



Irish Presidency of the European Union

BEUC priorities
2026



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Introduction

The European Consumer Organisation (BEUC) is the umbrella organisation for 42 independent consumer organisations in 31 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 Irish member is the Consumers' Association of Ireland (CAI).

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 Irish EU Presidency to help shape the strategic agenda of the European Union in a way that serves both society and the economy. 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 continues topping the European Commission agenda and has materialised in several proposals. While BEUC and its members see some potential benefits for consumers in such an approach, ensuring a high level of consumer protection remains key. Strong consumer rights and protections drive trust, which in turn drives consumers to help make the economy flourish. However, we raise concerns about the latest developments such as rolling back fundamental rules for privacy and data protection.

Numerous legislative and non-legislative files of relevance to consumers will be on the Irish EU Presidency's agenda. We expect the Irish EU Presidency to help to advance or finalise them in a way that benefits consumers. We would like to draw your particular attention to the following initiatives:

Simplification proposals:

- **Digital Omnibus:** The Commission's proposal for simplification introduces important changes to the General Data Protection Regulation (GDPR) and ePrivacy directive, rolling back key consumer protections partially to the benefit of large, non-European tech companies. The EU should refocus the discussion on better implementation, easier compliance and enforcement of current rules.
- **Food and Feed Omnibus:** The Commission aims at increasing the competitiveness of EU farmers and the food and feed industry, as well as reducing administrative burden on Member States. It will be important to ensure that simplification does not result in de-regulation and that the precautionary principle is safeguarded: consumers need high food safety standards.

Upcoming EU proposals:

- **Revision of the Consumer Protection Cooperation Regulation:** It concerns the rules applying to the public enforcement of consumer protection law. It should ensure that consumers are well protected in case of infringements and that EU and non-EU traders play by the same rules.
- **Digital Fairness Act:** The upcoming revision of EU consumer law must ensure that consumers are better protected in online environments by closing legal gaps, ensuring more legal certainty for both consumers and businesses and reducing market fragmentation.

- **European Product Act:** The upcoming EU proposal must close the existing gaps by ensuring that there is always someone in the EU that can be effectively responsible for unsafe products being sold to consumers; by strengthening the resources and cooperation between the national market surveillance authorities and creating a centralised enforcement model for EU level infringements.

Ongoing discussions:

- **Digital Networks Act:** The Commission proposal to review the EU Code for electronic communications (EECC) is also inspired by the simplification narrative, going beyond a mere review of the EU telecoms rules. This review should safeguard the current rules which promote competition and consumer rights as key objectives in the EU telecoms markets.
- **EU's response to US tariffs and regulatory pressure:** The US are using tariffs as a coercive tool to obtain greater EU market access, modify EU laws and weaken consumer protections. The EU must stand firm in enforcing its laws and prevent damage to consumers when designing its counter measures.
- **Sustainable Finance Disclosure Regulation:** Strong criteria and simple, reliable product categories are required to build consumer confidence and avoid greenwashing. With the EU proposal recently published, the process must create a framework consumers can rely on to get investment products with the sustainability features they wanted and paid for.
- **Digital euro and access and acceptance of cash:** A digital euro would offer consumers a European public payment method online. At the same time, effective access to cash and the ability to pay in cash remains important for many consumers.
- **Savings and Investments Union:** The objective is to incentivize consumers to invest their savings and to improve investment outcomes. A low-cost saving and investment product for consumers would help to achieve these aims and tackle the increasing pensions gap.
- **Common Market Organisation:** The Commission has proposed to amend the CMO Regulation - a key objective is to strengthen the agri-food sector. This revision must include measures that contribute to making the healthy choice the easy choice for consumers.
- **CO2 standards for cars and the automotive package:** Following the Strategic Dialogue on the future of the automotive industry, consumers are expecting from the Commission concrete solutions to lower their mobility costs, and electric vehicles are the way forward.
- **Medical devices regulations:** The Commission's proposals include some positive elements, such as new measures for greater coordination between competent authorities. However, the extent and scope of simplification measures raise concerns regarding consumer protection. The revised rules must ensure the EU has robust pre-market and post-market systems in place to safeguard patient safety and public trust.

We count on the Irish EU 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 Ireland a most successful Presidency.



CONSUMER RIGHTS

1

Digital Fairness Act

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 which is expected for Q4 2026.

Recommendations for the Presidency

BEUC encourages the Irish EU Presidency to promptly start Council negotiations on this proposal.

What consumers need

- The digital environment must be fair by design and by default, supporting free choice and protecting consumers against misleading practices.
- The burden of proof for infringements of EU law must be eased, in particular in case of unfair personalisation, dark patterns and addictive design.
- A clear and comprehensive horizontal prohibition on dark patterns must be introduced alongside the ban of specific dark patterns (such as giving more prominence to certain choices or making the procedure to unsubscribe more burdensome than to subscribe).
- Addictive design features must be turned off by default.
- Premium virtual currencies and gambling elements in video games (such as loot boxes) must be prohibited.
- Influencer marketing must be more transparent and prohibited for certain dangerous or risky products or services.
- Personalised pricing and personalised advertising based on tracking and profiling must be prohibited.
- The cancellation of subscriptions must be facilitated, for instance by introducing a cancellation button.

