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# Danish Presidency of the European Union

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BEUC priorities  
2025



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2025

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## Introduction

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

Our Danish member is Forbrugerrådet Tænk.

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 count on the Danish Presidency to help shape the strategic agenda of the European Union in a way that serves both the economy and society.** EU policies should enable Europeans to live in a fair market – online and offline – where the sustainable choice is the easy and affordable one, and digitisation works to the benefit of all. Simplification of EU rules for businesses is now topping the European Commission agenda. BEUC and its members see some benefits for consumers, provided such initiatives withhold the essence and the main objectives of the targeted legislation.

**Numerous legislative and non-legislative files of relevance to consumers will be on the Danish Presidency's agenda,** including files from the previous mandate that need to be finally concluded or approved. We expect the Danish Presidency to help to finalise them in a way that benefits consumers. We would like to draw your particular attention to the following initiatives:

- **Green Claims Directive:** The proposed Directive should protect consumers from unverified claims and require companies to substantiate claims before they can be made public and put on the market. It should ensure that green claims are robust and trustworthy.
- **Payment Services Directive and Regulation:** Consumers are increasingly exposed to all sorts of online payment fraud so that it is becoming very difficult for them to know whether a transaction is legitimate or not. The review of the Payment Services Directive and Regulation offers a unique opportunity to develop a strong consumer protection framework against payment fraud and other fraudulent practices.
- **Reform of EU Customs Policy:** The reform aims to enhance consumer protection against dangerous products sold online and imported from outside the EU. Additionally, it should strengthen the enforcement of EU environmental standards, including Ecodesign, fostering more sustainable choices for consumers. It could also introduce handling fees to help customs authorities cope with the overwhelming volumes of e-commerce flows. These handling fees would be supported by importers, not consumers.
- **EU's general pharmaceutical legislation:** The revision brings the opportunity to enhance access to more affordable medicines. Consumers across Europe encounter obstacles when attempting to obtain medication necessary for improving their health. Medicines are either unavailable at pharmacies due to supply disruptions or are not reimbursed by public health agencies due to excessively high prices.
- **Critical Medicines Act:** The Commission's proposal aims at strengthening supply security for critical medicines and at enabling joint procurement for treatments for which there are inequalities in access. For example, medicines for rare diseases.
- **REACH revision:** The revision of the EU's most important chemicals legislation, REACH, should better prevent exposure to harmful chemicals, including by enhancing enforcement at the EU's borders and on online marketplaces. In parallel, the EU's efforts to simplify chemicals legislation overall should in no way lower protection standards.
- **Alternative Dispute Resolution:** The proposal to review the current Directive aims to modernise and simplify rules on out-of-court dispute resolution as well as to adapt them to digital markets and empower consumers in the digital transition.
- **The revision of the Package Travel Directive and the Passenger Rights initiatives:** The Air Passenger Rights revision and the proposals published as part of the 'Passenger Mobility Package' in 2023 should be reviewed consistently and provide a high level of consumer protection.
- **AI Liability Directive:** Although the Commission announced the withdrawal of its proposal, the EU needs to urgently modernise and further harmonise its civil liability rules to be better suited to the digital era. This initiative must ensure that consumers suffering harm from an AI system have access in practice to justice and redress.
- **Savings and Investments Union:** The objective is to incentivise consumers to invest their savings and to improve investment outcomes. Besides encouraging cross border competition, a low-cost saving and investment product for consumers would help to achieve these aims and tackle the increasing pensions gap.
- **The upcoming CAP reform:** The next CAP reform needs to become much more targeted and ensure that it aligns better with consumer priorities and expectations for subsidies, including a fairer distribution of the funds as well as rewarding farmers who make the effort to farm in more environmentally friendly ways.
- **EU's response to US tariffs and regulatory pressure:** The US are using tariffs as a coercive tool to obtain greater market access to the EU. This coercion includes pressures to adapt EU laws and weaken consumer protections. The EU must stand firm in enforcing its laws and prevent damages to consumers when designing its counter measures.

We count on the Danish Presidency to facilitate progress on these and other initiatives mentioned in this Memorandum, with an assertive aim of delivering clear benefits to European consumers.

We wish Denmark a most successful Presidency.



# CONSUMER RIGHTS

## 1

## Passenger rights

### Why it matters to consumers

Consumers often experience stressful and frustrating issues such as delays and cancellations when travelling in a single mode of transport or when combining different transport modes (Multimodal). 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 events such as the crisis caused by the COVID-19 pandemic, it needs to be improved, especially regarding enforcement and online booking intermediaries.

### State of play

In November 2023, the **European Commission** published two legislative proposals on passenger rights: (1) a proposal for a Regulation on passenger rights in the context of multimodal journeys and: (2) a proposal for a Regulation on the enforcement of passenger rights in the EU. The **Council** adopted its positions on both proposals in December 2024. In addition, in June 2025, the **Council** adopted its position on the 2013 proposal for a Revision of the Air Passenger Rights Regulation, after resuming negotiations that have been blocked for over a decade.

### Recommendations for the Presidency

BEUC encourages the Danish Presidency to drive the negotiations during the trilogues and to make sure that EU passenger rights are strengthened, not weakened.

### What consumers need

- Compensation rights in case of flight delays and cancellations should be upheld, not reduced.
- Efficient enforcement and easy access to redress: ambitious and innovative provisions must be considered to strengthen the enforcement of the passenger rights Regulations and ensure that consumers can easily assert their rights (e.g., automated refund, harmonised investigative and sanctioning powers for authorities, mandatory ADR participation for carriers).
- The non-exhaustive list of extraordinary circumstances should be aligned with the case law of the Court of Justice of the European Union.
- Core rights for multimodal passengers, such as information, re-routing, care and assistance should apply not only for passengers buying 'single multimodal contracts' <sup>1</sup> but also 'combined multimodal tickets'.<sup>2</sup>

<sup>1</sup> Transport contracts containing successive transport services, that only represent around 5% of all multimodal journeys.

<sup>2</sup> Tickets purchased via a single payment that represent separate transport contracts combined by the carrier or by the intermediary on their own initiative.

