved co-operation and co-ordination both between Member States themselves and between Member States and the Commission.

Documents

- BEUC position paper on the Official Controls review ([X/2013/050](#))

Food Information: Country of Origin Labelling

Background

Recent years have seen a growing interest among European consumers in knowing the origin of the food they buy. In response, some industry operators have recognised the marketing potential this provides and communicate the origin of their products. Indications such as ‘made in’, ‘product of’, etc. are multiplying on food labels as well as the use of flags, symbols or pictures which can indirectly imply or suggest a particular food’s origin (though sometimes in a confusing way). While the origin must always be labelled for some foods – olive oil, fish (unless it is canned or prepared), beef (fresh, chilled, frozen or minced), fresh or frozen poultry of non-EU origin, wine, most fresh fruit and vegetables, honey and eggs – for all other foods origin labelling is only voluntary.

This means that currently origin information is largely missing on foods such as meat products (e.g. ham and sausages), yoghurts and cheese, kitchen staples (e.g. oil, flour, sugar and pasta), biscuits and confectionery or ready-meals. BEUC research shows that consumers want to know the countries where the animal was born, reared and slaughtered and where the meat was further processed into e.g. sausages or ready-meals. As of December 2014, origin labelling will become compulsory on fresh, frozen and chilled pig, poultry, sheep and goat meat. However, only the country of rearing and slaughter of the animal will have to be indicated, not the country of birth. BEUC deplores the fact that the beef labelling model, which requires indication of the three stages, was not transposed to other types of fresh meat. We even see the risk that, for the sake of “consistency”, the beef labelling rules might be amended to remove the obligation to declare the country of birth. We would strongly oppose any move in that direction. The long-awaited European Commission report on mandatory origin labelling of meat used as an ingredient was published in December 2013, but concrete legislative proposals are now needed to make progress on this important issue for consumers.

Following the exchange of views of EU agriculture ministers in the European Commission’s report in March 2014, we urge the Italian Presidency to keep this issue high on the Council’s agenda in a bid to put pressure on the European Commission to come forward with legislative proposals. Reports looking at the feasibility of extending mandatory origin labelling to milk, milk used in dairy and single ingredient foods are also to be produced by the end of 2014.

Finally, when it comes to voluntarily declarations of origin by food manufacturers, new rules will ensure consumers are informed about whether a food’s primary ingredient(s) have a different origin to that stated on the packaging. However,

the exact modalities for these rules remain to be decided upon. It is important that consumers' perception of what constitutes the 'origin' of an ingredient (place of farming or country of last substantial processing) is fully taken into account when designing those rules.

Following the horsemeat scandals, we call on the Italian Presidency to do its utmost to ensure that consumer demands for information on the origin of meat food ingredients are not ignored, namely to ensure compulsory labelling of the animal's country of birth, rearing and slaughter and of the country where the meat was further processed into e.g. sausages or ready meals.

Our demands

- Consumers want to know the full journey of their meat from the farm to their plate. We want rules for origin labelling on fresh meat of pig, poultry, sheep and goat to be revised to include the country of birth, as is also supported by the European Parliament. Should consumers' demands be ignored, we at least seek reassurance that beef origin labelling rules will remain untouched.
- We want origin labelling to become compulsory for meat used as an ingredient. We urge the Italian Presidency to call on the European Commission to make concrete proposals in that sense.
- Origin labelling should also become mandatory for milk (including when used as an ingredient in dairy), unprocessed foods (e.g. pre-cut fruit and vegetables), single-ingredient foods (e.g. flour, sugar, oil) and ingredients that represent more than 50% of a food more than 50% of a food.
- The origin of a food's primary ingredients should be defined as the place of farming of the raw materials (e.g. wheat for flour used in a cake; sugar beets/canes for sugar used in chocolate; milk for cheese or pig for ham used on a pizza). It should be given at least at the same level of precision as for the food itself.