ADDITIONAL SOURCES

Towards the Digital Fairness Act - A consumer checklist
Checklist
[BEUC-X-2026-019](#)

Turning stars into trust: how to make online reviews more reliable
Position Paper
[BEUC-X-2025-027](#)

From influence to responsibility. Time to regulate influencer marketing
Position paper
[BEUC-X-2023-093](#)

Towards the Digital Fairness Act
Position Paper
[BEUC-X-2025-110](#)

Monetising Play – Regulating in-Game and in-App Premium currencies
Position Paper
[BEUC-X-2024-061](#)

Each consumer a separate market? BEUC position paper on personalised pricing
Position Paper
[BEUC-X-2023-097](#)



DIGITAL POLICY

1

Protecting the consumers' data protection rights

Why it matters to consumers

The EU's General Data Protection Regulation (GDPR) is a pillar of Europe's digital rulebook on which the digital economy now depends and is fundamental to protecting people's right to personal data. Modifying the GDPR could create legal uncertainty, roll back existing protections for fundamental and consumer rights, and ultimately undermine the EU's ability to uphold high standards of privacy and data protection. Moreover, such a sweeping and fragmented reform stands to raise costs for businesses and even 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.

In November 2025, the **European Commission** presented its Digital Omnibus Proposals, amending the GDPR and the AI Act.

In April 2026, the EU lawmakers reached a provisional agreement on the AI Omnibus, amending the AI Act.

Recommendations for the Presidency

The Digital Omnibus' proposed changes to the GDPR would substantially weaken consumer protection by narrowing the definitions of personal data, removing consumers' consent over the processing of their personal data to feed AI systems, and enshrining derogations from obligations based on technologies yet to be developed.

Following the final agreement on the AI Omnibus proposal last May, the Digital Omnibus proposals' changes would be even more damaging for consumers, as the combined effect of both proposals would substantially weaken consumer protections, reduce accountability and delay effective implementation and enforcement of both the GDPR and the AI Act.

BEUC recommends safeguarding the essence of the GDPR and refocus the discussion on better implementation and enforcement. Any consideration of potential reopening must be based on a thorough impact assessment and public consultation, according to Better Regulation principles.

What consumers need

- **Simplification must not become deregulation.** The fundamental rights of consumers under the GDPR and AI Act must be protected: the right to privacy should not become a trade-off for the sake of AI deployment and (a few) AI companies' profitability.
- **Safeguarding rules that ensure a level playing field to strengthen competitiveness.** Effective and consistent enforcement of the GDPR ensures that all companies – especially non-European Big Tech - play by the same rules. This prevents unfair advantages for dominant players and supports a competitive market that benefits EU companies and consumers alike.
- **Focusing the simplification effort on improving the enforcement of the GDPR, particularly in cross-border cases.** The European Commission conducted thorough evaluation reports in 2020 and 2024 which failed to find evidence for a need to reopen the GDPR. The latest evaluation report and the EU's Competitiveness Compass instead identified a need to improve its implementation and enforcement.
- **Measures to support small companies to raise awareness about their obligations and help them comply.** It is in people's interest to ensure all companies comply with the law. However, this should not require amending the GDPR.

ADDITIONAL SOURCES

Protecting EU data and privacy rights in the Digital Omnibus Position Paper
[BEUC-X-2026-011](#)

BEUC concerns on Digital Omnibus - keep protections under GDPR and uphold the AI Act Letter
[BEUC-X-2025-105](#)

Consumer views on Digital Omnibus proposals - keep protections under GDPR and uphold the AI Act Letter
[BEUC-X-2025-116](#)

The GDPR should be better enforced, not reopened Letter
[BEUC-X-2025-037](#)

2

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 November, the **European Commission** presented a Digital Omnibus proposal which introduces substantive changes the GDPR and substantially weakens key aspects of the ePrivacy Directive.

Recommendations for the Presidency

We urge the Irish EU Presidency to consider amendments to the Digital Omnibus in line with the conclusions of the Council's 'Future of EU Digital Policy' and the EU Parliament's positions listed below. The result must maintain the protection granted in the existing ePrivacy Directive and the GDPR.

What consumers need

- **Electronic communications must be confidential.** 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 public interest purposes.
- **Devices and software must be set by default to provide the highest level of privacy protection.** An obligation to simply provide information about the privacy settings would undermine the 'data protection by design and by default' principle enshrined in the GDPR.
- **Consumers' consent is indispensable to monitor their behaviour and activities.** They must have access to digital services without being forced to accept unnecessary invasions of their privacy.
- **Consumers should be able to rely on NGOs, including consumer organisations,** to represent their interests and take initiatives whenever users' rights have been breached.

ADDITIONAL SOURCES

Consumer views on Digital Omnibus proposals - keep protections under GDPR and uphold the AI Act
Letter
[BEUC-X-2025-116](#)

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

BEUC concerns on Digital Omnibus - keep protections under GDPR and uphold the AI Act
Letter
[BEUC-X-2025-105](#)

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

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

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. Current discussions at EU level could encourage market deregulation, consolidation and challenge net neutrality, which would run contrary to the EU's achievements over recent decades.

State of play

The **Commission** proposed a Digital Networks Act (DNA) in January 2026 which goes beyond a mere review of the EU Code for electronic communications (EECC), being inspired by the EU's simplification narrative. This includes key changes to the EECC - including rolling back existent consumer rights - but also the EU Open Internet Regulation and the BEREC Regulation.