- Strong rules for online booking intermediaries should be introduced in *all* transport sectors, not only air. Such rules should:
  - Cover all types of cancellations and consumer refunds (including self-cancellations)
  - Introduce an intermediaries' liability for failure to provide pre-contractual information to passengers about the type of tickets and the associated rights when booking via intermediaries
  - Mandate the establishment by intermediaries of a complaint handling process and introduce a deadline for intermediaries to answer consumer complaints.
- A mandatory insolvency protection regime for airlines as already exists in the Package Travel Directive.
- No-show clauses should be prohibited for all types of flights.
- The right to cancel standalone tickets should be at no cost in case of unavoidable and extraordinary circumstances, such as in the Package Travel Directive.
- Hand luggage should be included in the basic plane ticket price free of charge. Consumer groups have denounced that some airlines unfairly charge passengers for their hand luggage.

#### ADDITIONAL SOURCES

## 2

## 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 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

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The **Commission** published a legislative proposal for a revision of the Package Travel Directive in November 2023, as a part of the 'Passenger Mobility Package'. The **Council** reached its General Approach in December 2024.

## Recommendations for the Presidency

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BEUC encourages the Danish Presidency to drive the trilogue negotiations once the European Parliament position is available.

## What consumers need

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- Stricter rules on limiting pre-payments.
- Clearer insolvency protection rules to ensure that voluntary vouchers and pending consumer reimbursement claims are also protected.
- Minimum requirements for vouchers.
- Clarification of consumer cancellation rights and the value of travel warnings.
- Clearer business to business rules to ensure timely consumer refunds.
- Efficient redress and enforcement measures.

### ADDITIONAL SOURCES

## 3

## Digital Fairness Act

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### Why it matters to consumers

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Digital asymmetry, defined as an omnipresent imbalance of power and knowledge in the digital world, puts consumers in a weaker position towards traders using new technologies. It also leads to completely new challenges that will need to be addressed not only by rethinking some core concepts of consumer law but also targeted new rules tackling specific unfair commercial practices online.



## State of play

In October 2024, the **European Commission** published the results of its Digital Fairness Fitness Check on consumer law. The report points out that existing EU legislation does not provide enough protection against harmful commercial practices online such as dark patterns, addictive design, influencer marketing and unfair personalisation. The report also finds that EU consumer law needs to be updated to close legal gaps and ensure more legal clarity. Based on the findings, the **European Commission** has announced it will develop a Digital Fairness Act to tackle those issues and potential other unfair commercial practices.

## Recommendations for the Presidency

BEUC calls on the Danish Presidency to encourage the European Commission to present an ambitious proposal for a Digital Fairness Act addressing the shortcomings of EU consumer law identified in the Digital Fairness Fitness Check report.

## What consumers need

- The digital environment must be fair by design and by default, supporting free choice and protecting consumers from known decision-making biases.
- The burden of proof for infringements of EU law must be on the trader where consumers don't have access to the relevant information.
- A clear and comprehensive horizontal prohibition on dark patterns must be introduced.
- The most harmful addictive design features must be prohibited or at least turned off by default.
- In-game premium currencies and gambling elements in video games (such as loot boxes) must be strictly regulated.
- Influencer marketing must be more transparent and prohibited for certain dangerous or risky products or services.
- Consumers must have more control over online personalisation and the use of sensitive data to exploit individual vulnerabilities must be prohibited.
- We need a robust European framework for protecting children online.

### ADDITIONAL SOURCES



For more information: [consumer-rights@beuc.eu](mailto:consumer-rights@beuc.eu)



# DIGITAL POLICY

## 1

## Protecting the General Data Protection Regulation

### Why it matters to consumers

The EU's General Data Protection Regulation (GDPR) is a pillar on which the digital economy in Europe now depends and is fundamental to protecting people's right to personal data. Reopening the GDPR could lead to a 'pandora box' effect. This would create legal uncertainty, potentially more costs for businesses and make personal data protection dependent on the size of the company, which would be at odds with the EU Charter of Fundamental Rights and the EU treaties.

### State of play

In May 2025, as part of its Fourth Omnibus Proposal on small mid-cap companies, the **European Commission** presented targeted amendments to the GDPR to exempt more companies from the obligation to hold documentation on its data processing.

### Recommendations for the Presidency

Documentation facilitates business compliance with the GDPR and facilitates authorities' oversight. Therefore, we recommend to not undermine the GDPR and refocus the discussion on better implementation and enforcement.

### What consumers need

- Focusing on improving the enforcement of the GDPR, particularly in cross-border cases. The European Commission conducted thorough evaluation reports which did not find evidence pointing to a need to reopen the GDPR. The latest evaluation report and the Competitiveness Compass instead rightly identified a need to improve its implementation and enforcement.
- Measures to support small companies to raise awareness about their obligations and facilitate their compliance with the GDPR. It is in people's interest to ensure all companies comply with the law. However, this should not require amending the GDPR.

#### ADDITIONAL SOURCES

## 2

## AI Liability Directive

### Why it matters to consumers

Consumers need protection in light of the increasing commercial use of artificial intelligence (AI). While the widespread use of AI may provide many benefits, it also presents significant challenges and risks to consumers from which they are insufficiently protected. Consumers need to know who to hold responsible if they suffer harm from an AI system. They need a clear and enforceable legal framework that gives consumers access to justice, including in the digital context.

### 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). Although the Product Liability Directive was recently adopted, the **European Parliament** and the **Council** are still working on their respective positions on the AI Liability Directive. In its 2025 work programme, the **European Commission** announced its intention to withdraw the proposal. The Parliament's conference of committee chairs has [requested](#) the European Commission to reconsider the withdrawal.

### Recommendations for the Presidency

We call on the Danish Presidency and Member States to continue their work on AI liability rules and, in case of withdrawal, urge the Commission to immediately begin preparatory work on new AI liability rules, in line with the Better Regulation policy to ensure effective protection for consumers if they suffer harm from a defective AI product.

### What consumers need

- A non-fault-based liability approach. The current proposal would require consumers to prove a fault by the AI system's operator to claim compensation. This would make it very difficult, if not impossible, for consumers to lodge a claim.
- A reversed burden of proof. Consumers must only have to prove the damage they suffered and the involvement of an AI system.
- The Directive must cover both material and non-material harm. This is already the case under other legislation such as the GDPR and the Package Travel Directive. All types of harm, including non-material harm (e.g. pain, loss of an opportunity or inconvenience) must be compensated.

#### ADDITIONAL SOURCES

## 3

## Digital Networks Act

### Why it matters to consumers

EU telecoms regulation has been a success story for the past three decades. Fair and competitive markets, combined with effective regulatory measures, have been the driving force behind investment, innovation and consumer welfare. The aims announced for a 'Digital Networks Act' to enable market deregulation, consolidation and challenge net neutrality would run contrary to the EU's achievements over recent decades.

