



Swedish Presidency of the European Union

BEUC priorities
2023



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Introduction

The European Consumer Organisation (BEUC) is the umbrella organisation for 46 independent consumer organisations in 32 European countries. Our mission is to represent and promote consumers' interests to EU decision makers in all consumer-relevant areas that match our members' strategic priorities.

Our Swedish member organisation is Sveriges Konsumenter.

Besides ongoing work on the Green Deal, **the Swedish Presidency will have an important role dealing with the impact of the Ukraine war on energy and food prices.** In this crisis, our members - consumer organisations from across the EU - are working actively to shield consumers from skyrocketing prices. At EU level, we are urging policymakers to provide the support consumers need, especially the most vulnerable ones.

The Swedish Presidency has several files on its agenda that will fundamentally shape the future for Europeans, particularly when it comes to energy, financial and digital markets. These priorities must be dealt with in a way that improves everyone's lives.

Numerous other legislative and non-legislative files of relevance to consumers will also be on the Presidency's agenda. In this Memorandum we outline concrete proposals for how the Council of Ministers, together with the European Parliament, should legislate to achieve a high level of consumer protection and empowerment.

We would like to draw your particular attention to the following initiatives:

- **The ‘Empowering consumers for the green transition’ and ‘Substantiation of green claims’ initiatives:** Together, both proposals for legislation should ensure that green claims and labels are robust and trustworthy. The ‘Empowering’ proposal is a step in the right direction but still requires some improvements. The upcoming green claims proposal must require companies to use standardised methodologies to substantiate their environmental claims.
- **The Ecodesign for Sustainable Products Regulation:** The proposal to revise and broaden the scope of the existing Ecodesign Directive needs to make sustainable and durable products the norm by setting stronger requirements at the design stage. Stronger measures are needed in terms of market surveillance and responsibilities of online marketplaces.
- **Directives on energy efficiency, renewable energy, electricity, gas, buildings performance:** The revision of several key pieces of legislation under the ‘Fit for 55’ legislative package must strongly enhance the ability of consumers to switch to more sustainable heating and cooling systems.
- **Transport initiatives (Alternative Fuel Infrastructure Regulation (AFIR), Better protection for passengers and their rights, Multimodal Digital Mobility Services):** The proposal to revise EU charging infrastructure legislation (AFIR) must ensure that recharging an electric car will be as easy as possible for consumers, notably regarding price transparency and payment methods. The Commission is expected to propose a package of proposals on public and long-distance transport which must make multimodal travel safer and more convenient for consumers, with easier booking/ticketing and stronger protection regarding service disruptions for instance.
- **The Consumer Enforcement Package:** The EU framework for Alternative Dispute Resolution (ADR) for consumers must be improved as there is evidence that ADR has failed to fully take off in Europe and the rules need to take account of recent technological developments. In parallel, the Consumer Protection Cooperation network and the coordination of national enforcement authorities must be strengthened to address cross-border infringements of consumer protection rules.
- **The Product Liability and the AI liability Directives:** A modernisation and further harmonisation of the EU’s civil liability rules to be better suited for the digital era is urgently needed. These proposals must ensure that consumers suffering harm from a defective product and/or AI system have access to justice and redress in practice.
- **The Artificial Intelligence Act:** Consumers should benefit from artificial intelligence rather than be exposed to new risks. The proposed Regulation must be improved to protect consumers from economic harm and discrimination caused by commercial uses of AI. Consumers must have a strong set of rights and access to effective remedies and redress mechanisms in case of harm, including collective redress.
- **The Cyber Resilience Act:** This important new proposal for legislation must ensure that connected products and associated services are cybersecure by design and by default.
- **The European Health Data Space:** Consumers must be in full control of their health data. The proposal for a Regulation must ensure that health data is strongly protected while enabling its use for healthcare services and health research in the public interest.

- **The Retail Investment Strategy and legislative reform:** The European Commission will propose during the Swedish Presidency a legislative package to better protect retail investors and increase their participation in financial markets. The EU should ban the payment of financial inducements to financial advisers to avoid conflicts of interest and so ensure consumers get appropriate and unbiased advice and can choose the financial products best suited for them.
- **The Distance Marketing of Financial Services Directive (DMFSD):** It is fundamentally important to update EU rules on the distance marketing of financial services so as to take into account new practices used to target consumers with financial products such as Buy-Now-Pay-Later credit. This is particularly important to protect consumers regarding new forms of online marketing e.g. via social media and the purchase of financial products without human interaction.

We urge you to facilitate progress on these and other initiatives mentioned in this Memorandum, with the aim of delivering clear benefits to European consumers.

We wish Sweden a most successful Presidency.

Monique Goyens
Director General

Arnold Koopmans
President



SUSTAINABILITY

1

Ecodesign for Sustainable Products Regulation

Why it matters to consumers

Consumers want to buy more sustainable, durable and repairable products since this is better both for the environment and their pockets. Unfortunately, this is difficult today as the sustainable option is generally the exception. To reverse this situation, the EU must put in place regulatory measures to set strong sustainability and durability criteria for manufacturers to apply from the design stage of products.

State of play

On 30 March 2022, the [European Commission](#) presented the Sustainable Product Initiative (SPI) which includes an ambitious proposal to replace the Ecodesign Directive (the proposed Ecodesign for Sustainable Products Regulation – ESPR). In the [European Parliament](#) the ENVI, IMCO and ITRE committees are currently assessing the proposal. In the [Council](#), the Competitiveness Council is responsible for this file.

Recommendations for the Presidency

BEUC calls on the Swedish Presidency to support and swiftly adopt the European Commission's ambitious proposal to ensure that more sustainable products become the norm on the market.

What consumers need

- The extension of Ecodesign requirements to almost all products under the ESPR would benefit consumers in terms of more energy efficient, durable and repairable products. However, to ensure the Commission can deliver on this promise, it is essential they are provided with the necessary resources in terms of budget and staff.
- The development of meaningful Ecodesign Regulations must be accelerated and product groups, such as textiles or furniture, must be prioritised based on their environmental impact and on potential benefits for consumers. Existing Ecodesign rules must be swiftly revised to ensure alignment with technological advances. Moreover, voluntary agreements must no longer be allowed, as they often take a long time to be adopted and their level of ambition is too low.

- To accelerate the development of new measures, the Commission must prioritise the development of horizontal requirements applying to several product categories at once, including on durability, reparability and software update availability for digital and connected products.
- When the European Commission addresses a product group, it must look at the possibility to develop criteria for both Ecodesign and the EU Ecolabel at the same time. The EU Ecolabel must continue to be a step ahead and ensure its criteria reflect environmental excellence, while Ecodesign instruments must determine the minimum level of sustainability of products.
- The new Ecodesign Regulation must include strong enforcement and market surveillance tools and make online marketplaces liable for non-compliant products sold on their platforms, including products from third-party sellers.
- Consumers must have the possibility to access individual remedies for cases of non-conformity with Ecodesign requirements. To make this happen, there must be a better link between Ecodesign and the relevant consumer rights instruments (i.e. the Sales of Goods Directive, the Unfair Commercial Practices Directive and the Collective Redress instruments).
- The Ecodesign implementing measures must systematically introduce durability requirements that serve as the basis for establishing legal guarantee periods for more durable goods.

ADDITIONAL SOURCES

Ecodesign for sustainable products
regulation – key points for consumers
Position paper
BEUC-X-2022-083

Durable and repairable products: changes
needed for a successful path towards
the green transition
Position paper
BEUC-X-2021-061

Making more sustainable products the new
normal: consumer recommendations for a
meaningful EU sustainable product initiative
Position paper
BEUC-X-2021-075

Prompt: testing products to promote
longer lifetime
Factsheet
BEUC-X-2020-063

2

Substantiating green claims

Why it matters to consumers

Consumers' growing interest in making sustainable purchases has led to a rise of green claims and labels, which are not always reliable and accurate. With 3 out of 4 products carrying an environmental claim, the confusion and lack of trust on environmental information among Europeans is a real barrier to achieving the green transition. Only reliable, comparable and verifiable information should be displayed on products. The EU must therefore ensure that green claims are based on common assessment methods and communication rules and that sustainability labels are trustworthy.

State of play

In the March 2020 Circular Economy Action Plan, the **Commission** committed to require companies to substantiate their environmental claims through the Product Environmental Footprint (PEF) method. As the PEF method only assesses 16 environmental impacts, the **Commission** aimed to address environmental claims outside the PEF's scope in a proposal for a Directive on Empowering the Consumers for the Green Transition (ECGT), put forward in March 2022. However, the ECGT proposal has not set technical specifications for specific environmental claims, which are instead covered by a proposal on Substantiation of Green Claims now expected in early 2023.

Recommendations for the Presidency

BEUC calls on the Swedish Presidency to quickly launch discussions on the legislative proposal on substantiation of green claims as soon as it is published, with a view to achieve coherence with the Empowering the Consumers for the Green Transition Directive. Both pieces of legislation must, in combination, ensure that green claims and labels are robust and trustworthy.

What consumers need

- A holistic picture of the environmental impact of products. PEF should not be a standalone method complemented by other tools covering the aspects that it fails to address, such as substitution of hazardous substances, use of pesticides, biodiversity, microplastics...
- Clear assessment methods and communication rules for all green claims, by regulating also those outside of the scope of PEF but commonly used by market operators.
- A new EU registry of sustainability labels that meet robust credibility and transparency principles.
- Recognition of the EU Ecolabel and equivalent ISO Type I Ecolabels available in the EU as robust methods to substantiate green claims.
- Guarantees that green claims are backed by robust evidence building on the principle of 'no data, no claim'. Companies must be obliged to register the scientific evidence supporting their claims in an EU database enabling efficient market surveillance. The Digital Product Passport could also be considered in this respect.

- A robust governance process established to enable Member States and stakeholder involvement in the regulation of green claims, including during the development and assessment of the outcome of PEF rules for specific sectors. Any important shortcoming of PEF must be addressed before sustainability scoring systems or labels are displayed on products, notably avoiding any incoherence with EU sustainability goals.

ADDITIONAL SOURCES

Getting rid of greenwashing - Restoring
consumer confidence in green claims
Position paper
[BEUC-X-2020-116](#)

Getting rid of greenwashing - Restoring
consumer confidence in green claims
Factsheet
[BEUC-X-2020-115](#)

3

Alternative Fuels Infrastructure Regulation

Why it matters to consumers

Electric vehicles are increasingly popular with consumers, and the trend is expected to continue as the EU has decided to ban the sales of combustion engines by 2035. However, for the transition to succeed, charging an electric car should be easy and convenient. This means consumers must have easy access to enough, well-functioning charging stations, with transparent prices and the possibility to pay with a debit or credit card.