Recommendations for the Presidency

We encourage the Presidency to ensure the preservation of the pro-competitive and consumer-centric regulatory framework for EU telecoms. The DNA should preserve a high level of consumer protection, ensuring that harmonisation of consumer rights in telecoms rules does not aim for the lowest common denominator, rolling back more advanced protections for consumers already existing in most Member States. Moreover, the Irish EU Presidency should resist proposals for further deregulation challenging net neutrality and reducing competition in this sector. We recommend the Presidency to ensure that any upcoming proposal is strictly evidence-based and fully observes the European Commission's Better Regulation Principles.

What consumers need

- The Digital Networks Act should support 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."
- Member States and regulators to ensure that telecoms rules are fully implemented and enforced across the EU.
- 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.

- The Digital Networks Act should advance, not rollback, the rights of end-users under the EECC, increasing protections on contract transparency and information requirements, guarantees on portability and switching, accessibility and affordability measures, and Universal Service obligations.
- 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.
- Policymakers should reject changes to the Open Internet Regulation that could undermine net neutrality, including measures potentially similar to 'network fees', such as 'conciliation mechanisms' between content providers and telecom operators.

ADDITIONAL SOURCES

Preserving net neutrality in the upcoming Digital Networks Act
Joint statement
[BEUC-X-2025-065](#)

Preliminary concerns regarding the EC's white paper on EU digital infrastructure needs
Joint statement
[BEUC-X-2024-049](#)

Mind the (connectivity) gap: making digital infrastructure work for consumers
Position Paper
[BEUC-X-2024-057](#)

For more information: 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 pay their bills. This situation worsened with the recent war in the Middle East which started another fossil fuel crisis, with consumers having to pay the price. The EU needs to tackle the root causes of high energy and housing prices (e.g. through making energetic housing renovation and retrofitting affordable and convenient) while maintaining its commitment towards the energy transition.

State of play

In recent months, the **European Commission** published various policy initiative, such as the Citizens Energy Package and Accelerate EU, to help make the EU more resilient to fossil fuel crises and bring energy bills down for consumers. During the Irish EU Presidency, the **Commission** is expected to publish other important policy initiatives which will impact consumers, including the reform of the Renewable Energy and Energy Efficiency Directives and Affordable Housing Act.

Recommendations for the Presidency

BEUC calls on the Irish EU Presidency to progress on the implementation of the recently adopted Commission initiatives and to contribute to the preparation of the upcoming ones.

What consumers need

- To reduce the EU's exposure to future fossil fuel crises, the European Commission and Member States must double down on the deployment of renewable energy, clean energy tech (e.g. Heat Pumps) and energy efficiency measures, standing firmly by the ambition of recently adopted legislation.
- To decrease electricity prices for consumers, Member States should reduce electricity taxes and levies. Electricity bills should also be cleared from non-energy related levies.
- During the negotiation of the Grids Package, EU policymakers should ensure that the costs to modernise and expand electricity grids (due to the need to accommodate renewables, electric vehicles and heat pumps) are fairly allocated and do not disproportionately burden households.

- The EU and national governments must adopt a more coordinated and strategic approach to phasing out gas heating. This includes the development and implementation of local gas grid decommissioning plans. As gas demand declines, plans that specify when gas networks will be shut down should be prepared by 2030.
- When addressing the problem of housing affordability, Member States should ensure that housing affordability is not decoupled from sustainable housing. Energy efficient houses are the best solution for consumers on the long-term. They stabilise energy bills, improve indoor comfort and contribute to better health (thus reducing the costs of government with healthcare systems).
- Policymakers should progress on the implementation of the Citizens Energy Package. Several of the proposed measures (e.g. standardised energy bills) would have a positive impact on the energy market and help consumers to make more informed decisions.

ADDITIONAL SOURCES

How to ensure consumers are protected during the gas phase-out?
Report
[BEUC-X-2026-039](#)

How to make energy markets work for consumers and deliver affordable energy bills
Position Paper
[BEUC-X-2026-002](#)

The consumer policy take on EU renewable energy legislation in the 2030s
Response to public consultation
[BEUC-X-2026-034](#)

What's it like to live with a heat pump? The real consumer story
Report
[BEUC-X-2025-012](#)

The consumer policy take on EU energy efficiency legislation in the 2030s
Response to public consultation
[BEUC-X-2026-033](#)

Can consumers count on energy performance certificates? Mystery shopping in Italy, Slovenia and Slovakia
Report
[BEUC-X-2025-033](#)

How to protect consumers in (yet) another fossil fuel crisis?
Position Paper
[BEUC-X-2026-027](#)

For more information: energy@beuc.eu



ENFORCEMENT AND REDRESS

1

Revision of the CPC Regulation

Why it matters to consumers

Enforcement of EU laws faces growing challenges. A widening gap in power and resources separates large traders from enforcement authorities, which often operate under tight budgets and limited staffing. In the digital space, violations can occur rapidly and invisibly, allowing traders to profit before authorities can respond sometimes years later.

State of play

The Consumer Protection Cooperation Regulation (CPC Regulation) sets up an enforcement framework coordinating the work of national authorities responsible for the enforcement of consumer protection laws. A revision has been discussed for years and a European Commission proposal is expected by Q4 2026.