### State of play

Following a European Commission White Paper in February 2024 and a public consultation BEUC [responded](#) to, Commission President von der Leyen announced the **Commission** will propose a Digital Networks Act. EU Member States adopted conclusions on "EU's future digital infrastructure needs" in December 2024.

### Recommendations for the Presidency

As the Danish Presidency is expected to continue discussions on the future Digital Networks Act, we encourage the Presidency to ensure the preservation of the pro-competitive and consumer-centric regulatory framework for EU telecoms, while opposing proposals for further deregulation, challenging net neutrality and reducing competition in this sector. We recommend the Danish Presidency to ensure that any upcoming proposal is strictly evidence-based, fully observes the European Commission's Better Regulation Principles, and is preceded by a proper impact assessment and a public consultation.

### What consumers need

- Member States and regulators to ensure the Code is fully implemented and enforced across the EU.
- The Digital Networks Act should not question the primary objectives of the EU legal framework for electronic communications enshrined in the European Electronic Communications Code (EECC) of "promoting competition, the internal market, and the safeguard of end-user interests."
- Consumers need affordable, high-quality access to the internet to be able to participate in a digital society and economy.
- Any potential measure to increase investment in high-quality broadband connectivity infrastructure should preserve a high level of competition, ensure net neutrality and avoid market deregulation.
- Reaching the 2030 connectivity targets must prioritise the deployment of infrastructure to areas where connectivity is lacking, focusing on remote areas and supporting vulnerable consumers.
- Completing the EU Single Market for electronic communications should concentrate on promoting competition and protecting consumers, with a focus on removing barriers for consumers to use and access telecoms services.
- Network fees or other types of 'direct contributions' by content providers to telecom operators that could amount to a 'sending-party-pays' system should be rejected.

## ADDITIONAL SOURCES

## 4

## ePrivacy

### Why it matters to consumers

Although beneficial to consumers, current and emerging technologies represent a major challenge to the fundamental rights of privacy and personal data protection. Consumers should benefit from innovative products and online services without having to give up their privacy rights. A reform of the 2002 ePrivacy Directive is essential to strengthen 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. In February 2021, the Portuguese Presidency adopted a mandate for trilogue negotiations. Trilogues started in May 2021 but have not reached a political agreement yet. In their conclusions on The Future of EU Digital Policy, Member States asked the Commission to assess the functioning and shortcomings of the ePrivacy Directive. In its 2025 work programme, the **European Commission** announced its intention to withdraw its proposal.

### Recommendations for the Presidency

We urge the Danish Presidency to follow up on the Council's 'Future of EU Digital Policy' conclusions and invite the European Commission to share its plans to upgrade consumers' electronic privacy following the announced withdrawal of the proposal. The result must not lead to a lower level of protection compared to the existing ePrivacy Directive and the GDPR.

## What consumers need

- Electronic communications must be confidential. 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 consumers 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.
- Consumers should be able to rely on NGOs to represent their interests, and take initiatives whenever users' rights have been breached, in line with the European Parliament's position.

### ADDITIONAL SOURCES



For more information: [digital@beuc.eu](mailto:digital@beuc.eu)



# ENERGY

## 1

## The Commission's strategies on energy and housing

### Why it matters to consumers

Costs for energy and housing continue to put consumers' budgets under real pressure and many people from across Europe are increasingly facing hurdles to afford their bills. The EU needs to tackle the root causes of high energy and housing prices e.g. through making energetic housing renovation and retrofit affordable and convenient.

### State of play

In her mission letters to the Commissioners-designate, President von der Leyen instructed her new team to come up with different strategies and action plans on energy policy at the beginning of the new mandate. The **Commission** already proposed an 'Action Plan for Affordable Energy', which gives a good overview of the many aspects needed to make clean energy a reality for Europeans. This Plan is due to be followed by many initiatives during the Danish Presidency including a 'Citizens Energy Package'. At the same time, the **European Commission** is consulting stakeholders regarding an 'Affordable Housing Plan'.

### Recommendations for the Presidency

BEUC calls on the Danish Presidency to contribute to the preparation of, and to launch discussions on, the roll-out of these energy strategies. This could, for instance, include discussions in the Council about what priority measures the action plans should include.

### What consumers need

- The Affordable Housing Plan should not only focus on new constructions but also include measures on retrofitting the existing housing stock. It will be particularly important for the new plan to tackle the key question of financing and cover measures on how to best combine private and public financing of energy retrofits for instance.
- The Affordable Energy Action Plan's follow-up initiatives should promote concrete measures to lower energy prices through giving consumers access to clean energy, while helping them navigate the complex energy market. Important consumer-facing initiatives or actions that will be launched, discussed or developed during your Presidency include areas such as: lowering high taxation and levies on electricity; furthering deployment of renewable energy; looking at measures to boost flexible use of electricity; readying the electricity grid; setting up a strategy on cooling and heating decarbonisation; and digitalising the energy sector.

- The 'Citizens Energy Package' should provide detailed recommendations on how to practically implement the new consumer energy rights and protections introduced under the last mandate. The new package should touch upon emerging issues, such as how to best protect consumers signing up to dynamic price contracts, stronger protection in district heating markets and protection of vulnerable consumers when gas networks are decommissioned.

#### ADDITIONAL SOURCES



For more information: [energy@beuc.eu](mailto:energy@beuc.eu)





# ENFORCEMENT AND REDRESS

## 1

## Consumer Alternative Dispute Resolution

### Why it matters to consumers

Over the coming years, improving rights, enforcement structures and redress measures across multiple sectors will be essential for consumer welfare. Consumer alternative dispute resolution (ADR) gives consumers and traders the possibility to resolve disputes out-of-court via the input of a third-party and through a process which should be simple, fast and inexpensive. It is particularly important for small value claims where consumers may have no possibility to claim redress in court. Yet ADR has not fully taken off in many European countries and is not running satisfactorily in all business sectors.

### State of play

In October 2023, the **Commission** proposed a review of the existing Directive to modernise and simplify rules on out-of-court dispute resolution and to adapt them to digital markets. The **European Parliament** and the **Council** adopted their respective positions on the proposal in 2024 and trilogue negotiations have started in May 2025.

