

Position paper

BEUC's view on the Consumer Agenda 2025-2030

August 2025

Why it matters to consumers

In the last years, consumers came across many new challenges from the COVID pandemic, war in Ukraine to the persistent cost-of-living crisis. As a result, their purchasing power and market behaviours have changed significantly. Today, more than ever, they need strong consumer protection legislation and its effective roll out and enforcement to fully benefit from the Single Market. Those are the prerequisites for more consumer trust, without which an improved EU competitiveness cannot become a reality. The upcoming Consumer Agenda will set a vision for the EU consumer policy for the next five years and will directly impact any developments in this area that have a potential to deliver to consumers.

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1. Introduction

Consumer policy has a very important role to play in the EU. It is essential for boosting EU competitiveness and well-functioning markets. It does not only protect the people, but also raises the level of consumer trust, creates incentives to increase consumer product quality, empowers consumers with information, more choice, and encourages innovation and a more sustainable economy.

Moreover, consumer policy can bring tangible changes for consumers and is important across all sectors since the integration principle - enshrined in the Treaty on the Functioning of the European Union - ensures that consumer protection considerations are integrated into all relevant EU policies. Policymakers should prioritise consumer policy, bearing in mind that any diminishing of well-established rights can

lead to reducing consumer trust and hamper EU competitiveness as a result.

The Consumer Agenda 2025-2030 will put forward priorities and key actions the European Commission commits to take together with Member States and the European Parliament during this period.

This paper outlines BEUC's main recommendations for this upcoming strategic document and for the years to come. It addresses all key priorities identified by the European Commission in its open public consultation questionnaire and makes suggestions in other areas such as mobility and passenger rights, energy, health, safe products, food systems, water consumption and housing.

2. Administrative burden and simplification

Focus areas for consumers

The current EU competitiveness agenda calls for administrative burden reductions and simplification of EU rules for businesses. While we agree that this can be a legitimate effort, we would like to underline that **simplification should not mean deregulation**. These initiatives should never undermine the important consumer policy objectives and core consumer rights. This is why, we advise an utmost caution in this area. For example, in the area of the consumer rights, the regulatory burden on business is modest¹ but the implications of introducing changes to well-established consumer rights can be major, reducing the

level of consumer protection and leading to a much higher consumer detriment.

In addition, we are worried about the current tendency to see the EU legislation as burdensome, unnecessary or even illegitimate, whereas its important role to protect people and make their life easier is being neglected. Strong consumer protection and smart regulation often create new markets, increase trust between consumers and businesses in the Single Market, which is crucial for household consumption, thereby fostering innovation and strengthening the EU's competitiveness. In BEUC's view, any

¹ Commission Staff Working Document, Fitness Check of EU consumer law on digital fairness, SWD(2024) 230 final.

simplification efforts should deliver visible improvements for consumers², for example (1) by introducing clearer and more explicit provisions that would improve legal certainty for consumers, businesses, public authorities and the courts, (2) by improving the implementation and enforcement of laws adopted in the last years, (3) ensuring a proper alignment between already existing

terms, definitions and consequences of the regulation and finally (4) considering whether EU simplification goals could be reached by introducing standardised templates.³ Instead of risking opening consumer acquis to simplify the letter of the law, simplification measures can also include soft law initiatives, such as guidelines unless those have previously proved ineffective.

Actions we recommend

- **Any simplification initiatives should not undermine core policy objectives or lower consumer protection levels.** They should also be processed in compliance with Better Regulation principles⁴ and a proper **stakeholder** engagement.
- **Clearly state in the Consumer Agenda that if any simplification measures are introduced, they should benefit consumers.** This can be done by easing the exercise and enforceability of their rights as well as through the introduction of new protections, as outlined in the following sections.

3. Strengthening consumer protection in the online environment

Focus areas for consumers

Consumers are spending more and more time and money online: shopping, playing video games, using social media, booking tickets, etc. While digitalisation has brought many benefits for consumers, it has also given rise to harmful commercial practices, such as dark patterns, addictive design, influencer marketing and unfair personalisation. According to the Digital Fairness Fitness Check report,⁵ unfair commercial practices

amount to an annual financial consumer harm of €7.9 billion because EU consumer law does not sufficiently address the challenges that consumers face online. They also lead to over-consumption, obfuscated prices and weakening of perceived consumer rights and can be a source of mental harm, such as anxiety or depression. However, since the purpose of EU consumer law is currently limited to protecting the economic

² For more information see [BEUC letter to Commissioner Dombrovskis](#) from 5 May 2025, entitled “The simplification agenda must deliver to consumers”

³ Standardised templates could be especially beneficial in regard to legal documents and procedures imposed on consumers and businesses. e.g. it is mandatory for businesses selling goods and services to consumers online to provide the consumer with a contract, cookie policies etc. and hence businesses must use significant resources on writing, updating and checking these documents. At the same time the consumer is forced to read through new, different and potentially illegal documents every time they visit a website, purchase goods or services online etc. An EU-standardised templates of these types of contracts would benefit both businesses and consumers by making sure that these legal documents are similar and in correspondence with the law. A great example is the right to withdraw form that must be provided to consumers when a purchase is made online.

⁴ https://commission.europa.eu/law/law-making-process/better-regulation_en#what-is-better-regulation

⁵ Commission Staff Working Document Fitness Check of EU consumer law on digital fairness (SWD(2024) 230 final).

interests of consumers,⁶ it does not allow consumers to claim compensation for such mental harm. The Digital Fairness Act should thus extend the purpose of EU consumer law to include protection against material and immaterial harm.