Recommendations for the Presidency

We ask the Irish EU Presidency to support the revision of the CPC Regulation to ensure that the enforcement of EU consumer rules fits the digital age and new business practices causing harm to consumers.

What consumers need

- **Greater centralised enforcement for addressing EU-wide issues:** When infringements affect consumers across multiple countries, relying solely on national authorities leads to inefficiencies. To address strategic cross-border cases, enforcement must be more centralised. The European Commission should be empowered to initiate and lead investigations with Member States and impose sanctions when traders fail to cooperate or breach commitments.
- **Enhancing the European Commission's independence and resources:** A stronger enforcement role for the Commission must come with greater independence. CPC actions against traders should be free from political influence to ensure credibility and public trust.
- **Bridging private and public enforcement:** Effective consumer protection depends on synergy between public and private enforcement. Both should not be mutually exclusive. The CPC Regulation, Representative Actions Directive, and Consumer Alternative Dispute Resolution Directive should be interconnected. For example, CPC decisions should impose follow-on representative actions.

- **Upgrading enforcement procedures and tools:** Authorities only use a minority of tools at their disposal to address unlawful practices. Selecting the right remedy requires understanding of what impacts traders most, considering their resources and market power.
- **Strengthening cooperation with consumer organisations in CPC procedures:** Under the CPC Regulation, certain entities can issue external alerts when they detect potential violations - BEUC has used this mechanism 12 times so far. While this cooperation has helped build trust, the process remains opaque. Complainants are still scarcely informed about investigations' progress or ongoing discussions with traders. Consumer organisations could contribute beyond alerts, providing evidence and engaging in remedy discussions.
- **Breaking silos and ensuring cross-cutting cooperation between authorities:** Many harmful practices - especially digital ones - have implications beyond consumer protection, touching on data privacy, competition, and safety. Yet cooperation between authorities remains limited.

ADDITIONAL SOURCES

Modernising consumer public enforcement in the EU
Consumer Checklist
[BEUC-X-2025-106](#)

Strengthening the enforcement of consumer protection rules
Position Paper
[BEUC-X-2022-135](#)

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 seek 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 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. The **European Commission** is evaluating whether Member States have implemented the rules in line with the Directive's key objective, which is ensuring access to justice in mass harm situations.

The **European Commission** is also evaluating whether the existing EU private international law framework remains adequate for cross-border collective redress actions.

Recommendations for the Presidency

We ask the Irish EU Presidency to hold a discussion in Council about how the Directive has been rolled out 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, and to countries still lagging with the full implementation of the Directive.

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 SOURCES

What is missing to collective redress to deliver for consumers
Checklist
BEUC-X-2025-104

BEUC's view on third party litigation funding for collective redress
Position Paper
BEUC-X-2024-091

Comparative Legal Study on Procedural Rules and their Impact on Collective Redress Actions in Europe
Report
BEUC-X-2025-026

Costs and financing of collective redress actions
Tool
BEUC-X-2022-087

Collective redress in Europe – two years on
Tool
BEUC-X-2024-084

For more information: enforcement@beuc.eu



COMPETITION

1

Revision of the EU merger guidelines

Why it matters to consumers

Merger control is crucial to determining whether mergers and acquisitions could harm competition and consumers, notably by increasing prices or limiting consumers' choice. Consolidation in the food sector may raise the costs of everyday products, while a merger between two airlines could limit regional connectivity and leave travellers with fewer options and higher fares. Many consumer-facing industries have become more concentrated, digital markets have reshaped competitive dynamics, and new drivers of market power have emerged. Update rules are therefore necessary to reflect these changes.

State of play

The European Commission published the draft merger guidelines in early May 2026 and opened a consultation period ending in June. The revised guidelines are expected to be adopted during the second semester of 2026.

Recommendations for the Presidency

The Commission's own analysis shows that rising concentration across EU markets negatively impacts not only prices – and therefore consumers' purchasing power – but also the EU's competitiveness and economic growth. Effective merger control is therefore fully compatible with scale, innovation and investment. In fact, weakening the current framework in the name of European champions would harm both consumers and the Single Market. We urge the Irish EU Presidency to ensure that European consumers' interest remains a guiding principle of the revised guidelines.

What consumers need

- EU competitiveness needs more competitors, not more consolidation which may lead to higher prices and less innovations.
- Merger control must continue to focus on the protection and development of competitive markets to be able to deliver lower prices, better quality products and services, and more choice for consumers.

ADDITIONAL SOURCES

Strengthening EU merger control: a consumer-centred checklist for competitive markets, March 2026
Checklist

BEUC-X-2026-018

2

Tackling unjustified Territorial Supply Constraints

Why it matters to consumers

Territorial supply constraints are distribution practices preventing consumers from accessing better prices and wider choice of goods due to the artificial price differences created across neighbouring markets. The price imbalances affect everyday goods (e.g., food items). While some of them can be explained by objective factors (e.g., transport costs, labelling or packaging requirements), others do not result from such determinants.

State of play

The [European Commission](#) launched a call for evidence in Q2 2026 and is expected to launch a public consultation in Q3 2026.