State of play

The **Commission** proposed in July 2021 to replace the existing Alternative Fuels Infrastructure Directive with a Regulation that would *inter alia* require Member States to ensure drivers can easily charge or refuel their electric vehicles across the EU. The **Council** took a position in June 2022, while the **Parliament** adopted its position in October 2022. A first trilogue took place in October, and the second meeting is scheduled in December 2022. The Swedish Presidency is expected to conclude the negotiations in the first months of 2023.

Recommendations for the Presidency

BEUC wants the Council to endorse the provisions foreseen by the European Parliament regarding the convenient use of recharging infrastructure which respond to long-standing concerns from consumer organisations across Europe.

What we need to succeed

BEUC urges the Council to endorse the following provisions contained in the European Parliament's position, especially regarding Article 5 of the future Regulation:

- The requirement to have payment card readers at all new publicly accessible charging points, and the retrofitting of payment card readers at existing charging points, by 2027
- The requirement for Member States to take appropriate measures to prevent unfair practices towards consumers, including in relation to prices set for the use of publicly accessible charging points, such as price gouging
- The requirement for all charging stations to display the ad hoc price per kWh
- The requirement for operators to swiftly repair their charge points when a malfunction has been detected
- The exchange of data between charge point operators and mobility service providers to improve the user experience of charging points (such as real-time availability)
- Display of relevant information to consumers along the road and at charging stations.

ADDITIONAL SOURCES

Electric cars: cheaper, more sustainable,
and long-lasting
Report
[BEUC-X-2022-053](#)

A consumer checklist for a sustainable
transport system
Consumer checklist
[BEUC-X-2020-111](#)

Putting our foot on the electric pedal:
BEUC position paper on the future of automotive
markets, with a focus on the revision of CO2
standards for cars and vans
Position paper
[BEUC-X-2021-047](#)

Making electric car charging convenient for
consumers - BEUC key asks for the Alternative
Fuels Infrastructure Regulation
Factsheet
[BEUC-X-2021-081](#)

Electric car ownership: an affordable
option for all consumers
Study
[BEUC-X-2021-040](#)

4

Initiative on rail ticketing

Why it matters to consumers

Consumers often have difficulties finding, comparing and booking multimodal and train tickets. This has to change if the EU really wants travellers to make more multimodal, and especially train, journeys. When looking for a train ticket or an integrated ticket, consumers must have access to all relevant information, including on prices, ancillary services, schedules, connections and delays. They also need better protection against delays and cancellations when travelling using different transport modes for the same journey.

State of play in legislative procedure

The **European Commission** is expected to present several proposals in the second quarter of 2023 to tackle these issues and promote multimodal digital mobility services (MDMS). These proposals are also due to include the revision of existing rules currently applicable to aviation (the Computerised Reservations Systems Code of Conduct).

Recommendations for the Presidency

BEUC calls on the Presidency to make this issue a priority in sustainable transport policy to ensure that this legislation is adopted by the Parliament and the Council before the end of the Parliament's mandate in 2024.

What we need to succeed

- Transport operators must share the data with transport service providers and open up their booking system to allow for the emergence of new multimodal services for consumers, such as integrated tickets.
- Contractual relationships and data sharing between the different market players must be established under fair conditions determined by EU law, with strong enforcement mechanisms.
- Consumers must have access to different transport options in a neutral way or based on their preferences. Self-preferencing (of booking platforms owned by a transport operator for example) must be forbidden.
- Liability mechanisms for stakeholders involved in ticketing and booking in case of disruptions or delays must be set up by an EU Regulation.
- Passenger rights must be strengthened and apply to multimodal trips.

ADDITIONAL SOURCES

Proposal for a European Year of the Rail 2021 –
BEUC's proposals to move towards a
consumer-oriented rail system
Position paper
BEUC-X-2020-041

European Year of Rail 2021 –
make rail more attractive, convenient and
accessible to passengers
Letter
BEUC-X-2020-051

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ENERGY

1

Energy Performance of Buildings Directive

Why it matters to consumers

Poorly insulated homes are bad for the environment, whereas more and more consumers want to combine what is good for their wallet and for the planet. Heating, and increasingly cooling, are a huge part of consumers' household budget and millions of consumers struggle to keep their homes warm or cool. This is why the retrofitting of our building stock is essential. It will benefit the planet – by cutting emissions – and consumers' wallets – by reducing household expenditure on energy bills. The revision of the Energy Performance of Buildings Directive is an opportunity to address these challenges, helping consumers to renovate their homes and to start making savings on their energy bills.

State of play

In December 2021, the **European Commission** proposed a revision of the Energy Performance of Buildings Directive. The **Council** reached a general agreement under the Czech Presidency. The agreement is weaker than the Commission's proposal on several key aspects for consumers. In the **European Parliament**, the vote in the Industry Committee is now expected for the end of January 2023.

Recommendations for the Presidency

BEUC calls on the Swedish Presidency to support Europe's effort to decarbonise its buildings by 2050. We therefore encourage the Presidency to facilitate and advance discussions in the Council to speed up renovation and ensure consumers can enjoy comfortable and healthy homes.

What consumers need

- Energy Performance Certificates (EPCs) must be improved to give consumers useful information such as an estimate of when their heating system will reach the end of its lifespan.
- Building Renovation Passports must be user-friendly and provided both in printed and digital form. Consistency with Energy Performance Certificates is needed to avoid redundancy and unnecessary additional costs. They must provide an estimated range of costs for recommended retrofit works.
- The introduction of Minimum Energy Performance Standards should increase renovation rates and provide guidance to consumers. This measure must foresee that by 2040, all homes should at least comply with an EPC D rating. However, further improvements are needed so that consumers, including those on low incomes, can have access to the right tools.

- Financial schemes must be tailored to low-income consumers and those in energy poverty, who face difficulties to finance their home renovations. Mainstream financial offers must be made inclusive via complementary financial instruments such as guarantee funds and revolving funds coupled to grants.
- Accelerated housing renovation via one-stop-shops which will not only support consumers at every stage of their renovation projects but also help accredited installers, e.g. by referencing training, providing support to fill in administrative forms and assuming part of the marketing of renovation. Mortgage Portfolio Standards must be introduced, making it mandatory for lenders to get EPCs for the homes they wish to renovate and to improve the average rating with the work.
- The removal of barriers to installing recharging points in residential buildings is a first step towards an EU-wide “right to plug” for consumers. However, further improvements are needed especially for existing non-residential buildings.
- Dynamic Energy Building Benchmarks, which collect data on yearly energy consumption and EPC rating of multi-unit buildings, must be created to make available data and information on the multi-unit building stock. They would inform policies, programmes and heat planning. This will be useful for consumers as they will be able to visualise where their building stands compared to similar buildings in the same area.
- A “heat pump readiness” standard to let consumers know how much they should invest in their property’s insulation before it makes sense to get a heat pump. Hence, homes will be fit for the electrification of heating systems by ensuring the best return on investment.

ADDITIONAL SOURCES

Energy Performance of Buildings Directive:
key points for consumers
Communication tool
[BEUC-X-2022-019](#)

How to make Energy Performance
Certificates consumer-friendly
Position paper
[BEUC-X-2021-046](#)

2

Electricity Directive

Why it matters to consumers

Electricity is an essential service for consumers. However, millions of households are struggling to pay their energy bills. Also, many consumers still find it difficult to understand what they are paying for, alternative offers and how to get a better deal or how to exercise their rights when something goes wrong. In addition, several consumers are exposed to unfair practices such as unilateral price increases or contract terminations. To restore trust and to help consumers better engage in electricity markets, consumers need better rights and protection.

State of play

In the first quarter of 2023, the **European Commission** is due to propose a revision of the 2019 Electricity Directive. The proposal will then be negotiated by the **Council** and the **European Parliament**.

Recommendations for the Presidency

BEUC calls on the Swedish Presidency to improve consumer rights and protection in electricity markets. Consumers should have access to easy-to-understand information, should be protected against wholesale price volatility and from unfair practices, and should have access to adequate assistance if they have a problem with their supplier or if their supplier goes bankrupt.

What consumers need

- Precontractual information must be much simpler and easier to understand, so that consumers are fully aware of what the contract they are signing up for entails.
- As regards price, consumers must always have access to affordable fixed price tariffs. Unilateral price increases of fixed price contracts should be prohibited. In case of variable electricity tariffs, suppliers must be required to take appropriate steps to protect consumers from bill shocks - e.g. by advising consumers without a smart meter to increase their monthly payment to avoid a too high settlement bill.
- Consumers must enjoy appropriate protection against disconnection. There must be a ban on disconnection during the entire year for vulnerable consumers and for those who need electricity for life-supporting appliances. There must also be a ban on disconnection during winter for all consumers, as not having energy for heating homes could be dangerous for health. There must also be a ban on disconnection during weekends and public holidays, so that consumers are not left without energy at a time in which they cannot seek and obtain support immediately.
- Consumers must have access to an alternative dispute resolution body specialised in energy, who can provide them support when something goes wrong.
- Member States must be required to appoint a Supplier of Last Resort, ensuring that consumers have access to electricity if their supplier goes bankrupt.

ADDITIONAL SOURCES



An electricity market that delivers to consumers
Position paper
BEUC-X-2022-111

3

Gas Directive and Gas Regulation

Why it matters to consumers

The ongoing energy crisis with skyrocketing energy prices impacts all consumers as they need to heat and cool their homes and move around. The best way to shield consumers from rising energy prices is to accelerate the shift to a renewable-based energy system, coupled with much stronger energy efficiency measures. It is also clear that hydrogen will remain an expensive source of energy and will not be a suitable option for consumers' heating and cooling needs and should not be promoted in residential heating.

While the role of gas should decrease, consumer rights and protections in the gas sector still lag those in electricity, whereas they should enjoy adequate rights and protection. It is important to fix this problem as millions of consumers will continue to use gas in the coming decades and they should enjoy sufficient protection.

State of play

In December 2021, the [European Commission](#) presented proposals to revise the Gas Directive and Gas Regulation which would *inter alia* update consumer rights and protection in the gas market. Work on the proposals is ongoing in both [Council](#) and [Parliament](#).

Recommendations for the Presidency

BEUC calls on the Swedish Presidency to give priority to work on the proposals. In doing so, we urge the Presidency to take account of the fact that hydrogen is not a viable option for residential heating and should be used only in sectors that are hard to electrify.