### Recommendations for the Presidency

It is important that the EU upgrades existing rules to ensure ADR delivers for consumers and is a viable pathway to obtain redress. BEUC calls on the Danish Presidency to conclude the trilogue discussions with the aim of enabling consumer ADR bodies across Europe to be stronger and more efficient, to operate in all economic sectors and to comply with strong quality criteria.

### What consumers need

- The quality requirements, particularly those relating to the independence, expertise and impartiality of ADR entities, should be strengthened to ensure consumers (including the most vulnerable) can benefit from high-quality ADR services.
- Traders' participation in ADR should be mandatory in all sectors. At the very least, traders' participation should be mandatory in sectors yielding the highest number of consumer complaints (e.g. transport).
- All procedural barriers hindering consumers' access to consumer ADR should be removed and ADR should be free of charge for consumers.

## ADDITIONAL SOURCE

## 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 multiple products or services that cause 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 do not face too many barriers.

### State of play

The adoption of the Representative Actions Directive in 2020 was a milestone in EU consumer policy. However, implementation at national level, which should have been completed by December 2022, is lagging behind in a few countries (such as Luxemburg and Spain).

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.

### Recommendations for the Presidency

We ask the Danish Presidency to hold a discussion in Council about the way the Directive has been implemented in Member States. Particular attention must be given to sufficient financing for representative actions and the revision of EU private international law rules applicable to cross-border mass claims.

## What consumers need

- 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 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.
- There is today no evidence showing that third-party litigation funding (TPLF) has had detrimental consequences and brought abusive litigation in Europe. On the contrary, TPLF remains a crucial option for organisations willing to bring court cases as they are very expensive. Discussions on the need to regulate TPLF funding are premature and should not take place before the Representative Action Directive will be evaluated in 2028.

### ADDITIONAL SOURCE



For more information: [enforcement@beuc.eu](mailto:enforcement@beuc.eu)



# FINANCIAL SERVICES

## 1

## Digital euro project and the future of cash

### Why it matters to consumers

Today, the consumer has two main options to pay: either cash or electronic means (card, transfer or direct debit). Cash is managed by central banks, electronic payments by private banks. As payments are becoming increasingly digital, more payments will be in the hands of private banks. This is the main reason for the European Central Bank (ECB) initiative to create a digital version of the euro. Once adopted, it 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

The **Commission** published legislative proposals on the digital euro and on the legal tender of cash in June 2023. Both Parliament and Council negotiation mandates are still outstanding.

### Recommendations for the Presidency

We encourage the Danish Presidency to continue Council negotiations on the legislative framework for the digital euro with a view to adopting a Council position.

### What consumers need

A digital euro must:

- Be designed with consumers at its 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.
- Offer the possibility to make offline transactions to increase its resilience and acceptability.
- Improve financial inclusion and be offered to all consumers free of charge.
- Ensure fair reimbursement in case of fraud in the form of charge-back mechanisms.

In addition, cash must continue to be accepted widely and remain easily accessible to consumers.

## ADDITIONAL SOURCES

Everyone needs to make payments: the importance of inclusive payment methods  
Factsheet  
BEUC-X-2023-044

## 2

## Payment Services Directive and Regulation

### Why it matters to consumers

Today, the landscape of consumer transactions is constantly evolving, with individuals engaging in payment transactions almost daily. The traditional modes of payment, such as cash and cheques are gradually being replaced by online and mobile-based payment methods, offering more convenience and more options. However, this transition presents a dual challenge: while it provides increased flexibility, it also introduces new vulnerabilities, demanding better security for consumers' bank accounts, payment cards and e-wallets. The surge in payment fraud, particularly within credit transfers, is a worrying trend. A sophisticated fraud industry exploits advanced tactics, leveraging technologies like artificial intelligence to deceive consumers.

### State of play

Published by the **Commission** in June 2023, the Payment Services package consists of two legislative proposals: for a Regulation and a Directive. The **European Parliament** voted its report in plenary in April 2024. The Council adopted its General Approach under the Polish Presidency.

### Recommendations for the Presidency

We encourage the Danish Presidency to start trilogue negotiations on the Payment Services package with a view to adopting a final political agreement.

## What consumers need

- A sound liability framework protecting them against fraud such as social engineering attacks.
- The right to a refund in all cases of fraud, including for authorised transactions. Currently consumers have no right to a refund for fraud involving authorised transactions. The Commission now proposes to change this, but only for a very narrow fraud scenario. In many cases, consumers would not be refunded under the proposed new legislative framework (e.g. impersonation of a tax official/police, family member, colleague, fake shops/fake investment platforms). From a consumer perspective, there is no difference between these cases and hence there should be a refund in all cases.
- Banks must be made liable for all fraud scenarios to incentivise banks to invest in fraud prevention and avoid a situation where fraud prevention is focused solely on the narrow case of bank impersonation. Currently, there is no financial incentive for banks to invest in fraud prevention as the fraud losses are borne by consumers.
- An efficient system of supervision which allows smooth handling of consumer complaints.
- Further improvements of strong customer authentication so as to remove barriers for people with disabilities or without a smartphone.

### ADDITIONAL SOURCES

## 3

## Savings and Investment Union

### 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 have appropriate reserves 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. As it stands, retail investment products in the EU underperform significantly, leading consumers to refrain from engaging with this market. In addition, significant proportions of European consumers lack easy access to a reasonable quality retirement savings product.

## State of play

While no formal proposal for a Savings and Investment Union has been published, the current narrative circles around increasing consumer participation in capital markets, as a way to fund European industries. The Retail Investment Strategy will be negotiated in trilogue under the Danish Presidency.

The Commission Communication on the Savings and Investment Union foresees a standardised, simple and low-cost saving and investment product for consumers but a legislative proposal to this effect is not yet on the table.

## Recommendations for the Presidency

We encourage the Danish Presidency to focus on the consumers' perspective during trilogue negotiations on the Retail Investment Strategy proposal, securing a sound approach to the value for money system including high-quality reporting standards. In view of the Savings and Investment Union, we encourage the Danish Presidency to discuss possible options ensuring that high-quality and low-cost savings and investment products become available and are effectively distributed to consumers.