Moreover, while the recently adopted digital laws (including the Digital Services Act) contributed to an improvement of the consumer protection, they also have limitations due to their scope. As such, they **need to be complemented by a strong Digital Fairness Act, reducing risks of overlaps and ensuring that consumer law acquis can effectively play its role as a safety net.**

It is also important that consumers can make use of the digital economy while their rights and protections are not being undermined. Most consumers do not want to be tracked. Only 16% of consumers approve of tracking walls, personal data analysis and monetisation. For example, our UK member Which? found that users of connected devices are being asked to provide substantial amounts of data to manufacturers beyond what is needed for a product to function (e.g. a washing machine asking your age or a security camera sending data to TikTok).

Consumers should also be protected against discriminatory practices, unsafe artificial intelligence (AI) and other emerging and complex technologies i.e. where the possibility for consumers to get insight is limited. Almost half of Danish consumers (46,5%) don't trust themselves to correctly identify if AI is incorporated in the apps and services they use, and 40% cannot

identify whether a given task is performed by a human or an AI. Almost six in ten people (59%) find it unfair for apps and websites to use AI to trigger strong emotional responses from users, such as fear or anger. Only 15% of people consider this practice to be fair.

In the last two years, **92% of consumers were exposed to fraud and scams online**, 16% of which suffered financial losses according to a consumer survey conducted by Euroconsumers in Belgium, Italy, Spain and Portugal.⁷ Currently 86% of losses are paid by consumers in case of fraudulent credit transfers.⁸ While individual consumers can do little to protect themselves against increasingly sophisticated fraud and scams often conducted by international organised crime syndicates, banks, online platforms and electronic communication providers should have to effectively prevent fraud from happening and fairly reimburse consumers in case of fraud.

Achieving the digital transition while securing Europe's place in an increasingly unstable geopolitical environment requires supportive, predictable EU rules. Once again, if simplification measures are introduced, they should focus on improving consumers' lives, in a form of clearer rules or more streamlined enforcement, which would also ensure a better level playing field for the businesses. However, the **EU cannot go backwards on consumer protection**, e.g. by rescinding existing consumer rights or weakening the level of consumer protection, reopening the GDPR or laws that are not even applicable yet, like the AI Act.

⁶ See for instance Article 1 UCPD.

⁷ Euroconsumers, Caught in the web: Navigating the digital maze of scams ([LINK](#)).

⁸ European Banking Authority & European Central Bank: 2024 Report on payment fraud ([LINK](#))

Actions we recommend

- **An ambitious Digital Fairness Act**, updating EU consumer acquis to better protect consumers online, by introducing the principle of fairness by design and by default, clarifying the rules on harmful commercial practices such as dark patterns, addictive design, influencer marketing, unfair personalisation and unfair practices in video games and adjusting the burden of proof to facilitate enforcement.
- **The EU should improve the EU digital rulebook's implementation and enforcement**, including the General Data Protection Regulation (GDPR), Digital Services Act, Digital Markets Act and the AI Act.
- **Strong enforcement of the Payment Services Regulation** (once adopted) and the **Digital Services Act**. Introduce additional fraud prevention obligations and liabilities for electronic communication providers, online platforms and search engines if the existing framework proves ineffective in preventing online fraud. Moreover, encourage Member States to introduce strong support services and rights for fraud victims, especially those who are left with severe financial consequences.

4. Protecting vulnerable consumers

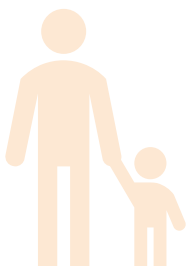
Focus areas for consumers

Vulnerable consumers need a higher level of protection, that can address different obstacles they are facing, due to their age, disability or as a result of the digital vulnerability that can apply to all. This category should include individuals who find themselves in a special situation of subordination,

defencelessness, or lack of protection, whether territorially, sectorally, or temporarily, that prevents them from exercising their rights as consumers on equal terms. This can be due to their characteristics, needs, or personal, economic, educational, or social circumstances.

The upcoming Consumer Agenda should pay particular attention to the following areas:

Minors' protection

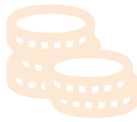


In the EU, 97% of young people⁹ use the internet daily, primarily for social networking, yet they are insufficiently safe online.¹⁰ While the internet serves as a platform for socialising, community-building and self-expression, **children are highly vulnerable to privacy-invasive, addictive and manipulative designs** which are usually driven by commercial practices. With growing evidence of the detrimental effects on both adults and children's mental health and development, it is primordial for the EU to vigorously enforce its digital rulebook and tackle pending issues to protect children and adults alike in the digital sphere to create a safe environment by design and by default.

⁹ Eurostat, *Young-people – digital world*, 2025.

¹⁰ European Commission, *BIK+ strategy evaluation report*, 2025.

Limited access to financial services



Across Europe, disappearing bank branches and ATMs are leaving **many consumers without access to cash and basic financial services**. Where such services are still offered, they are significantly more expensive than online banking. Consumers need legislative initiatives to secure an effective access to basic financial services at a reasonable cost.

Moreover, **financial literacy across Europe remains at a low level¹¹** and the industry is the one currently and very often providing education and advice, with conflicting interests. Consumer organisations provide financial education and advice but often lack adequate funding to scale up their activities.