What consumers need

- Consumers must be well protected irrespective of the fuel they use. It is therefore key to mirror the rights and protection that currently exist in the Electricity Directive into the Gas Directive and, where relevant, to also improve them. Consumers should for example benefit from better precontractual information on gas supply offers and should have access to independent comparison tools covering the entire market.
- Consumer protection for vulnerable consumers and those in energy poverty must be further strengthened.
- Consumer protection must be updated with regards to digital development in the gas sector, for instance when using new tools such as automated switching tools.
- To protect consumers from being trapped in a very expensive energy future, the Gas Directive must not promote hydrogen blending in gas grids to decarbonise heating. Hydrogen will clearly remain an expensive source of energy and will not be a suitable option for consumers' heating and cooling needs and should not be promoted for residential heating.
- System operators must be legally required to ensure investments in gas and electricity networks are cost-efficient so that consumers enjoy affordable energy bills. This is only the case when they are based on a robust and independent assessment of future electricity and gas demand.

ADDITIONAL SOURCES

Towards consumer-friendly gas markets:
BEUC's preliminary views on the
upcoming gas market package
Position paper
[BEUC-X-2021-069](#)

How to design energy comparison tools that
are fit for consumers
Position paper
[BEUC-X-2022-014](#)

How to make consumer rights and
protections in gas future-proof
Position paper
[BEUC-X-2021-068](#)

4

Renewable Energy Directive

Why it matters to consumers

Following Russia's invasion of Ukraine, the case for a rapid clean energy transition has never been stronger. Consumers have been locked into an energy system that makes it easier and more affordable for them to use fossil fuels for their vehicles and to heat their homes. To tackle the climate and energy crisis and improve consumers' quality of life, a switch to renewables is needed.

State of play

As part of the Fit for 55 legislative package, the **European Commission** proposed a revision of the Renewable Energy Directive in July 2021. Work on the proposal is ongoing in both **Council** and **Parliament** with trilogues already under way.

Recommendations for the Presidency

BEUC calls on the Swedish Presidency to push not only for measures incentivising consumers to install solar panels and heat pumps but also to include provisions in the proposal to ensure that there are enough accredited professionals to install renewable energy appliances. Fossil fuel technologies, such as gas in cogeneration, should not be supported.

BEUC also calls for ensuring that gaseous and liquid fuels produced from hydrogen (RFNBOs) are produced with new, dedicated, renewable electricity power plants.

What consumers need

- There must be measures empowering consumers to shift to renewable energy in heating. This should be done through local heat planning, clarifying what heating systems are future proof for the climate and for consumers, and can hence be purchased confidently.
- Renewable based district heating and heat pumps are the cheapest and the most sustainable renewable based heating solutions and the proposed revision of the Renewable Energy Directive must therefore prioritise them over other renewable heating technologies. Measures ensuring that there are enough certified installers to roll out these renewable heating technologies are also urgently needed.
- The Directive must include measures to ensure that low income and vulnerable consumers receive support to switch to renewable heating. Additional support will also be needed for middle-income households so that they can afford to replace existing heating appliances.
- Renewable hydrogen must be produced from dedicated new renewable power generation units. Otherwise, producing renewable hydrogen will significantly increase overall electricity demand, further increasing electricity prices for consumers.

ADDITIONAL SOURCES

Renewable Energy Directive: key points for consumers
Communication tool
[BEUC-X-2021-079](#)

5

Energy Efficiency Directive

Why it matters to consumers

Consumers want to improve the comfort of their homes and to save energy, which is good for their wallets, for their health and for the planet. However, for consumers to undertake energy efficiency measures, further guidance and support are needed. Active consumer engagement will only work if all consumers can benefit from consumer rights and protection in heating and cooling. Vulnerable consumers and those in energy poverty need specific protection and support.

State of play

In July 2021, the [European Commission](#) proposed a revision of the Energy Efficiency Directive (EED) as part of the Fit for 55 legislative package. Trilogue negotiations have started during the Czech Presidency and are ongoing.

Recommendations for the Presidency

BEUC urges the Swedish Presidency to support an ambitious binding annual target for reducing energy use as well as a set of measures leading to further energy efficiency improvements and better consumer rights and protection on district heating markets. We encourage the Presidency to aim for an ambitious result and to prioritise guarantees that energy efficiency schemes are steered to those households who need it the most.

What consumers need

- The cheapest energy is that which we do not consume. A binding target will encourage Member States to adopt measures to help consumers to reduce their energy consumption.
- Member States must develop strategies to nudge consumers to engage with energy efficiency, such as gamification approaches to make energy efficiency fun for people.
- Local authorities must engage with consumers on their local heating and cooling plans so that consumers are aware and can make their investment decisions accordingly.
- Consumer rights in district heating must be improved because consumers are entitled to be well protected irrespective of the fuel they use. It is therefore key to mirror the rights and protections that currently exist in the Electricity Directive into the Energy Efficiency Directive for heating and cooling.
- Measures to tackle energy poverty are urgently needed. It is crucial that the revised Energy Efficiency Directive includes mandatory objectives for Energy Saving and Energy Efficiency Obligation Schemes to promote energy efficiency measures among energy poor households. The Directive must also target energy savings in multi-unit buildings and in rural areas, which require special attention.
- Easy access to independent advice via one-stop-shops, which must also offer operational support to people in their retrofit projects, is key. One-stop-shops must facilitate contacts between consumers, accredited installers and banks throughout retrofit projects.
- Innovative financial instruments and tools to minimise risks are urgently needed. To maximise the impact of such instruments, several regulatory barriers need to be addressed and consumer protection strengthened.

ADDITIONAL SOURCES

Energy Efficiency Directive:
key points for consumers
Communication tool
[BEUC-X-2021-078](#)

How to make district heating
fit for consumers
Position paper
[BEUC-X-2021-044](#)

How to make one-stop shops consumer-friendly
Position paper
[BEUC-X-2021-048](#)

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DIGITAL RIGHTS

1

Artificial Intelligence Act

Why it matters to consumers

Artificial intelligence (AI) is powering a whole range of new products and services, from digital assistants to autonomous cars as well as various ‘smart’ devices. All of this can bring benefits, but consumers are also at risk of being manipulated and subjected to discriminatory treatment and arbitrary, non-transparent decisions. Consumers must have strong and tangible rights that allow them to defend themselves when necessary and that empower them to reap the benefits of the digital transformation of our societies.

State of play

In April 2021, the **European Commission** proposed an Artificial Intelligence Regulation (AI Act). **Council** adopted its general approach in December 2022. Trilogue negotiations are set to begin in the first half of 2023, once the **European Parliament** adopts its position.

Recommendations for the Presidency

The Commission proposal and Council’s general approach do not give consumers the rights and protection they need. We urge the Swedish Presidency to give high priority to the upcoming trilogue negotiations. The AI Act must establish a strong framework so that AI systems respect fundamental and consumer rights and that consumers are adequately protected in case of harm. The EU should be a global standard setter in this area, just as it has been with the General Data Protection Regulation.

What consumers need

- All AI systems must be properly regulated, not just those classified as ‘high-risk’ (e.g. smart meters, AI-powered connected toys, virtual assistants, or AI which determines what people see on social media). The proposal must therefore have a broader scope and introduce a basic set of principles and obligations for trustworthy AI, e.g. on fairness, accountability and transparency, that apply to all AI systems.
- The list of ‘high-risk’ AI systems applications should be expanded. For example, it should include all retail insurance (not only related with health or life as per the Council’s general approach), and AI systems intended to be used by children and home assistants.

- The list of forbidden AI practices must be extended and strengthened to include additional harmful practices. AI practices that manipulate someone in a way that can cause them economic harm must also be covered, as well as practices that exploit vulnerabilities other than those related to age or disability. The use of remote biometric identification systems in public spaces, as well as the use of social scoring, must be banned both for public and private entities.
- Consumers must have a strong set of rights and access to effective remedies and redress mechanisms in case of harm, including collective redress. In particular, the AI Act must include a right for consumers to complain to a supervisory authority and be brought into the scope of the Representative Actions Directive (RAD).
- Harmonised standards must only be used to define technical requirements, not to define or apply legal principles and fundamental rights.
- Clear and efficient governance structure and enforcement mechanisms. For example, the Commission must be able to start an evaluation procedure about an AI system under certain circumstances.

ADDITIONAL SOURCES

AI Act – Consumer safeguards missing
in Council's compromise text
Letter

[BEUC-X-2022-120](#)

Regulating AI to protect the consumer –
Position Paper on the AI Act
Position paper

[BEUC-X-2021-088](#)

AI must be smart about our health
Position paper

[BEUC-X-2019-078](#)

Regulating Artificial Intelligence
Factsheet

[BEUC-X-2022-036](#)

Product liability 2.0 – How to make EU rules
fit for consumers in the digital age
Position paper

[BEUC-X-2020-024](#)

A consumer checklist on protecting consumers
from the risks of AI
Factsheet

[BEUC-X-2022-039](#)

Artificial Intelligence: What consumers say –
Findings and policy recommendations of a
multi-country survey on AI
Report

[BEUC-X-2020-078](#)

2

Cyber Resilience Act

Why it matters to consumers

The number of connected devices and digital services is skyrocketing. While digitisation provides many benefits for consumers and society, the risks and challenges it brings are equally – if not more – important. Consumers expect connected products to be safe and secure. Ensuring cybersecurity keeps up with digitisation of consumer products is of utmost importance in a connected world. Cyberattacks on connected products place consumers at risk and endanger their privacy, security and even physical safety. These attacks may even lead to fraud, personality theft and financial loss for consumers.

State of play

In September 2022, the **Commission** proposed a Regulation on horizontal cybersecurity requirements for products with digital elements (the Cyber Resilience Act). The **European Parliament** and **Council** are currently working on their respective positions.

Recommendations for the Presidency

The Swedish Presidency should treat the Cyber Resilience Act (CRA) as a priority and aim to reach a General Approach that provides the highest possible level of cybersecurity protection for consumers.

What consumers need

- Mandatory minimum security requirements that are applicable to all connected consumer products and their associated services, not only high-risk products. These requirements must include:
 - Security by design and provision of security updates
 - Strong authentication requirements
 - Encryption requirements.
- A clear legal obligation on manufacturers to ensure that connected consumer products are secure by design and by default.
- An obligation on manufacturers to monitor and address security vulnerabilities which covers the entire expected lifespan of a product.
- Mandatory third-party assessment for critical products considered of higher risk, including Consumer IoT devices - such as internet routers, child-accessible devices, smart home systems and security devices.
- Strong enforcement provisions that enable national authorities to remove insecure products from the market and allow consumers to benefit from effective remedies if something goes wrong (e.g. compensation and collective redress mechanisms). In particular, the CRA shall be referenced in the annex of the Representative Actions Directive (RAD) to allow the use of representative court actions by consumer organisations.