## What consumers need

- To avoid conflicts of interest, an EU-wide ban on inducements for financial advisers involved in the sale of retail financial products, based on the Dutch and UK experiences. In the absence of political support, alternatives must include a ban on inducements for sales without advice.
- Effective value for money rules to contain the worst excesses allowed by the current market failure. Whether by stronger supervision or legislation, investment products whose quality is too low to justify to consumers must be removed from the market.
- A review of the results of this process must happen as soon as possible, to check if the current package has contributed to reducing consumer harm - the proposed review clause should not therefore be diluted.
- The Savings and Investment Union must focus on improving the situation of retail investors to make this market attractive to them. Unless consumers' investment outcomes improve, higher engagement is unlikely.
- To address the pensions gap, it is important to establish a standard investment product, at low cost and offering high returns, that is easily accessible to all EU consumers. Auto-enrolment features could circumvent the failure of our current financial advice architecture and so render this possible.

### ADDITIONAL SOURCES

Poor financial advice costs consumers a fortune, but that's just the tip of the iceberg  
Factsheet  
**BEUC-X-2023-063**

## 4

## 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

The **Commission** published in June 2023 a proposal for a Regulation on Financial Data Access (FiDA). The **European Parliament** adopted its position in April 2023. The **Council** adopted its position in December 2024.

### Recommendations for the Presidency

We encourage the Danish Presidency to promptly start trilogue negotiations on the FiDA proposal. During these negotiations, it is important to ensure 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

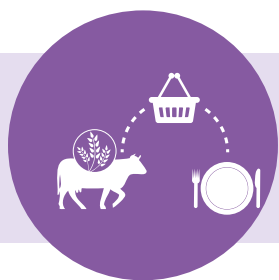
- Consumers must remain in full control of their data, which must be shared with third parties only with their valid permission and based on a legal ground defined under the GDPR.
- Data categories falling in the scope of the FiDA proposal must be further circumscribed, so that they include only financially relevant data. Data resulting from profiling activities must be excluded due to the high risk of discrimination.
- Data perimeters must be legally binding and cover more retail banking services and insurance products, due to the high risk of exclusion for consumers.
- Permission dashboards must ensure this tool helps consumers to better control their data. Dashboards must be easy to find and access, while their design and the information displayed must abide by EU data protection and consumer law legislation, such as the GDPR and the Unfair Commercial Practices Directive.
- When accessing consumer data, firms must strictly comply with the full requirements of the GDPR. In addition, any reciprocal data access by financial entities to non-financial data must be rejected. 'Gatekeepers' as defined under the Digital Markets Act must not receive access to financial data so as to prevent financial exclusion as a result of the combination of different data categories and an unfair competitive advantage.

#### ADDITIONAL SOURCE



For more information: [financialservices@beuc.eu](mailto:financialservices@beuc.eu)





# FOOD

## 1

## Reform of the Common Agricultural Policy

### Why it matters to consumers

The Common Agricultural Policy (CAP) represents close to a third of the total EU budget for the period 2021-2027. Although there is broad support among consumers for a strong CAP budget overall, the way farm subsidies are currently being used and distributed does not sufficiently align with consumer priorities. Moreover, a key objective of the CAP – ensuring reasonable food prices for consumers – is not being met.

### State of play

The next cycle of CAP reform is due to begin in the second half of 2025, during the Danish Presidency. The **European Commission** has indicated that it intends to publish the legislative proposals in mid-July, shortly after the EU's plans for the next multiannual budget (MFF) have been unveiled. Considering the geopolitical context and new EU political priorities, there are question marks over the future amount and distribution of agricultural subsidies.

### Recommendations for the Presidency

The Danish Presidency should ensure that consumer concerns and priorities regarding how CAP subsidies are distributed and spent are better reflected in the next CAP (including concerns on social and environmental challenges).

### What consumers need

- The CAP represents a significant amount of the EU budget, i.e. about a third. As such, to retain its social license and legitimacy in the eyes of consumers it needs to align more closely with how consumers would like farming subsidies to be distributed and spent.
- The CAP needs to be much more targeted. Less than one in four consumers find that the CAP subsidies are fairly distributed, either amongst countries or between different types of farms. At the same time, two thirds want subsidies to go primarily to small- and medium-farms and young farmers. The concepts of degressivity and capping as mentioned in the Vision for Agriculture and Food should be supported.
- CAP subsidies should support farmers – both big and small – for adopting more sustainable practices which respond to environmental challenges. Financial incentives can help to reward such farmers. However, incentives are not a substitute for baseline environmental protection via conditionalities.

- In 2024, food prices in the EU were 40% higher on average than the levels seen before the Russian invasion of Ukraine in 2022. Our BEUC consumer survey on the CAP showed that almost one third of consumers reported difficulties in dealing with food expenses. Against these findings, the Commission should assess the extent to which, if at all, the CAP can still play a role in securing affordable food for consumers.
- Sustainable food consumption policies need to accompany more sustainable food production practices, such as the improvement of food environments.

#### ADDITIONAL SOURCES

## 2

## Fairness of the food supply chain

### Why it matters to consumers

Food prices have reached unprecedentedly high levels over the past couple of years in the EU, pushing many consumers towards less healthy, less sustainable food or even to restrict the amount of food they eat. At the same time, farmers have taken to the streets to call for a fairer revenue, raising questions on the (in)equitable distribution of costs and margins in the food supply chain. A fairer food supply chain must benefit farmers and consumers alike.

### State of play

In March 2024, the **Commission** outlined plans for a series of measures aimed at improving the position of farmers in the food supply chain. The EU Agri-Food Chain Observatory (AFCO) on costs, margins and trading practices was set up to increase transparency in the chain, and the **Commission** has made a series of targeted amendments to the Directive on Unfair Trading Practices (UTP) and the Common Market Organisation (CMO) regulation in December 2024.

### Recommendations for the Presidency

We encourage the Danish Presidency to critically assess and discuss the above-mentioned proposals within the Council to ensure they promote a fair food supply from farm to fork, where costs and benefits are equitably shared among the various actors, and consumers are not disproportionately burdened.

## What consumers need

- The EU AFCD must bring much-needed transparency on where consumers' money goes in the food supply chain.
- The current derogations to competition law granted under the CMO regulation should not be extended further at the risk of facilitating price-fixing cartels – the worst form of anti-competitive agreements. Instead, the UTP Directive must be effectively enforced and, where needed, strengthened, to ensure fair prices to farmers.
- Consumers expect food imported into the EU from third countries to comply with the same standards (such as on the environment and animal welfare) as EU products. Import requirements must be introduced in EU legislation to ensure fair markets for farmers and consumers alike. Notably, the Council should push the Commission to finally publish:
  - The animal welfare legislation revision proposals, including provisions to apply the same requirements to imports as to domestic production.
  - The pending implementing act that is still needed for the ban on using antimicrobials for growth promotion to effectively apply to imports.