Documents

- 'Where does my food come from?' – BEUC consumer survey on origin labelling of food ([X/2013/006](#))
- Factsheet on Origin labelling on food – BEUC factsheet ([X/2013/005](#))

3

Cloning

Background

In December 2013, the European Commission published two proposals dealing respectively with the use of cloning techniques for food production purposes and placing food from cloned animals on the market. Whilst they prohibited the cloning of animals for food supply in the EU, the proposals do not address the critical issue of food from the offspring of cloned animals, though the latter is the most likely to end up on consumers' plates.

An overwhelming majority of European consumers do not want cloning to be used for food production. If food from cloned animals, their offspring or descendants were to end up on supermarkets' shelves, they have clearly said they want it to be labelled so they can make an informed choice.

Our demands

- Consumers should be able to decide for themselves whether or not to eat food derived from cloned animals, their offspring or descendants.
- A full, compulsory traceability system of clones, their offspring and descendants should be established as well as labelling rules for food derived therefrom.
- As long as such traceability system is not in place, there should be a ban on the use of the cloning technique for food purposes as well as on the import of live clones (incl. embryos) for breeding purposes, clones' reproductive material, live offspring and descendants from cloned animals and food from such animals.
- Ongoing trade negotiations should not be an obstacle to adopting EU legislation on cloning that meets consumers' demand for transparency on how their food is produced.

Documents

- BEUC comments on the European Commission report on cloning for food production ([X/2010/087](#))

4

Review of the Food Hygiene Package

Background

The European Commission is currently reviewing the EU's hygiene laws on meat inspection, mechanically separated meat (MSM), good food safety practices and cold stores etc.

Following the impact assessment carried out on the current hygiene package, the Commission is expected to publish proposals for the review in mid-2014. While it has been determined that no fundamental overhaul is required, a number of improvements have been suggested.

From a consumer perspective, the most pertinent points relate to meat inspection, mechanically separated meat and the application of specific hygiene rules at the retail level.

We call on the Italian presidency to take consumers' concerns into account when the EC hygiene proposals are being discussed within the Council.

Our demands

- Consumer perception of mechanically separated meat is further examined and taken into account in any future proposals in this area especially regarding the definitions and labelling of such products.
- Meat inspection is a very sensitive issue amongst consumers and any proposal to delegate certain tasks to slaughterhouse staff could severely undermine consumer confidence in meat safety (as controls would be perceived as less independent and transparent). Any proposal on delegating certain tasks should only be made once the Commission is in a position to specify the exact tasks concerned. Also, following the horsemeat scandals, there is a clear need for more unannounced inspections at abattoirs and meat processing plants. This would go some way to regaining consumer trust in this sector.
- In the interest of consumer safety and consistency, the specific hygiene requirements of Regulation 853/2004 should be applied at the retail level as it is increasingly common for retail to cut, slice and re-wrap meat that is then sold at a 'self-service' counter.

Documents

- BEUC response to the Commission questionnaire on the Revision of Meat Inspection ([X/2011/088](#))
- BEUC comments on the review of the Hygiene Package ([X/2012/036](#))

 For more information: food@beuc.eu



1 Revision of the General Product Safety Directive

Background

Unsafe consumer products, including products bearing CE marking, are often found on the EU market requiring recall. They pose an avoidable risk to health and safety.

An update of the 2004 General Product Safety Directive is currently under revision by two new regulations on Consumer Product Safety (CPSR) and Market Surveillance (MSR).

This package contains important innovations suitable to enhance product safety in the internal market, such as rules on better traceability of products throughout the supply chain.

The European Parliament adopted its first reading opinion on the package of both proposals in April 2014, which included several positive elements such as the setting up of an EU-wide incident and injury database, stronger sanctions and penalties against liable traders and producers as well as strengthening the precautionary principle which ensures withdrawing potentially unsafe products from the market based on a justified assumption that a product is dangerous. The European Parliament maintained the controversial obligation for a mandatory country of origin labelling.

In the Council of Ministers, negotiations are at a stalemate due to Member States' diverging opinions on country of origin labelling, which is not a priority for consumers at all and should be taken out of the proposal if this would allow that the overall package could be completed.

Therefore, the Italian presidency has a crucial role to play in unblocking the impasse. We urge the Presidency to try to achieve the best protection for European consumers.