ADDITIONAL SOURCES

Cyber resilience act: cybersecurity of digital products and ancillary services
Position paper
[BEUC-X-2022-051](#)

Keeping Consumers Secure – How to tackle cybersecurity threats through EU Law
Position paper
[BEUC-X-2019-066](#)

Protecting European Consumers in the World of Connected Devices
Position paper
[BEUC-X-2021-091](#)

3

ePrivacy

Why it matters to consumers

Although beneficial to consumers, digital information technologies and the emergence of new services also represent a major challenge to the fundamental rights of privacy and personal data protection. It is important to ensure that consumers can benefit from innovative online services without having to give up their privacy rights. The ePrivacy reform is essential for strengthening individuals' right to privacy and the confidentiality of communications, as well as for rebuilding and reinforcing public trust and security in the digital economy.

State of play

In January 2017, the **European Commission** proposed a Regulation on ePrivacy. In October 2017, the **European Parliament** adopted a very strong and consumer-friendly position as its mandate for trilogue negotiations. In February 2021, the Portuguese Presidency adopted a mandate for trilogue negotiations, which started in May 2021 and have continued under the Slovenian, French and Czech Presidencies.

Recommendations for the Presidency

We urge the Swedish Presidency to swiftly conclude the trilogue negotiations. The new Regulation must not result in a lower level of protection compared to the existing ePrivacy Directive and the General Data Protection Regulation (GDPR).

What consumers need

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

ADDITIONAL SOURCES

ePrivacy Regulation: Recommendations for
trilogue negotiations
Position paper
[BEUC-X-2021-106](#)

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

ePrivacy
Letter to Permanent Representations in Brussels
Letter
[BEUC-X-2020-109](#)

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

Open letter to EU member states from consumer
groups, NGOs and industry representatives in
support of the ePrivacy Regulation
Letter
[BEUC-X-2019-056](#)

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

4

Data Act

Why it matters to consumers

When they use connected devices, consumers generate a great amount of data. Data is key for competition, consumer choice and innovation. However, consumers often cannot control how the data generated by their devices is used. This prevents them from being able to benefit from the added value that this data can unlock, for example accessing a wider choice of after sales services to repair their devices or the development of new innovative services associated to such devices.

State of play

In February 2021, the **European Commission** published a proposal for a Regulation on harmonised rules on fair access to and use of data generated using connected products or related services (Data Act). The Council adopted a progress report in December 2022. Trilogue negotiations are expected to start in the first half of 2023, once **Parliament** and **Council** adopt their respective positions.

Recommendations for the Presidency

BEUC encourages the Swedish Presidency to reach a trilogue agreement which duly prioritises protection of consumer interests. In particular, the Data Act must not undermine the General Data Protection Regulation or the ePrivacy Directive and must strengthen consumer rights and protection, giving them effective control over the data generated by their devices and protecting them from unfair practices by device manufacturers and third-party service providers.

What consumers need

The Data Act must:

- Ensure that consumers are in control of the data that their connected devices and associated services generate. They should be able to decide freely and control when and with whom to share or give access to this data.
- Protect consumers against unfair contractual obligations imposed by device manufacturers related to data access, and against deceptive interface design practices (so-called 'dark patterns') by manufacturers or third-party service providers aimed at prompting consumers to give access to their data.
- Include safeguards to prevent the further accumulation and exploitation of third-party data by gatekeeper companies, be it by gaining it from data holders or by monitoring users' and data recipients' interactions with data.
- Ensure that consumers have access to all the necessary remedies and redress mechanisms if their rights are not respected, including those envisaged under the Representative Actions Directive.

ADDITIONAL SOURCES

Giving consumers control of their data:
BEUC position paper on the Data Act proposal
Position paper
[BEUC-X-2022-103](#)

Consumers must be at the centre of the
Data Act proposal
Letter
[BEUC-X-2022-021](#)

For more information: digital@beuc.eu



INTERNATIONAL AFFAIRS

1

EU-US cooperation agenda

Why it matters to consumers

Consumers could benefit from a fairer and safer transatlantic market. Encouraging regulators on both sides to talk to each other can lead to better decision-making. Joint actions by EU and US regulators against market issues such as dangerous products sold online, greenwashing or buy-now-pay-later schemes could be an outcome of such talks.

State of play

In June 2021, the EU and the US officially launched a new cooperation agenda following their bilateral summit. This takes the form of many regulatory dialogues, including one on agriculture, one on competition, a taskforce for energy security, the Trade and Technology Council, and an informal consumer dialogue. Some, though not all, of these workstreams have featured public declarations and/or meetings.

Recommendations for the Presidency

We call on the Swedish Presidency to ensure that the European Commission sets up a clear overarching governance for the dialogues. This should prevent them from running in different directions on overlapping topics (such as digital affairs). Secondly, we recommend the Presidency urges EU institutions to proactively communicate about the dialogues' ongoing discussions and deliverables, while enabling civil society to give input on a continuing basis.

What consumers need

As the EU has done for trade negotiations, it should define a governance policy for its cooperation with the US. This policy must:

- Deliver to consumers: consumer protection and welfare are the overarching objectives of the cooperation. We specifically welcome the informal dialogue on consumer protection led by DG Justice on the EU side. At the same time, discussions on consumer-relevant themes in other dialogues should not run counter to the deliverables of this consumer protection dialogue.
- Be transparent and involve civil society: the public must be aware of what is discussed on their behalf. Regular consultation must be organised for the whole cooperation agenda. The Trade and Technology Council's 'Futurium' makes a start at this. Such consultation should be the case for all the dialogues and enable civil society to give substantive input. Consumer groups should be involved in the development of the consumer dialogue.

- Strive towards a fair, safe and just digital society. The cooperation should work towards a digital transformation that puts people at its centre. The EU should promote its digital legislation to inspire US policy developments.
- Put in place safeguards to prevent any regulatory ‘chilling effect’. This means that the cooperation must be used as a tool to find common solutions to common problems, rather than used to prevent either side from regulating.



2

World Trade Organization e-commerce negotiations

Why it matters to consumers

Consumers buy goods and services online every day. However, they can encounter various problems when buying from sellers located outside the EU. 87 countries are negotiating a new rulebook for e-commerce in the World Trade Organization (WTO). This initiative should therefore aim to protect consumers and bring them benefits.

State of play

In 2019, 76 countries – including the EU 28 – announced the launch of plurilateral negotiations on e-commerce. Since then, several rounds of negotiations have taken place. A consolidated text was agreed in December 2020. Several articles have been agreed, included on online consumer protection. 2023 has been announced as the year of discussions on sensitive topics – such as algorithms and data flows.

Recommendations for the Presidency

We call on the Swedish Presidency to ensure that the outcome of the WTO e-commerce negotiations will protect and benefit consumers. As the scope is likely to go beyond e-commerce, for example covering broader digital trade issues, we call on the Presidency to exercise caution so that the EU does not put citizens' fundamental rights at risk. Sensitive issues for consumers – such as data protection and artificial intelligence – must be regulated by EU law. Consumer organisations wish to avoid that weaker levels of protection are locked into a trade agreement, which would limit the EU's ability to enhance consumer protection in the future.

What consumers need

- The negotiations must bring tangible benefits to consumers, such as more transparent and affordable telecoms prices for consumers.
- The EU must fully preserve its ability to protect citizens' personal data and privacy. The rules on data flows agreed in the EU-New Zealand trade and cooperation agreement could be used as a model for WTO e-commerce. As stressed by the European Data Protection Supervisor, the EU must use its horizontal position on cross-border data flows, data protection and privacy in trade agreements (agreed in 2018).
- On net neutrality, we call on the Swedish Presidency to prevent any flexibility that would result in limiting access to the internet for EU citizens.
- The EU must prevent the inclusion of rules related to cybersecurity in this plurilateral context. It should not limit its ability to regulate on cybersecurity, nor promote self-regulation as an alternative. This is key to ensuring that connected products can be made safer for people.
- The EU must ensure that WTO e-commerce negotiations do not prevent authorities from auditing artificial intelligence systems. To that end, the Commission must revise its source code discipline proposal to narrow the exception. This is key to preventing bias and discrimination, as well as to protecting people's fundamental rights.
- Negotiating proposals and consolidated texts must be made public so that consumers know what is being negotiated on their behalf. The EU must encourage the co-conveners of the initiative to organise public briefings in Geneva.

ADDITIONAL SOURCES

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

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

Consumer and digital rights groups call on
the international joint initiative on e-commerce
to safeguard data protection and privacy
Statement
[BEUC-X-2020-112](#)

AI regulation in the EU and trade law, how
can accountability of AI and a high level
of consumer protection prevail over trade
discipline on source code?
Study commissioned by BEUC German
member vzbv
[January 2021](#)

3

Trade agreements with Australia

Why it matters to consumers

The goal of the EU's ongoing trade negotiations with Australia is to "help to deliver jobs, growth and investment, benefitting EU businesses and citizens alike". However, tangible benefits – such as reduced telecoms prices, prevention of geo-blocking practices and easy access to redress – are absent from current trade agreements. Consumer protection is not always guaranteed and can be undermined by tools like regulatory co-operation and investment protection if the agreements are not carefully designed.

State of play

Since the trade talks with Australia were officially launched in July 2018, many negotiation rounds have taken place. The EU has proposed ambitious rules for consumers, notably to enhance their online trust. Some proposals have already been merged into consolidated texts. BEUC understands the talks with Australia may conclude in 2023.

Recommendations for the Presidency

We call on the Swedish Presidency to ensure that the talks with Australia establish safeguards to protect consumers, and tools to bring them tangible benefits.

What consumers need

- Australia is interested to offer more transparent and affordable telecom prices to consumers travelling between the EU and Australia. The EU should explore how to materialise this in the upcoming trade agreement with Australia. Inspiration could notably come from the conditions currently extended to Ukraine on roaming under the Joint Statement by EU and Ukrainian operators on connectivity, as well as from a potential future agreement with Ukraine on roaming, as announced by the European Commission in September 2022.
- The EU needs to convince Australia of the value of its positive proposals for consumers. For instance, the EU needs to remain firm on its willingness to enhance online consumer trust in the chapter on digital trade. It should also insist on its approach to protect human health as a priority and to co-operate on antimicrobial resistance in the sanitary and phytosanitary chapter.
- The EU must ensure that its horizontal position on cross-border data flows, data protection and privacy in trade agreements remains non-negotiable. This is key to ensuring consumer trust in trade and preserving fundamental rights.

ADDITIONAL SOURCES

Australia

The consumer checklist for a positive
EU-Australia trade agreement
Factsheet
BEUC-X-2018-051

The consumer checklist for a positive
EU-Australia trade agreement
Position paper
BEUC-X-2018-053

For more information: international@beuc.eu



FOOD

1

Food Information to Consumers Regulation

Why it matters to consumers

Clear and comprehensive food labelling allows consumers to know what they are buying and to compare and select products easily according to their needs, preferences and interests. But today's food labels do not make it easy for consumers to spot the healthier option. They lack transparency on food origin and the composition and nutritional value of alcoholic beverages, and date marking is poorly understood by consumers.