### ADDITIONAL SOURCES



For more information: [food@beuc.eu](mailto:food@beuc.eu)



# HEALTH

## 1

## Access to medicines

### Why it matters to consumers

Consumer surveys have revealed that people struggle to get the medicines they need because of shortages. Latest data shows that half of those who had experienced a medicine shortage said it had a negative impact on their health.<sup>3</sup> In addition, focus groups carried out with BEUC members showed consumers consider medicines an essential good. As a result, high drug prices and excessive profits by pharma companies do not sit well with consumers, and even less so when they consider public sector financial support for the development of medicines which leads often to excessive private profits. High medicine prices fuel inequalities in patient access across the EU and hinder the financial sustainability of healthcare systems.

### State of play

In April 2023, the **European Commission** tabled a proposal for a revised Directive on medicinal products, and a revised Regulation on the centralised marketing authorisation procedure and the European Medicines Agency. In April 2024, the **European Parliament** adopted its position on the legislative package. The **Council** reached an agreement in June this year. In addition, earlier in the year the **European Commission** published its proposal for a Critical Medicines Act.

### Recommendations for the Presidency

The Danish Presidency should contribute to ensure that the EU adopts a pro-consumer pharmaceutical legislation. Consumers need urgent solutions that improve access to safe, effective and affordable medicines. The Danish Presidency should also help ensure that measures to strengthen medicines' supply chains through the Critical Medicines Act provide tangible benefits to consumers.

### What consumers need

The revised EU pharma legislation must:

- Improve marketing authorisation standards, not weaken them. This involves ensuring that schemes for the early approval of medicines like 'conditional marketing authorisation' are used only in justified situations and with strict post-marketing requirements.

<sup>3</sup> <https://www.euroconsumers.org/wp-content/uploads/2024/07/Drug-shortages-survey-report-2.pdf>

- Push drug developers to conduct clinical trials that compare the benefits of new medicines against the best available treatments. This will help patients get quicker access to the best possible treatments and improve the financial sustainability of health budgets.
- Ensure that consumers are consulted in discussions on paper package leaflet and electronic product information. Digital information can only be a complement and QR codes must be designed in ways that ensure users' privacy.
- Introduce measures that contribute to the availability of centrally authorised products across the EU. To help prevent shortages, pharma companies must submit drug shortage prevention plans to public authorities, keep some safety stocks, particularly for critical medicines, and must notify shortages earlier. Moreover, competent authorities must step up their monitoring of supply and demand and enable consumer reporting of shortages.
- Ensure a better balance between innovation and affordability by establishing different and shorter data and market protection periods according to the type of product (e.g. modulation based on unmet medical needs), and by making it easier for public authorities to lift monopolies if necessary to protect public health. In addition, the legislation must facilitate access to cheaper medicines by removing any obstacles that prevent the entry of generics and biosimilars on the market as soon as IP rights on the originator product expire.
- Increase transparency on drug research and development costs so authorities can negotiate more fairly with pharma companies on the price of new medicines.
- Support the development of novel antibiotics through fairer means, including through the Health Emergency Preparedness and Response Authority (HERA) and a scheme of 'push and pull' incentives. For example, inducements in exchange for meeting some milestones along the R&D chain, joint procurement, and payment models that de-link volumes from profits (revenue guarantee).

The Critical Medicines Act must:

- Facilitate joint procurement by Member States beyond crisis situations, for example for expensive cancer treatments.
- Ensure coordinated approaches to stockpiling.
- Foster partnerships and trade agreements with third countries that lead to more diversified supply chains.
- Ensure that the provision of State Aid complies with competition rules and principles and goes hand in hand with conditionalities on medicine availability affordability.
- Support non-profit production models.

## ADDITIONAL SOURCES



For more information: [health@beuc.eu](mailto:health@beuc.eu)



# INTERNATIONAL AFFAIRS

## 1

## EU-US relations

### Why it matters to consumers

Consumers in the EU and the US face similar challenges. Maintaining cooperation between regulators on both sides of the Atlantic can help better protect consumers. On the other hand, a deterioration of the transatlantic relationship in the form of a trade war would negatively impact consumers, leading to increased prices and reduced choice.

### State of play

President Trump announced reciprocal tariffs against EU products early April 2025, and soon after triggered a 90-day pause. The end of this pause will coincide with the start of the Danish Presidency. The EU counter-measures will be defined at the end of June or early July 2025. They could be activated during the first weeks of the Danish Presidency.

### Recommendations for the Presidency

We call on the Danish Presidency to avoid a trade war scenario. Indeed, the EU might be tempted to retaliate in case of increased US tariffs on EU goods. We encourage the Presidency to explore other options and maintain cooperation between EU and US consumer protection regulators, such as on the rise of e-commerce flows affecting EU and US customs.

### What consumers need

- Consumers should not be the collateral victims of a potential trade war.
  - The EU must stand firm and enforce its laws designed to protect EU consumers and ensure EU's competitiveness.
  - If the EU needs to retaliate on goods, it must not include in its list products for which there are not enough alternatives, for example almonds. To enable European consumers to play their part in the green transition, the EU should refrain from imposing high tariffs on clean tech products such as heat pumps imported from the US. Moreover, in this era of medicines shortages and rising prices, the EU must not impose tariffs on pharmaceutical products. The EU should monitor the impact of potential tariffs on US products on EU consumer prices and choice.
  - The EU should refrain from triggering the anti-coercion instrument as it could limit EU consumer access to key services. Should it decide to use it to retaliate against US coercion despite our concerns, the EU must not create obstacles to services for which EU consumers have little alternatives. This is the case of payment services and retail investment products.

## ADDITIONAL SOURCES

## 2

## Customs reform

### Why it matters to consumers

A significant proportion of household appliances, clothes, toys and food comes from outside the EU. International e-commerce is causing these imports to grow rapidly. While consumers may think all imports are safe and comply with EU standards, the reality is more complicated. BEUC members have found a significant inflow of non-compliant, dangerous and low-quality products coming into the EU. EU law requires traders to inform consumers of the total cost at purchase, yet consumers are sometimes charged unexpected import fees upon delivery.

### State of play

The **Commission** proposed in May 2023 to reform EU customs policy, and the **Parliament** adopted its position in April 2024. The **Commission** suggested to Council to amend its upcoming position in May 2025 in order to introduce handling fees to help customs authorities cope with the increased e-commerce volumes. The **Council** has been working on its position since summer 2024 and while significant progress has been made, the Danish Presidency will have a key role to play in coming to an agreement on this proposal.