While for 62% of consumers, it is important that their investments do not fund activities which are harmful for the planet¹², they are **exposed to greenwashing when purchasing investment products** (e.g. funds, life insurances). While the name of the product includes the terms “sustainable” or “green”, very often the underlying investment portfolio includes companies expanding their fossil fuel activities or other harmful activities. Clear rules on fund names and underlying product categories are needed to prevent greenwashing.

Shift to digital labelling



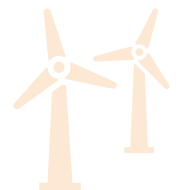
While businesses increasingly rely on digital tools to inform consumers, EU laws do not sufficiently support nor regulate the use of these tools. This lack of adequate rules might increase risks that consumers are exposed to misleading or unfair commercial practices. EU legislation needs to ensure that information provided through digital means is relevant, reliable, and accurate.

Digital tools evidently cannot fully replace on-pack labels or paper leaflets as it would undermine, rather than enable, informed consumer choices¹³, e.g. by making access to information more time-consuming and burdensome or by outright excluding some consumers from information essential to their health and well-being.

On the other hand, digital tools should play an important complementary role by improving legibility for visually impaired consumers or by helping to translate mandatory on-pack information to useful advice for instance. It is therefore important to ensure their correct implementation, e.g. by ensuring that these tools provide information in a consumer-friendly way.

Energy transition

The gas phase-out will bring significant transitional challenges for consumers. As the number of gas network users declines, the cost burden on gas consumers is likely to increase. Many households - in particular vulnerable and low-income households – will not be able to switch immediately to cleaner heating solutions. These consumers risk paying more, as the costs for the same infrastructure are likely to be spread among fewer users.



¹¹ Eurobarometer: Monitoring the level of financial literacy in the EU (LINK).

¹² Eurobarometer: Retail Financial Services and Products (LINK)

¹³ For more information see: https://www.beuc.eu/sites/default/files/publications/beuc-x-2021-016_why_moving_essential_product_information_online_is_a_no-go.pdf

Actions we recommend

- **Strengthen the legal framework on online protection, including for minors**, e.g. through the Digital Fairness Act, addressing manipulative and addictive design, influencer marketing for unhealthy or unsuitable products and services, targeted advertising and unfair commercial practices in video games, with the aim of making the internet safe by design and by default. Better rights for all will increase minors' protection as a result.
- **Support the adoption of the legislative proposal on access and acceptance of cash and review the Payment Account Directive** to introduce measures limiting the costs of basic payment accounts and basic payment services offered in bank branches.
- **Secure sufficient funding for consumer organisations** to provide financial education and independent advice to consumers.
- **Revise the Sustainable Finance Disclosure Regulation** and ensure that disclosures are based on solid evidence from the market.
- **During the phase out of gas**, limit the financial burden and prevent disproportionate impacts on consumers.

5. Enforcement of consumer protection rules and e-commerce

Focus areas for consumers

Nowadays the enforcement of consumer protection rules faces an increasing number of obstacles both at the EU and national levels. Among other things, this is because of:

- **The nature and speed of infringements:** when happening in the digital space, breaches are difficult to detect and/or may take place during short periods of time while still infringing the rights of millions of consumers. Furthermore, infringements are increasingly cross-cutting and not only relevant from a consumer protection perspective, but also from competition, safety and data protection perspectives. This requires coordination and consistency between several laws, objectives, legal interpretations and enforcement approaches, which may not always be aligned or may pursue different goals.
- **The identity and location of traders:** some non-EU traders target EU consumers without complying with European rules. Other traders may treat consumers differently based on consumers countries of residence.
- **Insufficient deterrence:** the European network of consumer protection authorities (CPC-Network) relies on dialogue with traders, but this may not be sufficient when traders refuse to comply or to change their marketing practices. In addition, in cases where infringements are very widespread across the whole sector, starting a dialogue with every single company is simply not possible and authorities should be able to use deterrent

finances instead, to ensure that all companies using similar practices change their behaviour to comply with the law.

- **Lack of capacity and resources:** enforcers remain under-resourced and may lack capacity for carrying out their work. They may not have the digital tools to monitor market patterns and detect systemic issues.
- **Difficulties linked to access to evidence and burden of proof:** for many infringements, access to evidence remains an issue for enforcers, consumers as well as for consumer organisations representing consumers, and requires additional costly in-depth market research.
- **Insufficient cooperation:** Works and activities of stakeholders involved in the enforcement of consumer rights are still too often carried out in silos, for example due to the confidentiality rules that also apply to the exchanges among the authorities, whereas synergies and exchanges could be mutually beneficial and strengthen enforcement.
- **Procedural obstacles for cross-border collective actions:** Private international law rules were adopted long before the EU framework on representative actions. Unfortunately, these rules now often act as a barrier to cross-border representative actions to redress. For example, if a legal action is brought to another country than the one where harmed consumers are domiciled, the court may require a legal study of substantial law. Such a study would be applicable to the alleged infringement and the damage suffered by consumers. It would not only significantly increase litigation costs but would also delay proceedings.

Finally, **consumers need better protection from unsafe products**. Purchases on online marketplaces come with a risk, as ample evidence from consumer groups research and testing demonstrates¹⁴. Modernising the **Market Surveillance Regulation** from 2019 is urgent. Currently, the concept of an ‘authorised representative’ does not work and the liability of online marketplaces in case no one else takes responsibility is not sufficiently regulated.