State of play

As part of its 2020 Farm to Fork Strategy, the [European Commission](#) announced several legislative initiatives related to food labelling in a bid to “empower consumers to make informed, healthy and sustainable food choices”. In its 2021 action plan to turn the tide against cancer, it has further announced a proposal for improving consumer information on alcoholic beverages. A proposal for a revision of the Food Information to Consumers Regulation as regards front-of-pack nutrition labelling and nutrient profiles, origin labelling, date marking, and alcohol labelling was expected by the end of 2022 but is likely to be pushed back to early 2023.

Recommendations for the Presidency

We encourage the Swedish Presidency to initiate discussions on the proposal for a revision of the Food Information to Consumers law, with a particular focus on enabling informed consumer food choices.

What consumers need

- A mandatory EU-wide front-of-pack nutritional label to make the healthy choice easier for consumers. Evidence to date shows that Nutri-Score is the best-performing labelling scheme in aiding consumers to compare the nutritional value of foodstuffs.
- Mandatory country-of-origin labelling at least for milk, as well as for meat and milk used as ingredients in processed foods. Indication of the origin of fresh meat should also become compulsory in restaurants and in the food service sector.
- Nutrient profiles to prevent food that is high in fat, sugars and/or salt from claiming nutritional or health benefits.
- Mandatory labelling of the nutritional composition and list of ingredients on the bottle of alcoholic drinks.
- Clearer and more understandable date marking.

ADDITIONAL SOURCES

Revision of EU legislation on Food Information to Consumers
Position paper
BEUC-X-2022-024

2

Promotion policy for agricultural products

Why it matters to consumers

Despite evidence of Europeans' diets not being in line with healthy eating guidelines and having major environmental impacts, the EU continues to spend significant amounts of taxpayers' money to encourage consumption of e.g. meat and alcoholic beverages. To accompany and facilitate the shift in eating habits, the EU promotion programme should be aligned with recommendations for healthy and sustainable diets.

State of play

The **Commission** is undertaking a review of the promotion policy for agricultural products, with a view to bringing it more in line with the EU's Farm to Fork Strategy and Beating Cancer Plan objectives. A legislative proposal, initially due in Q1 2022, is now expected in early 2023.

Recommendations for the Presidency

We call on the Swedish Presidency to swiftly start discussions on the proposal for a revision of the EU promotion policy for agricultural products, with a particular focus on consumer interests and policy coherence.

What consumers need

- The EU must stop funding promotional campaigns for products Europeans should consume less of (including meat and alcoholic beverages). Instead, funds should be redirected to promote more consumption of fruit and vegetables, but also wholegrains, pulses and other foods Europeans should eat more of.
- New conditionality requirements and eligibility criteria must be introduced in the promotion policy to ensure full alignment with the Farm to Fork Strategy and EU Beating Cancer Plan.

ADDITIONAL SOURCES

BEUC response to public consultation on EU
Commission roadmap
BEUC letter
BEUC-L-2021-051

Sustainable food made easy
Position paper
BEUC-X-2022-108

For more information: food@beuc.eu



HEALTH

1

EU general pharmaceutical legislation

Why it matters to consumers

Consumers in Europe regularly encounter problems when trying to access medicines which are crucial for their health. For example, medicines may not be available at pharmacies or not be reimbursed because of their high price and the strain they put on public health budgets.

State of play

During the first half of 2023, the **European Commission** will table a proposal for a revised Directive on medicinal products, and a revised Regulation on the centralised marketing authorisation procedure and the European Medicines Agency.

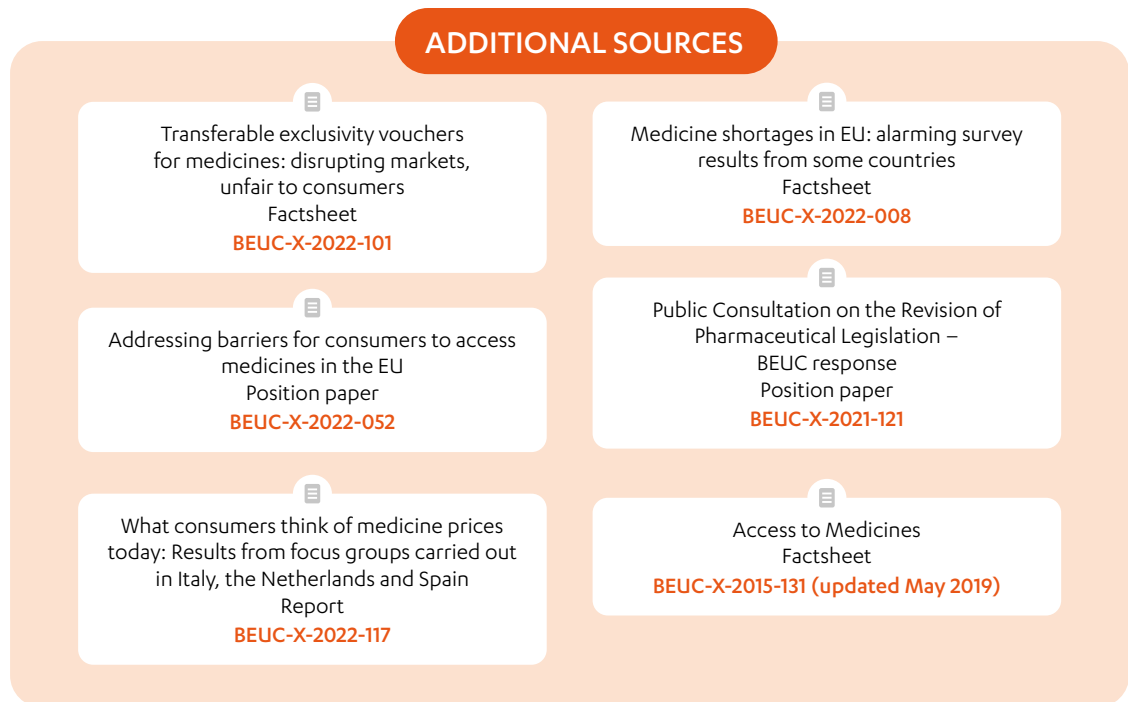
Recommendations for the Presidency

An exchange of views among Member States should swiftly be organised as it is urgent to identify policy solutions that improve marketing authorisation, availability and affordability of medicines.

What consumers need

- Safe and effective medicines that serve consumers' needs, and which are available.
- To improve marketing authorisation, companies must submit more robust evidence on medicines' safety and efficacy. Early approval schemes need to be limited to justified situations.
- Package leaflets must be legible and understandable and continue to be contained in the box of medicines. Digital information can only be a complement. Pharmacies should not be asked to print leaflets as this is burdensome for both consumers and pharmacies.
- To ensure equitable access to medicines, the revised legislation must introduce measures that contribute to the availability of centrally authorised products across the EU. In addition, pharma companies must submit drug shortage prevention plans to public authorities, keep some safety stocks and notify shortages earlier. Moreover, competent authorities must step up their monitoring of supply and demand and enable consumer reporting of shortages.
- To improve medicine affordability, it will be important to revisit the intellectual property incentives system. The introduction of generics and biosimilars on the market should be facilitated through a revised 'Bolar exemption'.

- To bring novel antibiotics to the market the European Health Emergency preparedness and Response Authority (HERA) must become an effective ‘medicine R&D coordinator’. To maximise public return on investment, public research funding must support the development of novel antibiotics through funding that includes access conditions. Transferable Exclusivity Vouchers are an instrument which is damaging for the affordability of medicines and must not be introduced.



2

European Health Data Space

Why it matters to consumers

Health data holds the potential to significantly advance our knowledge about disease prevention and treatment. Giving consumers better control of their health data while facilitating health professionals' access to such data can also improve cross border health services in the EU. However, the risks for consumers are high, given the sensitivity of health data. It is imperative that strong safeguards are established to guarantee personal data protection, privacy, security and accuracy for consumers to benefit from unlocking access to health data.

State of play

The **European Commission** published a legislative proposal for the European Health Data Space in May 2022. **Council** and **Parliament** are working on their respective positions.

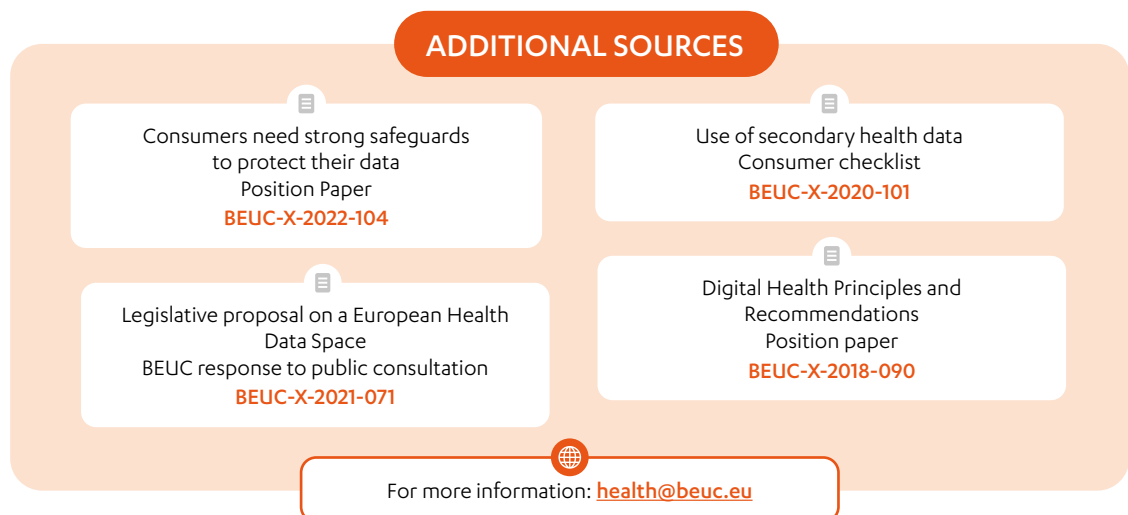
Recommendations for the Presidency

We encourage the Swedish Presidency to ensure that the Council position embeds the protection of consumers' health data, which are very sensitive, at the core of the future European Health Data Space.