### Recommendations for the Presidency

This reform is of utmost importance to better protect consumers from dangerous and non-compliant products in the Single Market and ensure they comply with EU environmental requirements, such as Ecodesign. We call on the Danish Presidency to facilitate the swift adoption of an ambitious Council position, which should complement the consumer protection rules included in the Commission's proposal and the Parliament's position.

## What consumers need

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- Well-resourced customs authorities: to fulfil their mission, they need more financial and human resources. Training resources should be available as well as efficient IT tools to support their work. The idea of introducing handling fees to support authorities could be part of the solution, as long as it is supported by importers and not consumers.
- Effective cross-checking of products between authorities: customs authorities must exchange information through a common data hub. They should also work better together on-site and be trained jointly.
- Safe and compliant imports: we call on the Council to preserve the concept of 'deemed importer' as it could contribute to improving the enforcement of EU law, including safety and sustainability. It should be accompanied by deterring sanctions in case of infringement of non-fiscal obligations.
- No more surprise import fees: the concept of a deemed importer would also ensure that consumers do not have to pay extra customs duties at the time of delivery. We call on the Danish Presidency to echo the Parliament's position to ensure that any other fees will be paid by the importer and deemed importer, beyond customs duties, to fully put an end to surprise custom fees for consumers.

### ADDITIONAL SOURCES

## 3

## EU-UK relations

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### Why it matters to consumers

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The UK and EU are major trading partners. Their relationship matters given the impact it can have on the choices, rights and protections that UK and EU consumers can expect when consuming goods and services from each other's markets such as household goods, food and travel. Consumers from both sides of the Channel face common challenges, such as the cost-of-living crisis, scams, and the rise of dangerous products reaching their homes.



## State of play

The EU and the UK trade relations are based on the Trade and Cooperation Agreement (TCA) concluded in 2020. The relationship has been improving recently, and the EU and the UK are now considering options to strengthen their relationship, on issues such as mobility and food safety. The bilateral summit of 19 May 2025 gave further impetus to deepening the partnership.

## Recommendations for the Presidency

We call on the Danish Presidency to contribute to further improving the relationship. It is time to enter a new phase of normalisation of the relationship, based on mutual trust and aiming at enhancing consumer welfare.

## What consumers need

- Cooperation between market surveillance authorities to keep consumers safe: this cooperation foreseen in the TCA should be fully operational as soon as possible.
- Preventing unfair practices: A meaningful way to better protect consumers against these practices would be cooperation between the UK Competition and Markets Authority (CMA) and the EU Consumer Protection Cooperation (CPC) Network.
- Combatting fraud: The existing cooperation on financial services between the EU and the UK should focus on scams including discussions on the right for reimbursement for consumers, fraud prevention measures and obligations for online platforms etc. to help prevent fraud.
- Conclude a sanitary and phytosanitary (SPS) agreement: this would facilitate trade in food and contribute to making food more affordable to consumers, while maintaining robust checks.
- Special attention to Northern Ireland: EU retailers and online marketplaces have decided to no longer deliver to Northern Ireland, creating supply issues for consumers. This should be monitored. We also recommend creating a parcel dialogue between authorities, operators and consumer organisations to monitor new parcel processes under the Windsor Framework.

### ADDITIONAL SOURCES

## 4

## Digital trade

### Why it matters to consumers

EU consumers frequently shop online, but when buying from non-EU sellers, they are exposed to risks such as insufficient traceability of traders, unsafe products and unfair AI systems. It can also be complicated for consumers to act if something goes wrong. Recent EU trade agreements have begun to address

this issue through digital trade provisions or standalone Digital Trade Agreements, which is a positive development. However, the EU is also including other rules in its trade agreements on cross-border data flows and access to source code, which could undermine consumer privacy and limit regulatory oversight of algorithmic systems.

## State of play

In 2025, the EU concluded the negotiations of Digital Trade Agreements with Singapore and South Korea, while accelerating negotiations with Indonesia, the Philippines, Thailand, and Malaysia. This new type of deal focuses solely on digital trade and reflects the EU's ambition to become the global standard-setter for digital trade rules and cross-border data flows.

## Recommendations for the Presidency

We call on the Danish Presidency to ensure that these digital trade deals are designed with consumers' interests at their core. They should enhance consumer trust online without undermining the EU's ability to regulate, enforce its laws, or uphold fundamental protections in the long run. Sensitive issues for consumers, such as cross-border data flows and access to source code, should be excluded from trade talks

## What consumers need

- The EU must fully preserve its ability to protect citizens' personal data and privacy. The EU should no longer include rules on data flows in its agreements. Should the EU pursue such negotiations despite our concerns, the rules on data flows agreed in the EU-New Zealand trade and cooperation agreement should be used as a model, not the ones agreed with Japan in October 2023 or with Singapore in July 2024.
- The EU must ensure that restrictions on accessing source code do not prevent authorities from scrutinising AI and software-based systems, which is essential for algorithmic transparency and accountability. To that end, the EU should stop including source code rules in its trade agreements. If the EU decides otherwise, the Commission should revise its proposals on source code in ongoing negotiations to narrow the exceptions.

### ADDITIONAL SOURCES



# SAFETY

## 1

## Chemicals safety

### Why it matters to consumers

Consumers worry about their own – and their children’s – exposure to harmful chemicals. Product testing by BEUC members show that dangerous – and often illegal – chemicals are prevalent in many everyday consumer goods such as clothes or childcare products. A reform of the main EU chemicals law REACH is urgent to prevent consumer exposure to harmful chemicals including by enhancing enforcement at the EU’s borders and on online marketplaces.

### State of play

The Political Guidelines for the 2024-2029 European Commission announced a new Chemical Industry Package among others to simplify REACH. Preparatory work for the REACH revision is ongoing, with the Commission expected to present a legislative proposal during Q4 2025. On 2 July, the **EU Commission** might publish an omnibus proposal on chemicals, to simplify existing legislation such as the Classification, Packaging and Labelling Regulation. Ongoing preparatory work might impact the level of protection of consumers related to cosmetic products.

### Recommendations for the Presidency

We encourage the Danish presidency to launch Council discussions on the Commission’s proposal to revise REACH, with a view to swiftly reach a General Approach which will ensure progress in protecting consumers’ health and the environment. BEUC also calls on Member States to check very carefully the omnibus proposal on chemicals and potential changes to the cosmetic products regulation, and intervene should existing protection standards be lowered.