Actions we recommend

- **Revise the Consumer Protection Cooperation (CPC) Regulation.** This revision should among other things:
 - Upgrade the coordination between national CPC authorities to make CPC proceedings more deterrents and give the European Commission a role to address infringements with an EU-wide dimension. Its independence and ensuring it has sufficient resources when acting as the lead investigator and/or lead enforcer is key.
 - Ensure coordination and consistency between enforcement authorities operating in various sectors (such as competition, digital, consumer, safety, etc.)
 - Ensure that consumer organisations and other entities eligible to submit CPC external alerts can benefit from procedural rights during CPC proceedings. It

¹⁴ https://www.beuc.eu/sites/default/files/publications/unsafe_and_illegal_activities_online.pdf

should include a right to be heard during proceedings, take part in subsequent discussions with traders and be consulted on commitments proposed by traders.

- **Ensure an effective implementation of the Directive on Representative Actions** and alleviate procedural obstacles. This includes:
 - Adapting EU private international law provisions, so that they are not a barrier to cross-border representative actions for redress¹⁵.
 - Including a new provision on applicable law in cross-border collective redress cases, to the upcoming Digital Fairness Act¹⁶.
 - Ensuring assistance and funding for qualified entities (see also section 7).
- **Ensure a reversal of the burden of proof** so that in some situations it can be shifted to traders and facilitate access to evidence that they hold.
- **Ensure coordination between public enforcement (CPC Regulation), private enforcement (representative actions) and consumer Alternative Dispute Resolution (ADR)/Online Dispute Resolution (ODR).** Among others, decisions taken by public authorities should facilitate follow-actions seeking damages. Consumer ADR/ODR entities can also strengthen the work of consumer protection authorities by alerting about new market patterns.
- **Ensure that consumer ADR/ODR delivers for consumers** in Europe, by introducing a mandatory participation of traders, especially in sectors yielding a high number of consumer complaints (e.g. tourism and transport).
- **Adopt a Digital Enforcement Strategy** to address the many barriers consumers face to get redress in digital markets and streamline enforcement cooperation between authorities. In some cases, different enforcement authorities are conducting investigations against the same trader and even regarding the same practices, without the possibility to share information between them due to confidentiality reasons and without a framework to cooperate under to be shielded from procedural challenges.
- **Revise the Market Surveillance Regulation** to ensure that online marketplaces are defined as 'economic operators' and ensure that someone is always liable for product safety within the EU for all products.
- **Establish an EU Market Surveillance Authority** to create a coherent pan-European system of market surveillance which can provide for a high and even level of consumer protection, fair market conditions, and allow for better coordination on EU level with other enforcement authorities.

¹⁵ BEUC-X-2025-067, BEUC position paper: « Upgrading EU Private International Law for effective collective redress »

¹⁶ Idem

6. Governance and stakeholder cooperation

Focus areas for consumers

Consumer groups are an important link between individual citizens and policymakers as they have first-hand knowledge and independent evidence about people's daily concerns and expectations on markets and regulators. Consumer organisations act as an early warning signpost on what goes wrong in markets. They flag missing enforcement of EU legislation and provide information such as consumer complaints and results from market research and testing which can inform both national and EU policymaking. Involving those who are affected by legislation can improve informed decision-making, which the OECD Regulatory Outlook 2025¹⁷ pointed out.

Moreover, consumer organisations inform and support consumers in their everyday economic decisions and about their rights. They thereby have a crucial role in protecting them. This in turn contributes to the overall functioning and efficiency of consumer policy and the Single Market, and reduces the burden for authorities. They also defend consumers' rights in courts and before authorities, including through representative actions, contributing to a level playing field for businesses.

As the space for civil society in Europe must be preserved to protect European democratic values, it is crucial that the EU carefully links the Consumer Agenda to its upcoming EU Civil Society Strategy.

Moreover, to better protect consumers, it is crucial that both consumer organisations and public authorities have sufficient resources to have a good level of engagement and cooperate well both at national and international level. Unfortunately, today, many consumer organisations must operate under very limited budgets which makes it challenging to effectively fulfil their role – including to help consumer with enforcing their rights or represent them in the policy discussions – and creates big discrepancies across the EU in the civil society landscape.

It has been a long-standing BEUC recommendation¹⁸ to ensure Member States support national consumer organisations and ensure their financial stability by redirecting to them some of the public fines national authorities imposed for the infringements of the EU consumer protection legislation, digital laws (such as the DSA or the DMA) or competition law. Such a model is already being used for instance in Italy, Quebec and Brazil¹⁹. In Italy's case, the law²⁰ allocates a portion of funds from antitrust fines to “initiatives benefiting consumers” leaving it to the relevant Minister's discretion to decide the exact allocation. The 2022 ministerial decree defining available funds for the 2022-2024 period allocated €15 million euros directly to consumer associations. Such a solution allows to mitigate the harm caused by these infringements to the general consumer interest.

¹⁷ OECD Regulatory Outlook 2025, https://www.oecd.org/en/publications/oecd-regulatory-policy-outlook-2025_56b60e39-en/full-report/regulating-for-people_6d2fc8d4.html#chapter-d1e2044-036752c453.

¹⁸ See for example BEUC's paper from 2012 on this topic: <https://www.beuc.eu/sites/default/files/publications/2012-00561-01-e.pdf>

¹⁹ For more information see the study “[Funding of collective redress - Financing options in the EU and beyond](#)” (p. 17-19).