Recommendations for the Presidency

We urge the Presidency to push for greater transparency in price formation along the supply chain to understand how costs are passed on to consumers. Currently, it remains unclear to what extent price differences stem from manufacturers or from other factors. A new EU regulation should explicitly identify prohibited practices *ex ante*. It should also address suppliers who fall below the threshold of market dominance, but whose behaviour may harm consumers. Such legislation should narrowly define legitimate grounds for justification (for example where companies must comply with national regulatory requirements), and the burden of proof should rest with the companies.

What consumers need

Consumers should not end up paying the price for unjustified partitioning of markets.

ADDITIONAL SOURCES

Joint call by BEUC and Eurocommerce to tackle territorial supply constraints in the upcoming One Europe, One Market Roadmap (March 2026)
 Joint Letter
BEUC-X-2026-017



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 in legislative procedure

The **Commission** published legislative proposals on the digital euro and on the legal tender of cash in June 2023. The Council adopted their negotiating position ('General Approach') in December 2025 and Parliament position is expected for this summer, which would enable the Irish EU Presidency to start trilogue negotiations.

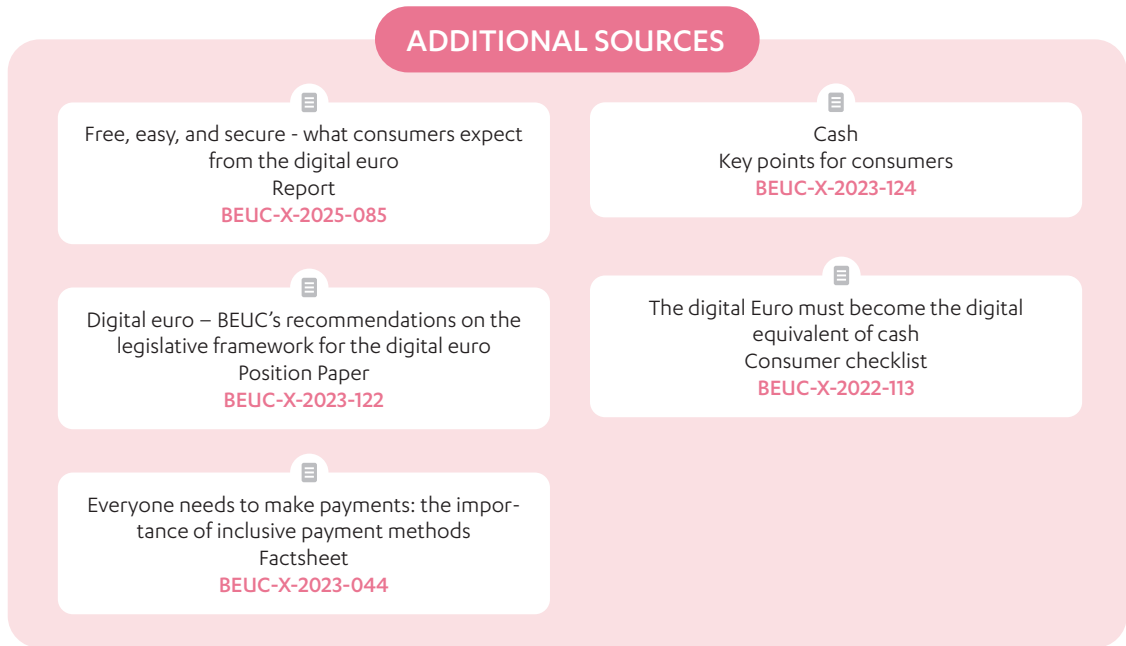
Recommendations for the Presidency

We encourage the Irish EU Presidency to aim for a trilogue agreement on the single currency package.

What consumers need

The 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 basic services including a payment card must be offered to all consumers free of charge.
- Ensure fair reimbursement in case of fraud in the form of charge-back mechanisms.
- Cash must continue to be accepted widely and remain easily accessible to consumers.



2

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. 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

In autumn 2025, the **European Commission** published several initiatives in the framework of the Savings and Investment Union. This includes a review of the pan-European Pension Product and several recommendations including on financial literacy, savings and investment accounts, pension tracking systems and pension dashboard as well as auto-enrolment of consumers into a standardised product. In addition, the **Commission** proposed more centralised supervisory powers for the European Securities and Markets Authority (ESMA).

Recommendations for the Presidency

We encourage the Irish EU Presidency to agree on its negotiating position (‘General Approach’) on the review of the Pan European Pension Product (PEPP) and continue the discussions in Council on the Commission recommendations related to the Savings and Investment Union.

What consumers need

- 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. Pension dashboards will allow policymakers to get a better understanding on the scale of the problems related to the pension gap.
- 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. An advice-free PEPP with a cost cap of 1% would enable this. Pension tracking systems will allow consumers to better seize the needs to invest for their retirement. ² Auto-enrolment solutions could circumvent the failure of our current financial advice architecture and contribute to higher engagement, provided the underlying product is of good quality. Auto-enrolment into poor quality products would be highly counterproductive.
- Savings and Investment Accounts paired with tax benefits on the account could help retail investors by reducing administrative burden and create incentives independently from the investment product chosen by the consumer.
- While not a silver bullet to address structural market failures, financial education needs to improve, and independent consumer organisations can play an important role in helping consumers to understand the importance of savings and investments. Education should not become a sales pitch – it is therefore important that the implementation of educational measures is not delegated to the financial industry.
- More centralised supervision by ESMA would improve retail investment markets. For products with a strong cross-border dimension, notably crypto assets, European supervision is more effective than keeping that competence at national level.