What consumers need

The European Health Data Space must:

- Ensure consumers' access to and control over their own health data. Consumers must opt in to the 'primary use' of their health data and be able opt out of the 'secondary uses'. Genetic data, and wellness application data must be removed from the scope of the European Health Data Space.
- Include strong safeguards to prevent abuses through secondary use of health data by health professionals or research entities. The list of purposes for legitimate secondary use must be further restricted and there must be mandatory minimum quality requirements in the proposal regarding anonymisation and pseudonymisation of data.
- Guarantee a high level of data security and confidentiality. Electronic Health Record (EHR) systems must be reviewed and approved by a competent authority before entering the market and not be self-certified.
- Include adequate accountability, liability and redress mechanisms in case of data loss or misuse resulting in consumer harm. In particular, the EHDS proposal must be added to the Annex of the Representative Actions Directive.
- Be subject to strong public oversight and enforcement to ensure compliance with data protection rules and other legal obligations.





SAFETY

1

EU Chemicals Strategy for Sustainability

Why it matters to consumers

Consumers worry about their own – and their children’s – exposure to harmful chemicals. Product tests by BEUC members frequently detect chemicals of concern in products that consumers come into close, regular and prolonged contact with, including clothes, shoes, toys, childcare products and food packaging. The EU Chemicals Strategy for Sustainability, presented by the Commission in October 2020, acknowledges these concerns and commits the EU to address them through an ambitious action plan.

State of play

The **Commission’s** roll out of detailed measures under the Chemicals Strategy lies ahead. This includes the planned revision of the Regulation on Classification, Labelling and Packaging (CLP) of chemicals, which among other things will introduce a harmonised EU definition of endocrine disruptors. Preparatory work for the CLP revision is ongoing, with the Commission expected to present a legislative proposal either in late 2022 or during Q1 2023.

Recommendations for the Presidency

Building on the March 2021 Council conclusions on ‘Sustainable Chemicals Strategy of the Union: Time to Deliver’, we call on the Swedish Presidency to promote a high level of ambition within the Council concerning the design and implementation of the initiatives outlined in the Chemicals Strategy. We further encourage the Swedish Presidency to launch Council discussions on the planned revision of the CLP Regulation, with a view to swiftly reaching a general approach.

What consumers need

- To protect the health of current and future generations, the EU must radically scale up actions to minimise cumulative exposures to harmful chemicals. These actions must include an integrated policy on chemicals in products, better protection of vulnerable groups and a response to known policy gaps such as combination effects and endocrine disruptors.
- The EU must tackle both known and suspected endocrine disruptors by introducing new hazard classes in the CLP Regulation. Doing so will greatly expedite coherent identification and risk management of these harmful chemicals, including in downstream legislation on cosmetics, toys and food packaging.

- The CLP revision must ensure improved communication to consumers of hazard and safe use information by clarifying and further developing the labelling requirements for everyday cleaning and household products. Digital labelling must not replace on-product labels but could play a complementary role.

ADDITIONAL SOURCES

Joint BEUC-ETUC-EEB recommendations for chemicals policy and the European Green Deal
Position paper
[BEUC-X-2019-089](#)

Why moving essential product information online is a no-go
Position paper
[BEUC-X-2021-016](#)

Towards Toxic-Free Consumer Lives. BEUC's take on the Chemicals Strategy for Sustainability
Position paper
[BEUC-X-2021-038](#)

For more information: safety@beuc.eu



FINANCIAL SERVICES

1

Instant payments

Why it matters to consumers

Some banks now offer instant payment, a transfer where the beneficiary receives the funds in less than five seconds. This new transfer is as easy as using cash: the money is available immediately following payment. But the immediacy of this type of transaction also presents risks.

State of play

The **Commission** published a proposal for a Regulation on instant credit transfers in euro in October 2022, to make instant payments safer, more affordable, and a convenient payment option for consumers.

Recommendations for the Presidency

We urge the Swedish Presidency to support a swift adoption of the Council's position and seek agreement in trilogues during their Presidency so that instant payments soon become the new normal for consumers that wish to use them.

What consumers need

- Instant payments should become the “new normal”: banks providing transfer services should also be required to provide instant payments services.
- Targeted measures to allow consumers to easily modify or cancel transactions.
- Measures to prevent fraud, such as the use of ‘request to pay’ or ‘confirmation of payee’ solutions.
- In terms of fees, both instant payments and traditional transfers must be treated equally. The information provided by BEUC member organisations shows wide variations in the additional fees that banks charge for instant payments. These extra charges are significantly higher than those associated with traditional transfers, which is unacceptable.
- Instant payments will give the consumer the option of paying by transfer in stores. Consumer's freedom of choice with respect to the various payment instruments must be guaranteed.

ADDITIONAL SOURCES

How to make instant payments the new normal
Factsheet

BEUC-X-2022-035

A retail payments strategy for the EU
Position paper

BEUC-X-2020-072

Consumers and instant payments: Answers to the Commission's consultation on the content of a new legislation
Position paper

BEUC-X-2021-027

2

Distance Marketing of Financial Services Directive

Why it matters to consumers

With the spread of digitisation, which has been accelerated by the Covid-19 crisis, the sale and marketing of financial service products is increasingly moving online. This creates new opportunities, but also substantial risks for consumers. At the same time, traditional distance-marketing techniques, such as cold calling, are still used to lure the most vulnerable consumers. A horizontal safety net at EU-level covering all financial products, especially new products, remains important and needs to be updated.

State of play

In May 2022 the **European Commission** presented a proposal for a Directive to replace the current Directive dating from 2002. Trilogues are expected to start under the Swedish Presidency.

Recommendations for the Presidency

An update of the 2002 Directive is urgently needed. We encourage the Presidency to promptly start trilogue negotiations and to ensure a high level of comprehensive consumer protection.

What consumers need

- A horizontal safety net covering all financial products to protect consumers when it comes to aspects not covered by product-specific legislation and for new products which constantly come onto the market.
- Complete and clear pre-contractual information, a simplified procedure to use their right of withdrawal (in one click) and protection against all unsolicited sales, including pre-ticked boxes.

- Better protection when purchasing financial services online, for instance against deceptive interface design practices (so-called 'dark patterns') and the right to human intervention when automated decision-making procedures are used
- Strengthened enforcement powers and resources for national authorities and enhanced coordination among relevant authorities.

ADDITIONAL SOURCES

Distance Marketing of financial services
BEUC Position paper
BEUC-X-2022-097

3

Digital euro project

Why it matters to consumers

Today, the consumer has two main options to pay: either cash or an electronic payment (card, transfer or direct debit). Cash is managed by central banks, electronic payments by private banks. If cash is gradually no longer used, all payments will be in the hands of private banks. This is the main reason for the initiative of the European Central Bank (ECB) to create a digital version of the euro. Once adopted, the digital euro should possess the same characteristics as cash to bring an added value to consumers (e.g. same level of privacy as cash, high security standards, off-line availability).

State of play in legislative procedure

The **Commission** is due to issue a proposal for legislation in the second quarter of 2023. The ECB is currently undergoing an investigation looking at how a digital euro could be designed and distributed to retailers and the public, as well as the impact it would have on the market.

Recommendations for the Presidency

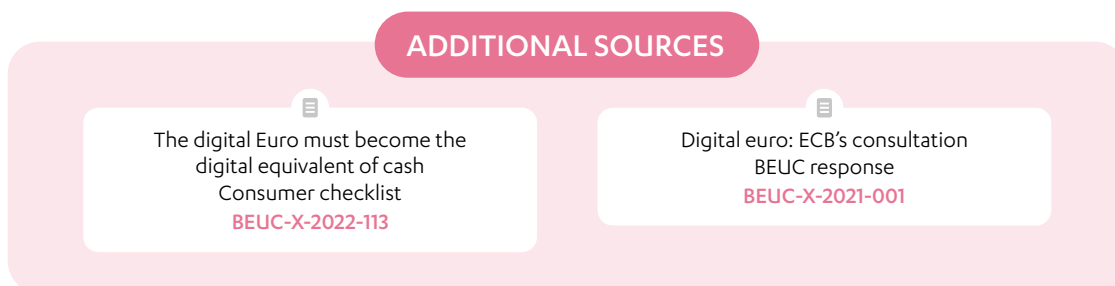
We encourage the Presidency to promptly start Council negotiations on the legislative framework for the digital euro, once presented by the Commission.

What consumers need

A digital euro must:

- be designed with consumers at heart and guided by the public interest, not that of private banks

- always follow the principles of privacy by design and by default allowing for anonymous transactions up to a certain amount in compliance with anti-money laundering laws
- be designed as a bearer instrument with the possibility to make off-line transactions to increase its resilience and acceptability
- improve financial inclusion and be offered to all consumers free of charge.



4

Payment Service Directive 2

Why it matters to consumers

Every consumer makes at least one payment transaction almost every day. The way consumers pay is changing. Moving from coins, notes, cheques, cards and wire transfers, payments increasingly take place online and via mobile phones. This allows for more payment options and more convenience but brings also new challenges to keep consumers' bank accounts, payment cards and e-wallets secure.

State of play in legislative procedure

The **Commission** is due to issue a proposal to revise the Payment Services Directive 2 in the second quarter of 2023.

Recommendations for the Presidency

We encourage the Presidency to promptly start Council negotiations on the proposal to revise the Payment Services Directive 2 once the Commission has presented it.

What consumers need

- A sound liability framework protecting them against fraud such as social engineering attacks.
- A high level of protection no matter the legal status of the service provider, be it a traditional bank, neo-bank or wallet provider.

- An efficient system of supervision which allows smooth handling of consumer complaints.
- Further improvements of strong customer authentication which:
 - is easy to use thanks to a standardised authentication procedure
 - does not require the newest smartphone to use it and
 - is systematically applied to all transactions.

ADDITIONAL SOURCES

Review of the payment services directive 2
BEUC recommendations
BEUC-X-2022-118

For more information: financialservices@beuc.eu

5

Retail Investment Strategy

Why it matters to consumers

Consumers need to be able to save, invest, and be protected effectively. This could be for their own retirement, large purchases like a home or renovations, their children's education, or to get appropriate insurance coverage in case of life events. To do this, it is necessary to invest money, to beat inflation but also to be able to increase their ability to afford things in general, both now and in the future.

State of play in legislative procedure

The **Commission** is due to propose legislation on a Retail Investment Strategy in the first quarter of 2023. Once published, the proposal will be negotiated by the **Council** and of the **European Parliament**.

Recommendations for the Presidency

- The EU needs to overhaul its key financial instruments such as the Markets in Financial Instruments Directive (MiFID II) and the Insurance Distribution Directive (IDD) because there are currently frequent mis-selling scandals in the EU's retail investment markets. The system also performs very poorly for consumers because they are often sold products that underperform and are not in their best interests but provide the biggest commissions for so-called financial advisers. We encourage the Presidency to promptly start Council negotiations on the Retail Investment Strategy proposal once the Commission has presented it with a view to ensuring an ambitious reform of retail financial services in the interest of consumers.