²⁰ Article n.148 of the 2000 State Budget Law n.388 of 23 December 2000

On the other hand, the globalisation of the Single Market creates hurdles for European authorities to ensure that third country traders comply with EU law. Other countries outside of Europe are facing a similar challenge, very often with the same traders.

By cooperating with third countries, EU authorities could save resources and maximise their impacts to better protect consumers. This is particularly important in the field of consumer law enforcement and product safety.

Actions we recommend

- **Ensure good governance by including consumers' views in consultations and decision-making processes.** We need a sound and transparent governance framework for decision making processes which balances the different interests at stake and provides a proper space for consumer organisations and civil society to engage with policymakers.
- **Encourage Member States to create public funds at national level to support civil society organisations activities** in consumer protection, using one or more of the following financing models: allocation of fines; allocation of unclaimed amounts in collective redress cases; and/or return of a share of successful claims. The creation of such funds would support the objective of the Representative Actions Directive (RAD) to improve consumers' access to justice and would align with the obligation of Member States under Article 20 to take measures ensuring that the high costs associated with representative actions do not prevent consumer organisations from seeking redress for consumers who have suffered harm.
- **Develop international cooperation partnerships** to share information about enforcement investigations and coordinate remedies. For example, the CPC-Network could cooperate with the UK Competition and Markets Authority. The European Commission's Directorate-General for Justice and Consumers (DG JUST) could also replicate the good precedent of the Memorandum of Understanding²¹ between the EU and Canada on market surveillance with other partners, and conduct joint market sweeps to better protect consumers from dangerous products.

7. Sustainable consumption

Focus area for consumers

Studies continuously show that consumers strongly wish to feel reassured that their consumption is responsible, and they increasingly seek to integrate more sustainable practices in their daily choices. Yet, this remains difficult in practice. Access

to sustainable products and services is paramount for consumers to engage in the green transition. For this to happen, consumers should have access to clear information about the products they buy in a safe and protecting (online) environment.

²¹ <https://www.international.gc.ca/trade-commerce/trade-agreements-accords-commerciaux/agr->

acc/european_community-communaute_europeenne/mra/index.aspx?lang=eng

Digital tools such as product passports, open environmental data, and transparent online interfaces can play a crucial role in guiding consumers towards more sustainable decisions. Rules facilitating repair and promoting longer-lasting, environmentally-friendly products are also necessary, alongside price signals that make sustainable options more attractive, so sustainable choices become the norm.

The proliferation of misleading green claims leads to consumer confusion and a lack of trust in environmental information, which the 2025 Consumer Conditions Scoreboard²² showed. A growing lack of confidence in green claims reliability is discouraging sustainable purchases, to the detriment of both consumers and responsible businesses, whose efforts are being undermined by rogue traders flooding the market with unsubstantiated and false claims. EU legislation and its enforcement should ensure that consumers can trust that what is marketed as ‘green’ or ‘sustainable’ is truly so.

Consumers are also disempowered in the green transition by unfair practices in digital environments such as dark patterns. A recent [BEUC report Click to buy \(more\)](#), showed how the use of such practices by fast fashion companies directly fuels overconsumption by creating consumer

addictions and taking away consumer control over their purchasing behaviour, leading them not only to unsustainable choices but also to important financial harms.

Moreover, examples of applied circular economy practices – like repair centres, lending libraries, or makerspaces - are currently often based on private commitment by dedicated individuals. These consumer-driven circular economy initiatives are important, but the EU and Member States should do more to provide the resources and infrastructure needed for consumers to be able to take circular actions in their daily lives.

Finally, as the EU’s second Emission Trading System (ETS2) is set to enter into force in 2027, the bloc and Member States need to support the most vulnerable households who are stuck with fossil-fuelled cars and heating systems. Helping them switch to sustainable alternatives should be at the heart of Social Climate Plans. On top of direct support to these households, setting up new schemes to support the purchase or use of clean technologies will directly support the EU industry’s competitiveness and accelerate the transition to a low-carbon, sustainable economy that benefits both consumers and businesses.

Actions we recommend

- **Accelerate the adoption and expand the scope of Ecodesign rules** so that only products meeting minimum sustainability requirements reach the market and enable the right to repair, since the Right to Repair Directive foresees obligations for products that already have repair requirements under Ecodesign only.
- **Ensure the adoption and implementation of EU legislation, setting clear rules for traders’ substantiation and communication of voluntary environmental claims**, e.g., through the proposed Green Claims Directive to complement existing rules on empowering consumers to the green transition.

²² https://commission.europa.eu/strategy-and-policy/policies/consumers/consumer-protection-policy/key-consumer-data_en