### What consumers need

- The REACH revision needs to simplify the REACH risk-management processes to enable faster, protective action against harmful chemicals such as PFAS (known as ‘forever chemicals’) before their use becomes widespread across society. This should be done by reducing the evidence needed to justify preventive action.
- Group restrictions for the most harmful chemicals such as carcinogens should be prioritised. Potential exemptions should only be considered for essential uses, i.e. those that are necessary for health and safety or that are critical for the functioning of society and where no acceptable alternatives exist.

- The Generic Risk Approach should be extended to endocrine disruptors and other chemicals of high concern. Legal implementation targets are needed to ensure that such chemicals are phased out from consumer products within a clear timeframe.
- An obligation to establish within the EU an economic operator responsible for compliance with REACH should be introduced. This will aid enforcement efforts against non-EU traders while also preventing situations where consumers become the de facto importer.
- The role and responsibilities of online marketplaces need to be adequately regulated with the possibility to hold them liable for non-compliant products if no other EU-based economic actor can be identified.

#### ADDITIONAL SOURCES

## 2

## Product safety

### Why it matters to consumers

Consumers today rely on written user manuals - provided for free with the product in their national language - for essential information on assembly, installation, maintenance, safe use, repair, energy consumption, and proper end-of-life treatment. While many consumers also use digital sources, eliminating the full paper manual and keeping only basic safety information can reduce consumer protection, as users may not scan digital codes to access key guidance. This may harm their economic interests and the environment, for example, if products fail early due to improper use or maintenance, consume excess energy, or are not repaired or correctly discarded.

## State of play

The **European Commission** proposed in its fourth omnibus in May 2025 for all products in the scope of the New Legislative Framework that manufacturers no longer need to provide a full user manual but only essential safety instructions. Consumers can ask within six months after purchase for a paper-based copy of the manual free of charge.

## Recommendations for the Presidency

Consumers have a right to be informed, and manufacturers who market products in the EU must provide such information upfront without putting hurdles for consumers to access this information. While many consumers today have internet access, digital information should only be provided in addition, not as a replacement to complete paper-based manuals. Additional digital information can, for example, concern videos which demonstrate assembly and safe use.

Policymakers should investigate the ‘competitiveness’ argument very carefully as consumer groups assume that manufacturers’ savings related to printed manuals will not be passed on to consumers by making appliances cheaper. Likewise, it will not make consumers’ lives simpler.

## What consumers need

- Access to the full user manual should include information about assembly, installation, maintenance, safe use, repair, energy consumption, spare parts, correct usage of different modes, and proper end-of-life treatment. Consumers need, for example, to be informed about how to use the right washing machine programme which is energy efficient and protects clothes and how to set the right temperature on their fridge. While this is not safety information, it is essential to use the appliance properly and durably.
- Consumers should not be tasked with asking for a user manual. Instead, manufacturers must be legally obliged to provide this information upfront as a precondition to be able to market products legally in the EU single market.

### ADDITIONAL SOURCES



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# SUSTAINABILITY

## 1

## Substantiating green claims

### Why it matters to consumers

Consumers' growing interest in making sustainable purchases has led to a rise in green claims and labels, which are not always reliable or accurate. With three out of four products carrying an environmental claim, the confusion and lack of trust concerning environmental information among Europeans is a real barrier to the green transition. As 53% of green claims are based on vague, misleading or unfounded information, 61% of EU consumers find it hard to tell which products are truly green. To prevent greenwashing, information displayed on products must be reliable, comparable and verifiable.

### State of play

In March 2023, the **European Commission** published its proposal for a Directive on Green Claims. While the proposal should ensure that labels are robust and trustworthy, we are concerned that it further limits environmental labelling schemes which can benefit consumers. On 12 March 2024, the **European Parliament** adopted its position bringing improvements to the text in line with BEUC recommendations. The **Council** adopted its general approach in June 2024. Trilogue negotiations started in January 2025, with the aim to conclude them within the Polish Presidency. Technical work will in any case continue during the Danish Presidency, which should also ensure the adoption of the Directive.

### Recommendations for the Presidency

BEUC calls on the Danish Presidency to reach an agreement on the proposed Directive on Green Claims – which BEUC supports but considers needs significant improvements – and to ensure coherence with the Empowering the Consumers for the Green Transition Directive. Both pieces of legislation must, in combination, guarantee that green claims and labels are robust and trustworthy. The Council should preserve the ambition of the Commission's proposal and further improve it.

### What consumers need

- The requirements for substantiating and communicating green claims should be developed with balanced participation of Member State representatives and relevant stakeholders, including consumer organisations, through a dedicated consultation forum.
- Green claims should be transparent and reflect the real environmental impact of products and traders, without hiding it or giving the impression that it is minimised or compensated through financial contributions to external projects like in carbon neutral claims.

- Green claims must be backed by robust evidence building on the principle of ‘no data, no claim’. Companies must be transparent - publicly disclosing the evidence substantiating their claims and having the claims verified before making them.
- Trustworthy labels should be reinforced to increase consumer access to eco-labelled products. The verification procedures for claims and labelling schemes should be swift enough to ensure the organisations in charge of trustworthy labels are not forced to discontinue them.
- The Directive should ensure environmental labels are trustworthy and reliable, while not restricting the development of those which bring added value. Notably, environmental labels based on aggregated indicators of environmental impacts or aspects, as well as new labels developed by Member States should not be prohibited, provided they are based on robust assessment methods and independent governance.
- Enforcement processes and penalties must be sufficiently strong to dissuade companies from making unsubstantiated claims.

#### ADDITIONAL SOURCES



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**END**

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- AB Qendra Konsumatori shqiptar
- 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
- EL EKPIZO
- EL KEPKA
- ES Asufin
- ES Confederación de consumidores y usuarios (CECU)
- ES Organización de consumidores y usuarios (OCU)
- FI Kuluttajaliitto ry
- FR Consommation, logement et cadre de vie (CLCV)
- FR UFC-Que Choisir
- HR Unija potrosaca Hrvatske
- HU Fogasztóvédelmi 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 ACR Malta
- NL Consumentenbond
- NO Forbrukerrådet
- PL Federacja Konsumentów
- PL Fundacja Konsumentów
- PT DECO
- RO Asociația Pro Consumatori
- 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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