What consumers need

- To avoid conflicts of interest, the introduction of an EU-wide ban on financial inducements for financial advisers involved in the sale of retail financial products to consumers, based on the Dutch and UK experiences.
- The IDD must be strengthened to give the same level of consumer protection as MiFID II. In all future reforms, these two Directives must ensure the same levels of consumer protection to avoid regulatory arbitrage.
- Financial advisers must have a minimum level of expertise. Education and training requirements in both finance and sustainability must be raised to standards similar to those in the United Kingdom.

ADDITIONAL SOURCES

First step towards more impartial
financial advice for consumers
Press release

BEUC-PR-2020-021

The price of bad advice
Website

Transparency alone is not an option to ensure
retail investor protection against conflict of
interests in the financial industry
Letter

BEUC-X-2022-080

The case for independent advice
Factsheet

BEUC-X-2019-049

A Retail Investment Strategy for Europe
BEUC response to public consultation

BEUC-X-2021-073

6

Open Finance

Why it matters to consumers

The increased use of data and technology is changing the way that financial markets work for firms and consumers. New developments related to Open Banking and Open Finance have the potential to transform financial markets, increasing competition between firms to the benefit of consumers. However, new risks could emerge related to digitisation, including data protection and privacy concerns, discrimination and financial exclusion as well as detrimental personalised practices. The EU must put in place safeguards and rights so that consumers can benefit from new digital financial services.

State of play in legislative procedure

The **Commission** is due to present a legislative proposal for an Open Finance framework in the second quarter of 2023.

Recommendations for the Presidency

We encourage the Presidency to critically assess and discuss in Council the proposal for an Open Finance initiative, once it has been presented, to ensure that safeguards are put in place to protect consumers against the misuse of their data by both financial and non-financial operators seeking to enter financial markets.

What consumers need

- Consumers must remain in full control of their data, which should only be shared with third parties based on their explicit, informed consent.
- Consumers need to be adequately protected through clear liability rules against misuse of data including discrimination, data breaches, privacy and security risks associated with the sharing of consumers' financial data.
- Consumers must have a right to instruct their bank not to share their data with third parties, and consumers must be able to easily keep track through their bank which third parties they have granted consent and access to.
- When accessing consumer data, firms must strictly comply with the full requirements of the General Data Protection Regulation (GDPR). In addition, any reciprocal data access by financial entities to non-financial data must be rejected.

ADDITIONAL SOURCES



Making Open Finance Consumer Friendly
Factsheet

BEUC-X-2020-054



For more information: financialservices@beuc.eu



CONSUMER RIGHTS

1

Empowering consumers for the green transition

Why it matters to consumers

There is growing interest amongst consumers to choose more sustainable products, and in this way to reduce the negative impact their consumption has on the climate and the environment. However, all too often products are poorly designed and break too quickly. In addition, to make sustainable choices, consumers need reliable information and must be protected against misleading green claims, which abound on the EU market. They also need to be equipped with stronger rights that allow them to play a more active role in the transition to a circular consumption model.

State of play

In March 2022, the **European Commission** published a proposal for a Directive empowering consumers for the green transition through better protection against unfair practices and better information by amending the Unfair Commercial Practices Directive (UCPD) and the Consumer Rights Directive (CRD). The **Parliament** and the **Council** are currently working on their respective positions.

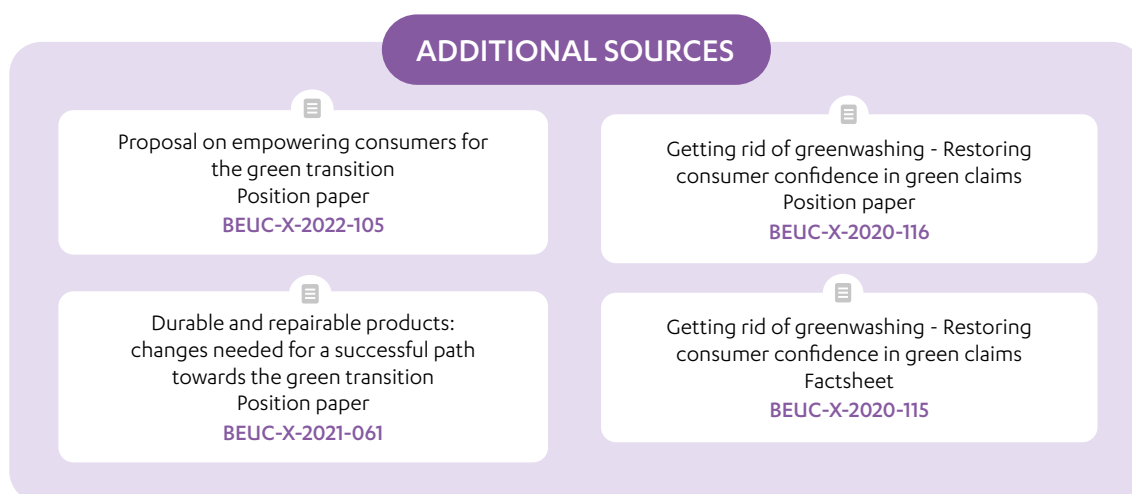
Recommendations for the Presidency

BEUC welcomes the proposal and sees it as a good first step to improving consumer information and rules protecting consumers from misleading practices. However, several improvements are needed. We call on the Swedish Presidency to seek rapid agreement on the proposal in Council and to ensure that the new rules will truly empower consumers for the green transition.

What consumers need

- Sustainability labels and sustainability information tools must be reliable and pre-approved before they can be present on the market. Their pre-approval by the national or EU authorities must depend on conformity with the minimum requirements defined in the legislation, subject to mutual recognition and published in the publicly available register.
- Instead of information on commercial guarantees of durability, consumers need information about the “guaranteed lifespan” of products. This information must be provided via an EU-wide mandatory label to allow consumers to compare products and easily identify those that are more durable. This mandatory label must always display at least the legal guarantee period with a possibility for manufacturers to expand it on a voluntary basis with a longer lifespan declaration. Such declarations must have the equivalent effect to expanding the legal guarantee period.

- Clear, comparable and credible information about the periods for which software updates will be available. Traders must be obliged to always take into account the existing legal requirements for how long the updates need to be supplied and display these periods as a minimum.
- Information on product repairability in a harmonised format (repairability score) must be available to enable easier product comparisons and to give a marketing advantage to more repairable products.
- Consumers must be protected against unfair commercial practices that cause the premature obsolescence of consumer goods, by explicit bans of certain practices. Some new practices should be added to this proposal, including a prohibition on marketing a good that fails to comply with the requirements of the Ecodesign Directive and a prohibition on bundling security updates with other types of software updates.
- There must be strengthened and more explicit rules protecting consumers from greenwashing practices. Certain claims that are impossible to be true from a scientific point of view, such as “carbon neutral” and equivalents, must be explicitly banned.



2

Sustainable consumption of goods – promoting the right to repair and reuse

Why it matters to consumers

Products often break down too quickly. Consumers are increasingly open to invest in buying better quality products, but they need a guarantee that they will be repaired if something goes wrong.

State of play

In the March 2020 Circular Economy Action Plan, the [European Commission](#) announced that it will consider introducing a “right to repair”. A legislative proposal, initially expected at the end of 2022, has been postponed to Spring 2023.

Recommendations for the Presidency

BEUC urges the Swedish Presidency to support an ambitious set of measures to ensure a proper right to repair for European consumers. We encourage the Presidency to promptly start Council negotiations on this proposal once the Commission presents it and to give it the high priority it requires.

What consumers need

- Longer legal guarantee periods for certain more durable goods which could be established via product policy legislation (Ecodesign implementing measures).
- Direct producer liability for non-conformity of products.
- Longer reversal of the burden of proof which should match the legal guarantee periods, to ensure that the guarantee rights can be exercised by consumers in practice.
- New measures encouraging repairs; imposing repair as the only available first-hand remedy is not a solution.
- Further strengthening the obligation to provide software updates in accordance with the lifespan of a product.
- Making sure that repairs are economically attractive for consumers and easily accessible.

ADDITIONAL SOURCES

Sustainable consumption of goods – promoting the right to repair and reuse
Position paper
BEUC-X-2022-034

Durable and repairable products: changes needed for a successful path towards the green transition
Position paper
BEUC-X-2021-061

3

Product Liability Directive and AI Liability Directive

Why it matters to consumers

The 36-year-old Product Liability Directive is outdated and thus fails to provide sufficient protection for consumers in the context of new digital technologies, such as connected devices and systems driven by artificial intelligence. Consumers also need additional protection in the light of the increasing commercial use of artificial intelligence.

State of play

In September 2022, the **European Commission** published a legislative package including a proposal to revise the Product Liability Directive and a proposal for a Directive on adapting non contractual civil liability rules to artificial intelligence (AI Liability Directive, AILD). The **European Parliament** and the **Council** are starting to work on their respective positions.

Recommendations for the Presidency

BEUC welcomes the European Commission proposal to modernise the Product Liability Directive and make its rules more accessible to consumers. We remain sceptical however regarding the approach chosen for the AILD proposal since consumers would need to prove fault on the side of the developer to obtain compensation for harms suffered due to an AI system. Given the level of opacity and complexity of AI systems, this would be very difficult for consumers, if not impossible. We call on the Swedish Presidency to seek rapid agreement on the proposals in Council and to ensure that consumers are protected if they face a damage from a defective good.

What consumers need

- The burden of proof must be shifted from the consumer to the company, because of the complex nature of products in the digital environment.
- The notion of 'defect' must be revised so as not to be determined exclusively from the 'safety' perspective, e.g. to also cover cybersecurity issues of connected devices.
- On-line marketplaces must be included in the scope of the Product Liability Directive and must become subsidiarily liable if the producer or importer of a defective product cannot be held liable for damage caused by a defective product.
- The risk-development defence or the late defect defence are incompatible with the dynamic nature of digital goods and must be revised.
- All types of damage must be compensated, including immaterial damage.
- All AI systems must be subject to a non-fault based liability regime, such as the strict liability regime of the PLD.

ADDITIONAL SOURCES

Adapting civil liability rules to the new digital technologies
Position paper
BEUC-X-2022-002

Product Liability 2.0: How to make EU rules fit for consumers in the digital age
Position paper
BEUC-X-2020-024

4

Better protection of passengers and their rights

Why it matters to consumers

Consumers often experience very stressful and frustrating issues such as delays and cancellations when travelling. They need strong passenger rights to protect them in such situations. EU legislation in this field has been a great achievement but, as shown by recent events such as the crisis caused by the world pandemic, it needs to be improved, especially in the area of enforcement.