- **Support the correct transposition and implementation of new consumer law instruments adopted to foster more sustainable consumption**, namely the Right to Repair Directive and the Directive on Empowering Consumers for the Green Transition.
- **Support market uptake and consumer awareness of the EU Ecolabel**, including by expanding the scheme's portfolio to new categories of goods and services which can boost sustainable and circular consumption (e.g. leasing, remanufacturing, sharing, etc). Reinforce communication actions and partnerships with relevant stakeholders, such as consumer organisations and retailers both at European and national level.
- **Protect consumers against greenwashing and ensure that only trusted labels, such as the EU Ecolabel and trusted private labels (like the ones from consumer organisations), and reliable green claims are displayed on products.** The Commission should ensure a swift application of the provisions Directive Empowering Consumers for the Green Transition addressing misleading green claims and labels, including by providing clear guidance to companies and supporting robust enforcement from consumer protection authorities.
- **Address detrimental practises on online marketplaces** and business models contributing to marketing and (over)consumption of unsustainable products.
- **Encourage Member States to develop a political strategy to expand infrastructure and measures to implement the circular economy** (based on the overarching goals of reduce, reuse, and repair) into consumers' daily lives, including (financial) support programs for consumer initiatives and expansion and integration of lending and exchange possibilities into municipal infrastructure (e.g. based on public libraries).
- **Accompany and strictly supervise the implementation of Social Climate Plans** to make sure the cost of ETS2 is bearable for lower-income consumers and that they have access to sustainable alternatives (see sections 9.1 and 9.2).
- **Ensure that the upcoming Circular Economy Act goes beyond recycling.** It should give equal priority to business models for direct reuse that benefit consumers and strengthen European competitiveness by delivering energy savings, job creation, resource efficiency and higher economic value. In line with the waste hierarchy, consumers' access to sustainable products and services should prioritise prevention, reuse and repair before recycling, to maximise environmental benefits and reduce waste.

8. Completing the EU Single Market for consumers

Focus areas for consumers

The Single Market is one of the EU's greatest achievements. For consumers, it provides a wider choice of goods and services at a better value. However, many barriers still prevent consumers from fully benefiting from it.

These should be addressed by the upcoming Single Market Action Plan.

First, **consumers should have access to fair and competitive electronic communication markets.** Telecoms keep featuring high in the complaints BEUC members receive from consumers. What is more, there is a tendency for more market concentration in electronic communications across Member States. Competition law, the Open Internet Regulation and the European Electronic Communications Code foster competition and the protection of consumers and network neutrality. However, these objectives may be at risk in future telecoms regulation to be proposed before the end of 2025.

In addition, consumers often pay huge sums of money to speak to somebody in another country for the simple fact that **telecom operators can still apply excessive surcharges on intra-EU calls.** The actual cost for these companies to connect these calls is minimal and continues to fall, so the EU decided to prohibit intra-EU communications' surcharges but only as of 2029, which will however only be possible if the respective implementing rules are in place.

Secondly, consumers should be able to access digital content and services from providers across borders. Now, much too often they are blocked from watching TV shows, sports and films online from abroad. This is because companies 'geo-block' their services and offers based on where the person lives or their nationality. This is why **it is crucial to end geo-blocking of audiovisual content** to complete the digital single market, reduce piracy and benefit from cultural diversity in the EU.

Furthermore, **consumers should be able to benefit from a European Savings and Investment Union with retail investment**

products available across borders. The current inducement-based distribution system incentivises bank salespersons to sell their domestic products only, which often precludes cross-border competition, and competition on product quality in general. Fragmented supervision, diverging transpositions of EU law, deliberate national protectionism of incumbents, and differences in taxation, further undermine efforts to create a common capital market. The consequences of a fragmented capital market are two-fold: consumers do not have access to attractive investment products to save for their retirement; and European companies lack access to attractive financing mechanisms to invest and scale up innovative solutions.

Finally, **territorial supply constraints (TSC) remain a barrier to the Single Market.** They include refusing to supply or artificial packaging/labelling differences and manufacturers use them to segment markets. They result in situations where prices can vary significantly across EU countries. For example, according to our member Arbeiterkammer's study, identical food products prices are on average 21% more expensive in Austria than in Germany. These constraints can undermine a well-functioning Single Market, suppress competition, raise prices, and reduce choice. A Commission study²³ found that these constraints cost consumers €14 billion each year. This is particularly pertinent as the cost of living continues to be a key concern for many consumers. Food prices for example, have risen dramatically in recent years, remaining 40% higher on average than in early 2022²⁴. This is why we need to end territorial supply constraints and eradicate the additional substantial costs they create for consumers.

²³ European Commission: Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, LE Europe and VVA, Study on territorial supply constraints in the EU retail sector – Final report, Publications Office, 2020

²⁴ State of Food Security in the EU, A qualitative assessment of food supply and food security in the EU within the framework of the EFSCM, Autumn 2024, N° 3.

Actions we recommend

- **Adopt a Digital Networks Act and review the European Electronic Communications Code** to foster more competition, ensure a high level of consumer protection and net neutrality.
- Prioritise the adoption of implementing rules necessary to **end intra-EU communications' surcharges**.
- **Amend the Geo-blocking Regulation** to include audiovisual services in its scope.
- Ensure that the Savings and Investment Union delivers for consumers on product quality and access to retail investment products.
- To deal with territorial supply constraints, consider a broader legislative approach, going beyond reliance on case-by-case enforcement through competition law.

9. Actions needed in specific sectors

9.1. Mobility and passenger rights

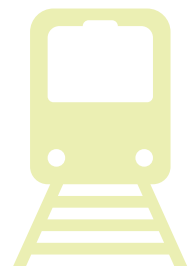
Focus areas for consumers

Mobility is at the crossroads of the climate and social transitions. With transport representing the third biggest pillar of EU household expenditure and 25% of the bloc's CO₂ emissions, access to sustainable transport modes is critical. For consumers, this means electric cars should become more affordable, with clear information passed on to consumers about their specificities. It also means that train and multimodal rides should become affordable and convenient for short-and long-distance trips and that travellers should be protected by strong, comprehensive and easily enforceable rights.

