



The Consumer Voice in Europe

Mr Valdis Dombrovskis  
Commissioner for Economy and  
Productivity; Implementation  
and Simplification  
European Commission

B- Brussels

*By email*

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**Subject: The simplification agenda must deliver for consumers**

Dear Commissioner Dombrovskis,

The Political Guidelines for the 2024-2029 European Commission rightly identify the need for a Union that is faster and simpler – and more supportive of people and companies. The implementation and simplification agenda you presented in February is a major stepping stone for achieving that vision. On behalf of BEUC, I would like to share our perspective on how simplification of EU rules can deliver visible improvements for consumers – and importantly where it cannot.

***Effective, enforceable EU laws are essential***

Europe's consumers need effective, enforceable EU laws that protect and promote their rights and interests, now and in future. Achieving the green and digital transitions while securing Europe's place in an increasingly unstable geopolitical environment likewise necessitates supportive, predictable EU rules. This fact is regrettably too often ignored by the current mainstream discourse which instead tends to view legislation as burdensome, unnecessary or even illegitimate (e.g. 'gold-plating'). Simplification likewise is framed by some as necessary for making business easier and faster in Europe – whereas the need to make life easier and better for people is neglected.

The simplification agenda must avoid this misguided notion of EU legislation. As you observed when presenting the agenda, the focus needs instead to be on delivering fast and visible improvements for people and business – and ultimately for a more prosperous, decarbonised and resilient EU. We agree that simplifying EU rules to achieve this aim is a legitimate effort. But simplification can never be a goal in itself – nor should making business easier and faster be the EU's paramount policy goal. The simplification agenda must be guided by our democratically agreed goals and targets for the transition towards a fairer and more sustainable economy.

### ***Simplification should reflect a broad, balanced societal perspective***

The European Commission needs to adopt a broad, balanced societal perspective on what should be achieved by simplifying EU rules. This should include proposals to

- Make it easier for companies including SMEs to develop and market innovative solutions and services that support the Green Deal objectives while also ensuring fairness by applying the polluter pays principle. Simplification must in contrast not reward the laggards by adapting standards to the lowest common denominator or by delaying the application of already agreed legal targets.
- Enable authorities to better implement and enforce EU legislation by making rules clearer and less burdensome to supervise. For example, a review of the Consumer Protection Cooperation Network Regulation offers an opportunity for more consistent enforcement and a level playing field if new powers were centralised within the Commission to act when companies breach EU laws across countries.
- Empower consumers by making it easier for them to exercise their rights under EU legislation. For example, it should be much more convenient for consumers to claim compensation when a flight is delayed or when harmed by AI, to get out of onerous subscriptions online or to find in one place relevant information for home retrofitting and energy efficient solutions.
- Improve legal certainty for consumers, businesses, national authorities and courts. For example, by using the upcoming Digital Fairness Act to address the unfair practices in the digital environment in a more explicit manner in addition to the existing principle-based rules of the consumer law acquis. This would send a clearer signal to the market on what is and what is not allowed, level the playing field and facilitate enforcement.

### ***Simplification must respect the principles of better law-making***

Simplification and good policymaking must involve those affected by the decisions. We therefore welcome the Commission's commitment to adhere to the better law-making principles and to legal certainty when making simplification proposals. The simplification efforts to date have however not adequately reflected this commitment. The initial omnibus proposals were for example prepared based on only limited opportunities for structured stakeholder involvement and there was little transparency of what could be expected even though consumers can be affected from those changes.

With several simplification proposals under preparation – including some that have yet to be announced to the public – it is imperative that the Commission follows efficient, open and transparent procedures to sustain trust among EU citizens. All proposals need to respect the Better Regulation approach including the 'evaluate first' principle while

any proposal that entails a policy choice by the Commission should be accompanied by an impact assessment to enable those affected to scrutinise – and where necessary challenge – the basis for the chosen policy option.

We hope you will find the above perspective a useful contribution to the further roll-out of the simplification agenda and we would warmly welcome an opportunity to discuss with you how to make Europe faster, simpler and crucially better for all.

Yours sincerely,

Agustín Reyna  
Director General