Our demands

- BEUC calls for the precautionary principle to be made a cornerstone of both the regulations on consumer product safety and market surveillance. Policy makers need to be able to act to prevent dangers even in the absence of absolute scientific proof. We insist that in terms of risk management, the final decision on an “acceptable” level of risk must remain a political responsibility. This principle should be clearly re-introduced in the Regulation.
- The adoption should not be delayed because of controversies among Member States on mandatory ‘country of origin’ labelling as it will be pivotal for the Council to focus on the most effective traceability instruments such as indicating a batch, type or serial number; indicating the full address of the manufacturer and importer on the product or packaging; implementing the ‘one up one down principle’ as exists with food and empowering the Commission to adopt additional traceability requirements in certain justified cases.
- Equipment on which consumers ride or travel e.g. amusement park rides should be included in the scope of the CPSR.
- Product-specific legislation which addresses environmental issues such as the EU Ecolabel Regulation, the EU Ecodesign Directive and the EU Energy Label Directive should be included in the scope of the MSR.
- Business secrets cannot prevail over the need to inform consumers without delay of serious risk. Market surveillance authorities need to adequately warn consumers without delay and publish all relevant information needed to identify a product and the risk involved.
- Penalties need to be proportionate to the infringement, not the size of the company.
- An EU-funded accident statistics system and a European complaint handling/reporting point should be established.
- Products with child-appealing characteristics must be safe for children to use or come in contact with, under all conditions of use.

Documents

- BEUC/ANEC position paper – Market surveillance of products ([X/2013/033](#))
- BEUC/ANEC position paper – Consumer Product Safety Regulation ([X/2013/034](#))

2

Chemicals which disturb the hormonal system

Background

Every day we come in close contact with an enormous range of man-made chemicals. We use skin creams with parabens, computers with brominated flame retardants and plastic kitchen tools with Bisphenol A (BPA).

Many of these chemicals are found in consumer products and are known to disturb the hormonal system, in particular when exposure takes place during crucial stages of development such as the pre-natal phase.

Endocrine disrupters (EDCs) are associated with common diseases such as obesity, diabetes, cardiovascular diseases, cancer and infertility.

Exposure to multiple chemicals in everyday life is of particular concern, as the EU regulatory framework largely neglects this 'chemical cocktail effect' and assesses safety on a chemical-by-chemical approach.

The issue has been recognised at EU level. In spring of 2012, the Environment Council called for hormone disrupting chemicals to be made a priority in the 7th Environment Action Programme, which is also supported by the European Parliament.

In May 2012, the Commission published a Communication on the combination effects of chemicals. The European Parliament adopted an own initiative report on protecting public health from endocrine disrupters in March 2013, yet the Commission's ongoing review process of its EU strategy on endocrine disrupters has still not been finalised.

We call on the Italian Presidency to ensure that as soon as the Strategy is published an in-depth discussion, taking into account the European Parliament report, will take place as to how consumers can effectively be protected from hazardous endocrine disrupters.

Our demands

- Exposure to endocrine disrupting chemicals should be reduced. To this end, chemicals with endocrine disrupting properties must be restricted and phased out. Safe alternatives must be used where they exist.
- A scientifically-based definition for ‘endocrine disruptor’ which is coherent and applicable to all existing and future EU legislation is needed.
- Under REACH, the role of authorities is to evaluate registered substances and propose appropriate risk management measures. When screening the registrants’ chemical safety assessments, authorities should not only consider the information of the REACH dossier, but also take into account other available information to assess if the substance is (potentially) endocrine disrupting.
- EDCs which have been identified as Substances of Very High Concern (SVHCs) should be included in Annex XIV of the REACH regulation. Consequently these substances would need authorisation.
- As part of the EU strategy on endocrine disruptors, the European Commission identified a priority list of substances for further evaluating their role in endocrine disruption. However, this list was established several years ago and should be updated taking into account REACH registration dossiers and newly available data.
- Risk assessment and risk management methods have to be updated to take into account low-dosage effects of EDCs as well as the combined effect of different chemicals.
- More EU-funded research is needed to better understand the complexity of the endocrine system and the effects of endocrine disrupting chemicals on human health and the environment.