Sustainable transport methods should be also in the position where they can compete with other methods with regards to prices, availability and consumer rights. At the same

time, as more travel systems move towards self-service and digital-only interfaces, it is crucial to apply high standards of transparency, liability and consumer protection to these systems, so that passengers do not lose rights due to the complexity or lack of clarity of the systems they are required to use.

Greenwashing frequently occurs in the transport sector, with misleading “green” claims on tickets and services undermining consumer trust. Strong monitoring and enforcement are needed to ensure that environmental information is accurate and reliable.



Actions we recommend

- **Revise the Car Labelling Directive** and ensure that consumers can compare cars based on their environmental performance, e.g. with an eco-score.
- **Ensure price and payment transparency at public charging stations** to protect consumers when charging their electric cars and help them benefit from in-use savings.
- **Set up innovative schemes, such as social leasing and mobility budgets, to help consumers participate in the transition** through the Social Climate Plans.
- **Adopt new legislation to facilitate ticket booking**, particularly for trains.
- **Revise the Rail Passenger Rights Regulation** to provide stronger liability and protection for passengers buying through tickets²⁵, to diminish the number of national exemptions to ensure passenger rights apply to all railway services as a principle, and to address recurrent enforcement issues.
- **Revise the Air Services Regulation** to ensure consumers (1) benefit from clear rules on hand luggage allowance, (2) can access transparent information about airlines prices to better compare offers, irrelevant the booking channel, (3) are protected against airline insolvencies and (4) benefit from statutory cancellation rights.

9.2. Energy

Focus areas for consumers

Our energy system is currently going through a shift of seismic magnitude with strong consequences for consumers. The energy transition from a fossil fuels-based energy system to one building mostly on renewable energy sources requires wide-ranging adjustments in the way we consume energy.

While surveys show EU citizens are generally very supportive of the transition, they also

reveal that the first expectation consumers have towards EU energy policy is to “ensure affordable energy prices”. The share of consumers mentioning affordability as the number one priority has grown significantly compared to five years ago, which is understandable given the price increases experienced during the energy crisis.



Actions we recommend

- **Consumer rights**, such as access to comparison tools and clear requirements for (pre-)contractual and billing information, **need to be clarified and strengthened** (e.g. by introducing standardised templates for energy contracts and bills).

²⁵ ‘through ticket’ means a ticket or tickets representing a transport contract for successive railway services operated by one or more railway undertakings

- **Better financing models should exist** to help consumers to participate in the transition. (e.g. the economic attractiveness of green loans and mortgages must be improved; procedures to claim subsidies should be less bureaucratic and quicker).
- **Price signals should also be corrected** to favour green technologies (e.g. taxes and levies on electricity should be reduced).
- **Consumers should not shoulder a disproportionate share of the costs** of the expansion of electricity grids.
- **Consumers should benefit from new types of energy offers** (flexibility offers, energy sharing, energy communities) **and renewable-based heating and cooling** (heat pumps and district heating) while guaranteeing a high level of consumer protection for these offers.

9.3. Health

Focus areas for consumers

Medicine shortages have become a common public health problem across the EU. Consumer surveys show that in about half of the cases, the shortage had an impact on people's health.²⁶ The high price of many new medicines is another barrier to access,

undermining public health systems and consumers' capacity to afford them. Greater cooperation and EU action is needed to address these gaps, which become even wider during a health crisis.



Actions we recommend

- The European Commission must continue promoting cooperation amongst Member States to improve the availability and affordability of medicines. For example, by facilitating joint procurement and information-sharing on medicine pricing and reimbursement.
- **The revised EU pharmaceutical legislation must ensure that there is a greater focus on the prevention of medicine shortages.** This can be achieved by mandating companies to develop shortage prevention plans. In addition, the legislation should reinforce generic competition.
- **The Critical Medicines Act must contribute to more diversified supply chains for medicines,** and to maximise public return on public investment if companies receive financial support to enhance their production capacity in Europe.
- **The Health Emergency Preparedness and Response Authority (HERA) should have more resources** to contribute more effectively to timely consumer access to vaccines and other essential health products during a crisis.

²⁶ <https://www.euroconsumers.org/wp-content/uploads/2024/07/Drug-shortages-survey-report-2.pdf>

9.4. Safe products

Focus areas for 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 goods²⁷. In May 2023, seven BEUC members found²⁸ that 60% of 121 tested toys and children’s products contained one or more hormone-disrupting chemicals, including

some that are illegal. A reform of the main EU chemicals law, the Registration, Evaluation, Authorisation and Restriction of Chemicals Regulation (REACH) is urgent to prevent consumer exposure to harmful chemicals including by enhancing enforcement at the EU’s borders and on online marketplaces.



Actions we recommend

- **The upcoming REACH revision should enable authorities to take faster protective action against harmful chemicals** before their use becomes widespread across society while also regulating the role and responsibilities of online marketplaces²⁹.
- Furthermore, the REACH revision should put emphasis on **addressing the cocktail effect by introducing a mixture assessment factor (MAF)** to ensure that the legislation not only ensures individual products safety but also considers the combined exposure to similar substances (from multiple sources), to protect human health.
- **Per- and polyfluoroalkyl substances (PFAS) should be widely restricted** to protect health and the environment – both in consumer products and industrial use. Consumers are massively exposed to PFAS – not only through consumer products but mainly through food and drinking water. The environment is widely polluted with these forever chemicals, and it is urgent that we stop the pollution by ending all non-essential uses.