State of play

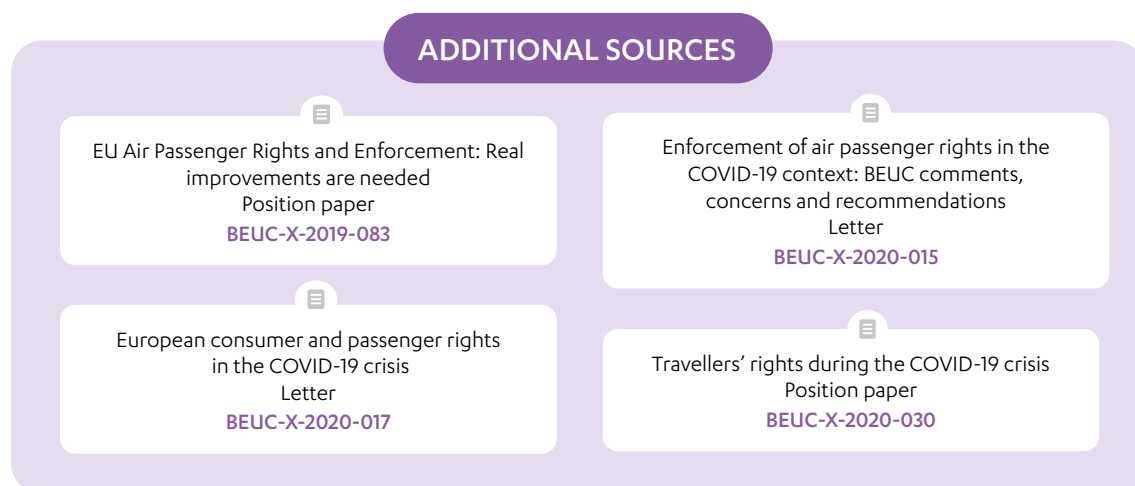
The **European Commission** is due to publish a Better Protection of Passengers and their Rights legislative proposal in Q2 2023, aiming to tackle five important horizontal issues such as: insolvency protection, intermediaries, better enforcement, right for passengers to cancel tickets in extraordinary circumstances and passenger rights in multimodal transport.

Recommendations for the Presidency

Once the Commission has presented the proposal, BEUC encourages the Presidency to promptly start Council negotiations on it.

What consumers need

- Efficient enforcement: innovative schemes should be considered to strengthen the enforcement of the passenger rights Regulations. These could include automatic reimbursement and compensation schemes, and mandatory participation in Alternative Dispute Resolution (ADR) bodies with binding decisions.
- A mandatory insolvency protection regime for airlines as already exists in the Package Travel Directive. Such a regime must cover at the very least reimbursement, repatriation of passengers, and any voluntary vouchers proposed to consumers as an alternative to monetary reimbursements.
- The progressive suppression of pre-payment practices in all passenger rights legislation.
- The right to cancel standalone tickets at no cost in case of unavoidable and extraordinary circumstances, such as the right that already exists in the Package Travel Directive.
- Clear, strong and easily enforceable rights for passengers using multimodal means of transport.
- The introduction of joint and several liability between online intermediaries selling transport tickets and travel operators, making it easier for consumers to exercise their rights.



5

Package Travel Directive

Why it matters to consumers

Consumers opting for package travel expect strong protection of their interests if something goes wrong with their trip. The Package Travel Directive is an important EU instrument that was supposed to ensure this is the case. However, recent events such as the pandemic and bankruptcies of travel agents have revealed some important shortcomings in the current framework that need to be corrected to ensure that consumers are still effectively protected.

State of play

The **European Commission** is due to publish its legislative proposal in Q2 2023.

Recommendations for the Presidency

BEUC encourages the Presidency to promptly start Council negotiations on this proposal once presented by the Commission.

What consumers need

- Effective enforcement, with such measures as mandatory participation in Alternative Dispute Resolution (ADR) schemes of tour operators, retailers and online intermediaries.
- Strong insolvency protection rules. The revision of the Directive must make sure that all vouchers are protected against the insolvency of the tour operator.

- Clear liability rules for online booking intermediaries regarding assistance, information and refund obligations to consumers.
- Clarification of the rules on consumers' right of withdrawal in case of unavoidable and extraordinary circumstances.
- A revised Package Travel Directive that is consistent with EU passenger rights legislation (e.g. insolvency protection for passengers buying standalone tickets and a right to cancel their journey in case of extraordinary circumstances should be introduced).

ADDITIONAL SOURCES



The Package Travel Directive: How to regain consumers' trust in the tourism sector
Position paper
BEUC-X-2021-115



For more information: consumer-rights@beuc.eu



ENFORCEMENT AND REDRESS

1

Legislative package for consumer protection enforcement

Why it matters to consumers

Enforcement of EU consumer law still mostly takes place at national level and so depends on the resources and powers of national authorities and courts. This results in significant differences in the rights consumers can exercise in practice. It is even more problematic when traders from non-EU countries cause harm – either by selling unsafe and dangerous products or by simply breaching EU consumer law. Due to gaps in legislation and enforcement, these traders often get away with their illicit practices, leaving EU consumers harmed and empty handed.

State of play

The **Commission** is due to propose a “consumer enforcement package” in 2023, which will include:

- **An evaluation and a revision of the EU Regulation on Consumer Protection Cooperation (CPC)** establishing rules for cooperation among national authorities when tackling widespread and cross-border infringements in the EU. The European Commission is due to propose amendments to the existing CPC Regulation by Q2 2023.
- **An evaluation and a revision of the existing consumer Alternative Dispute Resolution (ADR) regulatory framework.** Established in 2013, the consumer ADR framework has yet to be widely used in practice. The European Commission is due to propose a revision of the existing rules also by Q2 2023.

Recommendations for the Presidency

BEUC calls on the Presidency to initiate a discussion in the Council to encourage stronger and more efficient enforcement, in particular in the context of the announced consumer enforcement package. Furthermore, closer cooperation among various sector authorities could also be fostered, for example by organising discussions on these issues in a consumer conference or another type of joint event.

What consumers need

- Public authorities must actively investigate both national and cross-border infringements, reinforcing each other’s activities and cooperating closely with consumer associations.

- In certain circumstances, the European Commission must play a stronger enforcement role within the CPC framework. This should notably be the case to address widespread infringements with an EU dimension since they can have an impact on thousands of consumers throughout Europe. This would significantly help reduce coordination costs among national consumer authorities.
- Public authorities must also develop an interdisciplinary approach towards consumer protection in the data economy, bringing together consumer, data protection, competition and sectoral fields of law.
- Solutions must be found to ensure that traders from non-EU countries do not get away with breaking EU consumer law.
- Consumers must have access to high quality ADR entities across Europe to solve their disputes.

ADDITIONAL SOURCES

Stepping up the enforcement of consumer protection rules
Report
[BEUC-X-2020-083](#)

Alternative Dispute Resolution for Consumers:
Time to Move up a Gear
Position paper
[BEUC-X-2022-062](#)

2

Collective redress and support for qualified entities

Why it matters to consumers

From financial mis-selling scandals to faulty medical implants, consumers across the EU sometimes fall victim to products or services that cause them harm. But they usually have very little chance to get compensation in court because legal proceedings are expensive and time-consuming. In situations of mass harm, often the only realistic option for consumers is to try to obtain compensation by going to court together (collective redress). It is important that consumer associations and other entities representing harmed consumers can bring representative actions in practice and that they are not faced with too many barriers.

State of play

The adoption of the Directive on Representative Actions in 2020 was a huge milestone in the EU's consumer policy. However, the process of implementation at national level, which should be completed by December 2022, is lagging behind in many countries. Moreover, consumer associations have not always been consulted in the process.

In parallel, the **European Commission** is evaluating whether the existing EU private international law framework remains fit for purpose in the context of cross-border collective redress actions. The evaluation report is expected to be published in Q2 2023.

Recommendations for the Presidency

We ask the Presidency to support discussion between Member States and exchange of best practices on how to ensure the best implementation of the Directive, on adequate financing for representative actions, and on the revision of EU private international law rules applicable to cross-border mass claims.

What consumers need

- The criteria for who can become a ‘qualified entity’ to bring domestic representative actions should not be defined in such a way that prevents consumer associations from taking up this role.
- Consumer associations must be supported by governments to become strong private enforcers, using both injunctions and collective redress actions. This would deliver better access to justice and more equality for all European consumers, as well as ensuring that recovering consumer markets are also fair and transparent for competitors.
- EU private international law rules must be adapted to the specificities of cross-border representative actions. The Representative Actions Directive did not touch upon the existing EU private international law rules making the resolution of cross-border mass claims very complex and uncertain in practice.

ENDS

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- AT Arbeiterkammer
- AT Verein für Konsumenteninformation (VKI)
- BE Testachats/Testaankoop
- BG Асоциация Активни потребители
- CH Fédération Romande des Consommateurs
- CY Kypriakos Syndesmos Katanaloton
- CZ dTest
- DE Verbraucherzentrale Bundesverband (vzbv)
- DE Stiftung Warentest
- DK Forbrugerrådet Tænk
- EE Eesti tarbijakaitse Liit
- EL EKPIZO
- EL ΚΕΡΚΑ
- ES Asufin
- ES Confederación de consumidores y usuarios (CECU)
- ES Organización de consumidores y usuarios (OCU)
- FI Kuluttajaliitto – Konsumentförbundet ry
- FR Consommation, logement et cadre de vie (CLCV)
- FR UFC-Que Choisir
- HR Unija potrošača Hrvatske
- HU Fogyasztóvédelmi Egyesületek Országos Szövetsége (FEOSZ)
- HU Tudatos Vásárlók Egyesülete
- IE Consumers' Association of Ireland (CAI)
- IS Neytendasamtökin (NS)
- IT Adiconsum
- IT Altroconsumo
- IT Consumatori Italiani per l'Europa
- LT Vartotojų aljansas
- LV Latvijas Patērētāju interešu aizstāvības asociācija (LPIAA)
- LU Union Luxembourgeoise des Consommateurs (ULC)
- MK Organizacija na potrosuvacite na Makedonija (OPM)
- MT Għaqda tal-Konsumaturi
- NL Consumentenbond
- NO Forbrukerrådet
- PL Federacja Konsumentów
- PL Fundacja Konsumentów
- PT DECO
- RO Asociația Pro Consumatori
- SK Združenie slovenských spotrebiteľov (ZSS)
- SK Spoločnosti ochrany spotrebiteľov (S.O.S.)
- SE Sveriges Konsumenter
- SI Zveza Potrošnikov Slovenije (ZPS)
- UK Citizens Advice
- UK Legal Services Consumer Panel
- UK The Consumer Council of Northern Ireland
- UK Which?



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