ADDITIONAL SOURCES

Trustworthy investment markets
BEUC's recommendations to the European
Parliament and EU Member States on the
Retail Investment Strategy
BEUC-X-2023-121

How the EU can make financial advice
fairer for consumers
Factsheet
BEUC-X-2024-025

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

The price of bad advice
Website
<https://www.thepriceofbadadvice.eu>

For more information: financialservices@beuc.eu

3

Sustainable Finance Disclosure Regulation

Why it matters to consumers

As shown by a [BEUC consumer survey](#), across Europe, 41% of consumers want to save and invest their money sustainably, taking climate action while saving for the future in line with their values. However, one third of consumers cite misleading, hard to verify, or unreliable green claims as a reason not to invest in sustainable finance products. The current rules for sustainable investment are very weak, allowing so-called ‘green’ products to invest in harmful activities like coal mining or oil drilling. Consumers end up being misled about their investment, which may be doing more harm than good when it comes to tackling climate change.

State of play

Both [Parliament](#) and [Council](#) are currently discussing their position on the Commission proposal. Depending on the progress made under the Cyprus EU Presidency, the Irish presidency will be tasked to seek a Council negotiating position (‘General Approach’) and possibly already start trilogue negotiations

Recommendations for the Presidency

We encourage the Irish EU Presidency to start trilogue negotiations.

What consumers need

- Clear product categories to easily identify sustainable investment options: From a consumer perspective only two product categories are needed. On the one hand, a sustainable category which caters to consumer demand for clean investments with strong exclusions and on the second hand a transition category for those who want their investments to support society’s move to sustainability.
- Strong safeguards against greenwashing: product categories should be ambitious and clearly exclude fossil fuel activities. The Environmental, Social, and Governance (ESG) basic category should be deleted as it has limited exclusions and no sustainability-related objective. Fund names must be clear, fair and non-misleading.
- As regards the transition category, a clear commitment from companies in the investment portfolio to avoid investments into new fossil fuel projects on the basis of sustainability-related engagement strategies, credible transition plans and science-based targets.

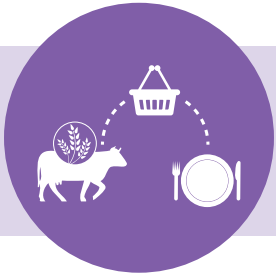
ADDITIONAL SOURCES

Sustainable Finance: Too green to be true?
Report
[BEUC-X-2025-099](#)

A consumer agenda for sustainable retail
finance & banking
Report
[BEUC-X-2024-053](#)

Review of the Sustainable Finance Disclosure Regulation (SFDR)
Key points for consumers
[BEUC-X-2026-009](#)

For more information: 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 European Commission presented its proposal for the post-2027 Common Agricultural Policy (CAP) in July 2025. The co-decision procedure is ongoing, with discussions focusing on the CAP's budgetary autonomy, governance architecture, and the balance between flexibility and common standards. The final post-2027 CAP will depend on the outcome of these inter-institutional negotiations and subsequent national strategic planning.

Recommendations for the Presidency

Consumers expect the CAP to sustain environmental goals, contribute to food affordability, and to better incorporate their concerns. The Irish EU Presidency should ensure that consumer priorities regarding how subsidies are distributed and spent are better reflected in the next CAP.

What consumers need

- The CAP represents about a third of the EU budget. 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. It is positive that the current post-2027 CAP proposal includes degressivity and capping.
- 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.

- 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 CAP should contribute to securing affordable food for consumers.
- Sustainable food consumption policies need to accompany more sustainable food production practices, such as the improvement of food environments where the healthy and sustainable choice is the easy one.

ADDITIONAL SOURCES

☰

The Common Agricultural Policy: What Consumers Want
Consumer Survey Report
BEUC-X-2025-044

☰

A Common Agricultural Policy that ensures healthy, sustainable, and affordable food for European consumers
Consumer recommendations
BEUC-X-2026-012

☰

Post-2027 Common Agricultural Policy (CAP)
Key points for consumers
BEUC-X-2026-026

🌐

For more information: food@beuc.eu

2

Food safety, supply chain fairness, and healthy diets

Why it matters to consumers

Food prices have reached unprecedentedly high levels over the past years in the EU, pushing many consumers towards less healthy, less sustainable food or even to restrict the amount of food they eat. Consumers want to eat more healthily and sustainably but face significant barriers to turn their intentions into action. Food environments need to change to make the healthy and sustainable choice the easy one for consumers in all settings, including schools. The EU must ensure as well high food safety standards.

State of play

In July 2025, the European Commission made a legislative proposal to revise the Common Market Organisation (CMO) Regulation. In December, the Commission published an omnibus proposal to increase the competitiveness of EU farmers and the food and feed industry. It also released its proposal for a Biotech Act to promote innovation in the food sector.