9.5. Food systems

Focus areas for consumers

The EU food system is unsustainable. It is simultaneously a driver of climate change and a victim of it. Unhealthy diets are a major driver of obesity and other non-communicable diseases which have reached startling levels across Member States, taking a heavy toll on European consumers’ health

while placing a burden on healthcare systems.

Although most consumers are willing to change their food consumption habits to eat more sustainably, they face significant

²⁷ https://www.beuc.eu/sites/default/files/publications/BEUC-X-2023-129_Harmful_chemicals_in_everyday_consumer_products.pdf

²⁸ <https://blog.beuc.eu/hormone-disrupting-chemicals-found-in-60-of-121-childrens-products>

²⁹ For more information see: [beuc-x-2021-038_towards_toxic-free_consumer_lives.pdf](#)

barriers³⁰. From price signals to marketing, accessibility and availability, the influence of food environments on consumers' choices is widely established. Today, these factors too often push consumers towards less healthy and unsustainable options. Improving people's diets will require actions that span

the entire food system and that involve all actors in the supply chain, from production to consumption.



Actions we recommend

- The European Commission should come forward with a proposal, as suggested in the Strategic Dialogue, to **regulate the marketing of unhealthy food to children**, both offline and online and in shops.
- **The future Common Agriculture Policy should be much more targeted**, in line with consumer expectations, rewarding farmers who adopt more sustainable practices.
- The European Commission should rapidly publish the planned proposals to **revise EU farmed animal welfare legislation** in line with consumer expectations and scientific evidence.
- The European Commission should come forward with its **proposal for a revision of the Food Information to Consumers Regulation (INCO)** including an EU-wide colour-coded front-of-pack nutritional label and nutrient profiles for the use of nutrition and health claims. Furthermore, the revision should have an overall focus on strengthening consumers' protection where they are in risk of being misled because of weak spots in the regulation. Ways to allow Member States to implement Nutrition Labelling at national level, such as a revision of the INCO regulation, should also be explored.
- **Digital tools such as QR codes are not appropriate measures for conveying essential information to consumers.** However, when they are used, the information they contain should be clearly worded to consumers. The labelling proposals in the recent Wine Package to replace words with symbols on the label are unacceptable from the consumer perspective.
- **The EU should adopt an Action Plan for Plant-based Foods**, following the success in Denmark, to strengthen plant-based agri-food chains from farmers to consumers.

9.6. Water consumption

Focus areas for consumers

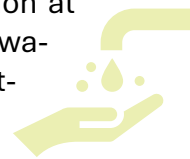
Safe and affordable drinking water and access to sanitation are a human right. Europe's water resources will come increasingly under stress which will

threaten affordability and availability for consumers. Increasing pollution from forever chemicals like PFAS and from intensive agriculture (manure, pesticides,

³⁰ BEUC, [One bite at a time: consumers and the transition to sustainable food](#), An analysis of a survey of European consumers on attitudes towards sustainable food, June 2020.

fertilizers), water abstraction and climate change pose a growing risk to consumers' access to water.

The EU and Member States must take decisive action to reduce pollution at the source, manage better fresh water supplies and wastewater treatment, and restore Europe's water cycles.



Actions we recommend

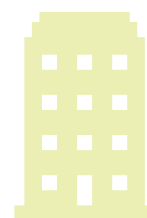
- **The EU Consumer Agenda should actively contribute to implementing the EU's water resilience strategy** with regards to raising consumer awareness about the needs for safe water and to avoid pollution. Many consumers may need support beyond awareness raising, such as incentives to install water saving equipment at home.

9.7. Housing affordability and energy efficiency

Focus areas for consumers

Housing offers consumers more than just a roof; it provides safety, promotes health, and serves as a foundation for a fulfilling life. Buying a home is often the most significant financial decision a person makes, and it also represents a valuable asset for homeowners. Functional private rental markets are equally essential to tenants' well-being. Over the past decade, housing market prices have sharply increased leaving consumers, especially young people, families with children and the most vulnerable, exposed to a real housing crisis and struggling to find appropriate houses to live in.

Also, 75% of the European housing stock has poor energy performance, leading to high heating and cooling bills, a lack of comfort and high greenhouse gas emissions. Improving Europe's housing stock's efficiency is the answer to the structural problem of energy poverty and the way to tackle high energy bills. After all, the cheapest source of energy is the one that is not consumed.



Actions we recommend

The European Commission's upcoming European Affordable Housing Plan should:

- **Prioritise housing renovation.** Most buildings European households will inhabit by 2050 already exist, and the majority are energy inefficient. Households must be encouraged to implement energy efficiency measures to reduce their houses' energy demand and fossil fuel emissions.
- **Provide consumers with operational support in the form of durable and reliable one-stop-shops.** The proper implementation of the Energy Performance of Buildings Directive and Energy Efficiency Directive will be key to ensuring their success. Importantly,

revenues from the EU Emissions Trading System 2 (ETS2) should be directed to fund one-stop-shops.

- **Ensure long-term financial support with benefits for all consumer groups.** The Multiannual Financial Framework plays a crucial role, and NextGenEU (Recovery and Resilience Facility) will continue to be vital in the coming years, including the capitalisation of de-risking tools (e.g. guarantee funds). Mechanisms should also be put in place to ensure fair outcomes for the beneficiaries of public funding, e.g. landlords. For example, a cap on rent increases could be introduced when landlords receive public funding for retrofitting.

ENDS