


Position paper

BEUC input to first GDPR Implementation Dialogue

July 2025



Published | 18 July 2025

Contact | digital@beuc.eu

Reference | BEUC-X-2025-069

Document coordinator | Fernando Hortal Foronda

Credit | Photo by Kindel Media from Pexels

BEUC, The European Consumer Organisation

Bureau Européen des Unions de Consommateurs AISBL | Der Europäische Verbraucherverband

Rue d'Arlon 80, B-1040 Brussels • Tel. +32 (0)2 743 15 90 • www.beuc.eu

EC register for interest representatives: identification number 9505781573-45



Co-funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or EISMEA. Neither the European Union nor the granting authority can be held responsible for them.

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. Achieving the green and digital transitions while securing Europe’s place in an increasingly unstable geopolitical environment necessitates supportive, predictable EU rules. This fact is regrettably too often ignored by some which claim legislation is 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 in a cost-of-living crisis is neglected. The simplification agenda must avoid this misguided notion of EU legislation and be based on a broad societal approach (see [our letter](#)).

In the area of digitalisation and the protection of personal data and privacy, the EU must stick to its core values, i.e. protecting people’s fundamental rights and freedoms, democracy and ensuring the rule of law.

With regard to the General Data Protection Regulation (GDPR), [BEUC recommends](#) that the Commission and Member States focus on improving its implementation and enforcement. This is in line with the view of the majority of stakeholders, the [Competitiveness Compass](#) and the [Commission’s](#), the [Council’s](#) and the [European Data Protection Board \(EDPB\)’s](#) own assessments. Re-opening the regulation would create legal uncertainty for all stakeholders and additional compliance costs for companies who have already invested in implementing the GDPR requirements. Moreover, the GDPR is a cornerstone for other regulations and laws and introducing changes to the GDPR would risk complicating rather than simplifying the legal landscape.

The GDPR is a success story, and a carefully drafted compromise which emerged from a democratic negotiation process. There is no empirical evidence that data protection hampers innovation. The GDPR is a foundation for a strong digital economy, not an obstacle, as it improves consumers’ trust and confidence, which is a precondition of a flourishing digital economy.

BEUC supports further measures to accompany small companies’ compliance such as tailored guidance, more awareness rising campaigns or capacity building training for SMEs and structured dialogues with data protections authorities (DPAs). In addition, we would like the Commission to propose a digital enforcement strategy to reduce barriers to justice for consumers, to foster cooperation between DPAs and other competent authorities and to level the playing field between those who comply and those that disregard the law.

It is of utmost importance, that all companies, irrespective of their size are compliant with EU legislation. Exempting different groups of companies from obligations simply because of their size or risk as proposed in the 4th omnibus proposal is of concern.

The digitalisation of people’s daily lives will progress with high speed. For this reason, it is of utmost importance that the EU legislator keeps the level of personal data protection high, does not question the primary objectives of the GDPR which provides for a balance of interests, and continues to close loopholes in the regulatory toolbox, such as developing an ambitious Digital Fairness Act.

The EU must continue to play a lead role on a global scale to set standards for digital governance and the protection of fundamental rights which requires an active role to set ambitious objectives which are strictly applied and enforced.