Recommendations for the Presidency

We encourage the Irish EU Presidency to ensure that the above-mentioned proposals are consumer centric. The Council should ensure that consumers' uptake of healthy and sustainable diets, including more plant-based foods, is facilitated. In addition, the Presidency should help ensure that any simplification initiative in the food and feed sector does not lower consumer protection standards. In promoting innovation, transparency and safeguards are essential to ensure alignment with the public interest.

What consumers need

- Common Market Organisation (CMO):** It is essential for children's health to limit their consumption at school of products high in free sugars and fats and exclude processed foods. It is also necessary to encourage children to learn about healthy diets, local food systems, and sustainability. To do so, the revised rules must require that the WHO guidelines on healthy diets are strictly applied across Member States. Public funding must prioritise fresh, minimally processed fruit, vegetables, wholegrains and legumes. Vulnerable children should be considered a priority. In addition, the revised CMO must enhance transparency on origin labelling.
- Food and Feed Simplification Omnibus:** Consumers need EU legislation that protects their rights. Any simplification proposal in the food sector must uphold the precautionary principle, ensuring that any changes to the regulatory framework prioritise consumer protection over economic convenience for other stakeholders. The EU must maintain time-limited approvals and mandatory reassessment at set intervals for pesticides, and current pesticide residue monitoring levels. To safeguard consumers, there should be no extension of grace periods for withdrawals of plant protection product authorisations. When it comes to food-related border controls, policymakers should only allow the partial release of consignments when each portion has completed all required checks, including laboratory tests where relevant. The EU should require Member States to have sufficient and well-trained staff in their competent authorities.
- Biotech Act:** It should include measures that contribute to transparency and independence of scientific advice provided by EFSA. For example, an obligation to describe pre-submission activities in its scientific opinions. The latter would help reinforce public trust in the regulatory system. Sandboxes, on the contrary, raise concerns as they risk compromising food safety standards. The Council should help ensure that EFSA receives sufficient funding from the EU budget to fulfil its mandate, including a new advisory role in food products' nutritional properties.

ADDITIONAL SOURCES

Food and feed simplification omnibus
Key points for consumers
[BEUC-X-2026-028](#)

Common Markets Organisation Revision
Key points for consumers
[BEUC-X-2026-004](#)

Biotech Act I
Key points for consumers
[BEUC-X-2026-041](#)

The illusion of choice: Why someone already
decided what you will eat for lunch
Report
[BEUC-X-2023-080](#)

For more information: food@beuc.eu



HEALTH

1

Access to medicines

Why it matters to consumers

Unmet medical needs, medicine shortages, and high prices, undermine patient access to treatment across the EU. Focus groups carried out with BEUC members showed that excessive profits by pharma companies do not sit well with consumers, and even less so when they consider the public sector's financial support for the development of medicines. Consumers would benefit from research models that support innovation while ensuring the affordability of medicines, as well as from more robust supply chains.

State of play

In December 2025, the European Commission made a legislative proposal for a Biotech Act aimed at boosting the EU's biotechnology and biomanufacturing sectors. This includes the development and production of pharmaceutical products such as vaccines and gene therapies.

Recommendations for the Presidency

The Irish EU Presidency should ensure that the Biotech Act supports innovation in ways that ensure patient safety, and the availability and affordability of medicines.

What consumers need

- Measures to facilitate patients' access to clinical trials, such as shorter assessment timelines, must go hand in hand with commitments to adequately resource competent authorities. This is essential to ensure high quality scientific and ethical review.
- Public funding to support biotech research and manufacturing (strategic projects) should be transparent and accompanied by measures that contribute to the availability and affordability of medicines. Beneficiaries should outline specific commitments in an "access plan".
- Instead of relying on intellectual property right extensions, the Biotech Act should support public-health driven push and pull incentives, such as milestone prizes with conditionalities.

ADDITIONAL SOURCE



Biotech Act I
Key points for consumers
BEUC-X-2026-041



For more information: health@beuc.eu

2

Medical devices

Why it matters to consumers

Consumers use a wide range of medical devices in their daily lives to walk, keep their heart beating, or check their glucose levels for instance. If these products perform poorly, they can disrupt consumers' health and quality of life. Consumers can also be negatively impacted by the shortage of safe and effective medical devices.

State of play

The 2017 revision of the EU rules on medical devices and in-vitro diagnostics reinforced public trust in the approval and post-market surveillance systems for these important products. However, the extended transition periods to implement the rules means that consumers have not yet reaped the full benefits. In recent years, there has been growing attention to the shortage and withdrawal of medical devices, the root causes of which are not always clear. The European Commission started an evaluation of the regulations on Medical Devices (MDR) and the In-Vitro Diagnostics (IVDR) and made legislative proposals for revised texts in December 2025.

Recommendations for the Presidency

The Irish EU Presidency should contribute to ensuring that the revision of the MDR and IVDR builds on the consumer-friendly measures introduced in 2017 and reinforces them where gaps have been identified. Simplification measures should not compromise consumer protection.