Documents

- ‘Top 10 Actions MEPs can undertake to lower the exposure of consumers and of the environment to Endocrine Disrupting Chemicals’ ([X/2011/040](#))
- Factsheet on Endocrine Disrupting Chemicals ([X/2011/039](#))
- BPA Should be Phased Out from Consumer Products – BEUC position paper ([X/2011/038](#))

 For more information: safety@beuc.eu / environment@beuc.eu



1 Internal energy market

Background

Energy is one of consumers' main concerns in every European country and consumer trust in the energy industry is at an historic low. To accomplish an internal energy market by 2014, as requested by the Heads of State of Government in 2011, the complete transposition of the Third Energy Package is a fundamental step.

That is why both the European Commission and the Council of the European Union need to keep national energy retail markets under close supervision and act promptly where needed.

Although the state of liberalisation widely differs among Member States, a general trend can be observed across Europe and that is markets are still largely, and unacceptably, imbalanced.

In many countries, energy consumers still have a very limited choice of suppliers. By and large, European consumers lack the appropriate tools to examine the market and gain access to affordable and reliable energy suppliers. Moreover, our member associations consistently report that consumers often experience difficulties in effectively exercising their energy rights. The basic characteristics of a well-functioning retail market – comparability, ease of switching and complaint handling – are still to be achieved. Therefore, when discussing the completion of the internal energy market as well as the European Commission's Retail Market Initiative, we hope the Italian Presidency will ensure in-depth discussions on existing gaps and challenges, the development of energy prices for households as well as the state of competition in the energy sector.

At the same time, we call on the Italian Presidency to encourage European policy makers to put forward concrete actions so that consumers can enjoy truly competitive energy market.

Our demands

- Member States should urgently transpose the Third Energy Package.
- National markets need strong and proactive national regulators sufficiently empowered to monitor billing, switching and consumer complaints.
- Energy companies need to move away from the monopolistic mentalities of the past and realise that in a competitive market they need to gain and retain consumers by providing more affordable and reliable services which extend value for money. In this respect, consumer rights need to be strengthened and guaranteed.
- Consumers need to be able to make well-informed choices between the products and services offered by various energy suppliers. There must be sufficient choice without overburdening them with a wide variety of incomparable tariffs. Furthermore, switching needs to be facilitated and independent consumer advice be available so they can decide what is best for them.
- Energy services need to be affordable and reliable. The circumstances and conditions which lead to vulnerability in the energy sector need to be better understood.
- Consumers need to be given the choice of whether or not they participate in new programmes and schemes, for example smart metering or demand response.

Documents

- 'Making the Internal Energy Market Work' – A BEUC reality check on the European Commission Communication ([X/2013/016](#))
- BEUC and CEER Joint Vision for Europe's Energy Customers ([X/2012/106](#))
- BEUC response to CEER's discussion paper on a 2020 Vision for Europe's Energy Customers ([X/2012/057](#))
- BEUC presentation on Energy Retail Markets – A Snapshot From a Consumer Perspective ([X/2012/079](#))
- BEUC position paper on consumer rights in the energy sector ([X/2013/083](#))

Energy efficiency and future policies

Background

With the continuous increase in energy prices, European consumers are seeking more and more energy efficient solutions for their households. Improving energy efficiency is one of the most cost-effective ways of tackling high energy prices and climate change.

We believe the overarching goal of energy efficiency measures should be the overall reduction of energy consumption in Europe. Therefore, we support the implementation of a European target on absolute energy savings. However, with a view to achieving these targets, we believe it crucial that the absolute European targets translate in absolute national and absolute sectorial targets.

To get consumers onboard, measures on energy efficiency must be set at the most cost-effective levels resulting in the smallest pay-back periods possible. Information concerning energy efficiency should be transparent, in order to gain consumer trust and motivation to invest in more efficient technologies. At the same time, EU legislators should focus not only on the benefits energy efficiency can bring to consumers, but also clearly communicate about the costs. Transparency of the cost-effectiveness of the investments when making our homes more energy efficient as well as the impact on fuel poverty is crucial.

The EU is in the driving seat to shape national energy policies. Therefore, when discussing future policies (such as the 2030 Framework for Climate and Energy Policies), we believe it essential that the Italian Presidency emphasises on the most long-term and cost-effective solutions, while including the principle of affordability and avoiding discrimination against vulnerable consumers.

Our demands

- The overarching goal of energy efficiency measures should be the overall reduction of energy consumption in Europe.
- Future policies need to include the principle of affordability and avoid discrimination against vulnerable consumers, particularly those on a low-income.
- Distributional impact assessments of EU and national policies distinguishing between various consumer groups are needed to tailor different initiatives.
- Investments in energy efficiency solutions should be made in a cost-effective way and schemes be transparent and properly audited so that energy savings are indeed delivered to consumers.
- Greater transparency and efficiency is required to manage the costs and the risks to consumers of investment in the development of innovative new technologies and networks.
- New mobility solutions must be further developed and the EU needs to set ambitious binding CO2 emissions targets for cars.
- The car labelling Directive must be revised in order to provide consumers with better information at the point of sale and in advertisements.
- Ecodesign should cover more products and go beyond energy aspects.

Documents

- ANEC/BEUC reply to Public Consultation on the review of progress towards the 2020 energy efficiency objective and a 2030 energy efficiency policy framework ([X/2014/028](#))
- BEUC and CEER Joint Vision for Europe's Energy Customers ([X/2012/106](#))
- BEUC response to CEER's discussion paper on a 2020 Vision for Europe's Energy Customers ([X/2012/057](#))
- BEUC position paper on the Energy Efficiency Directive ([X/2011/115](#))

 For more information: energy@beuc.eu



1 Medical devices

Background

Medical devices – from contact lenses to pacemakers to pregnancy test kits – are features of many consumers’ daily lives and this broad range of products contribute significantly to people’s health and wellbeing.

In September 2012, the European Commission presented its proposals revising the EU’s legislation on medical devices with the aim of simplifying and strengthening the existing rules to the benefit of consumers and healthcare professionals. The package includes regulations on medical devices and in vitro diagnostic devices, as well as a Commission Communication on safe, effective and innovative medical devices.

The amendments voted by the European Parliament in its plenary session in April 2014 introduced significant improvements to the Commission proposals especially regarding consumer information, post-market surveillance, ethics and transparency.

The proposal is now in the hands of the Council and we hope the Italian Presidency will do its utmost to contribute to strengthening the requirements for pre-market assessment and ensure that the improvements adopted by the European Parliament will be accepted.

Our demands

- The initial European Commission proposal fell short in terms of pre-market assessment requirements. We ask for more thorough pre-market assessment for high risk devices and more clarity on borderline products (e.g. food supplements, medicines, herbal preparations).
- All medical devices on the market must have a positive risk/benefit ratio and bring therapeutic benefit to patients.
- The definition of “performance” should be adapted to include assessment of clinical effectiveness.
- Manufacturers should be required to produce more and better clinical data and conduct randomised controlled trials whenever possible to demonstrate a medical device is safe and effective before being placed on the market.
- A centralised pre-market assessment for a limited number of high-risk devices done by a new medical devices committee within EMA.
- Improve the functioning of the notified bodies promoting specialisation and excellence.
- Apply a consistent, risk-based approach for the classification of all devices.
- Set up a multidisciplinary expert group with binding power for a consistent classification of borderline products across the EU.
- Provide consumers with high quality, complete, understandable and user-tested information for all devices.
- Guarantee the meaningful involvement of consumers in market surveillance.
- Provide competent authorities with adequate resources to ensure proper enforcement.

Documents

- BEUC updated position on medical devices ([X/2013/031](#))
- BEUC position on the revision of the EU legislation on medical devices ([X/2012/058](#))



For more information: health@beuc.eu



The Consumer Voice in Europe

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



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The Consumer Voice in Europe

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