What consumers need

- **Conformity assessments:** conformity assessment certificates should initially be valid for up to five years. Following positive re-assessment, they could become valid for an unlimited duration, unless the notified body decides to issue another time-limited certificate. The current approach for conformity assessment should be maintained. The medical devices regulations should be kept in Section A of the AI Act, as was decided during the AI Omnibus negotiations.
- **Clinical evidence:** the use of 'equivalence' to demonstrate compliance with safety and performance requirements should not be made easier, as this could compromise the quality of clinical evidence. Clinical performance studies should be required for self-test, and there should be more collaboration between the Medical Devices Coordination Group (MDCG) and the Health Technology Assessment (HTA) Coordination Group on evidentiary requirements.
- **Innovation and devices for specific population groups:** manufacturers of 'breakthrough' and orphan devices should face specific post-market obligations; Sandboxes should come with stronger safeguards.
- **Post-market surveillance:** Periodic Safety Update Reports should be updated more frequently than proposed by the Commission. Member States should facilitate user-friendly means for consumer reporting of safety incidents, and unannounced audits in manufacturers' sites should not need to be 'for cause'.

- **Product information and transparency:** The digital version of an implant card should complement rather than replace the paper format. These cards should be handed to patients for all types of implantable devices. The scope of devices for which manufacturers should develop a Summary of Safety and Clinical Performance and a Summary of Safety and Performance (In Vitro Diagnostic devices) should not be reduced; there should be additional transparency requirements on assessment reports and clinical trials.
- **Device shortages:** Member States should set up public databases on shortages, and manufacturers be required to develop prevention plans.
- **Patient and consumer engagement:** The MDCG should establish a dedicated working party to consult with patient, consumer, and healthcare professional organisations.

ADDITIONAL SOURCE



Revision of the EU medical devices regulations
Consumer recommendations
BEUC-X-2025-100



For more information: 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, consumers need to trust that the EU will protect their rights and enforce them, despite the US administration pressures against EU laws. Also, 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

The EU concluded a framework agreement with the US in July 2025 to avoid the imposition of high tariffs on EU goods exported to the US. To materialise the agreement, the Commission put forward two legislative proposals to eliminate tariffs on industrial goods from the US and open further quotas for the US to export to the EU. A political agreement with the European Parliament and Member States has been reached in May 2026. This agreement adds a start and an end date to the framework agreement (called 'sunrise' and 'sunset' clauses). The Parliament and Council are expected to endorse the proposed regulations in June 2026. The US have started to partially implement the tariff part of the agreement. However, the situation remains highly unstable, with the US administration threatening to impose tariffs by 4 July on EU exports and asking the EU for more concessions, such as weakening consumer protection, including digital rights.

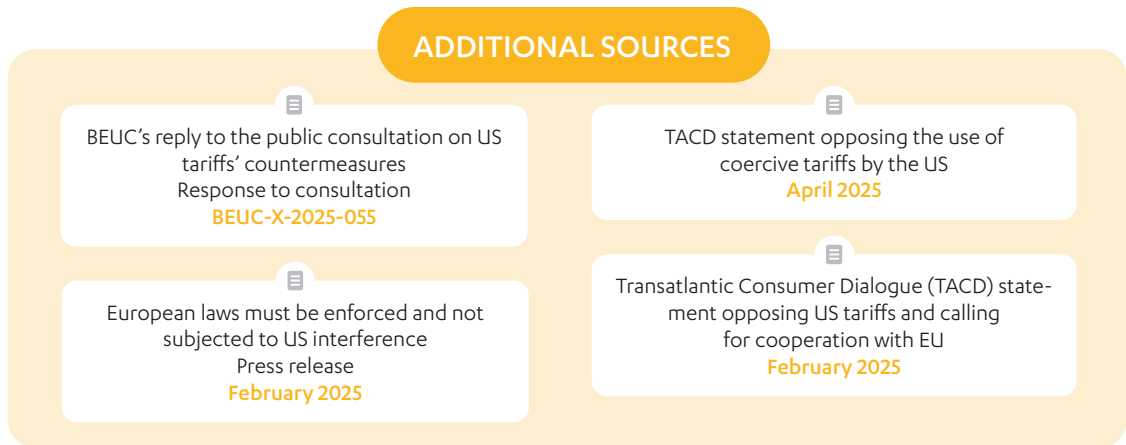
Recommendations for the Presidency

We call on the Irish EU Presidency to remain strong on preserving and enforcing EU laws, despite the US deregulatory pressure. We encourage the Presidency to preserve consumer choice and prices in case of deterioration of the relationship.

What consumers need

- Consumers should be able to trust that their current and future level of protections will resist US coercion. The EU must stand firm and enforce its laws designed to protect EU consumers and ensure EU's competitiveness. The follow-up discussions on the framework agreement, as well as the potential technology dialogue, must be highly transparent and engage civil society. Such discussions will be about regulations and could significantly impact consumer protection.

- Consumers should not be the collateral victim of a trade war:
 - Should the framework agreement fail for any reason, consumers' cost of living and choice must be upheld. This means the EU should refrain from imposing tariffs on US products for which alternatives are lacking – such as almonds – and on products relevant for the energy transition – such as heat pumps.
 - Should the EU decide to explore the use of the anti-coercion instrument with the US, a careful approach will be needed to avoid creating obstacles to services for which consumers have few alternatives. This is the case of payment services and retail investment products.



2

Customs reform implementation

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. Every day, 20 million small parcels enter the EU from abroad. When testing some of these products that enter the Single Market, BEUC members have found a significant inflow of non-compliant, dangerous and low-quality products. Looking at finances, the EU law requires traders to inform consumers of the total cost at the time of purchase, yet consumers are sometimes charged unexpected import fees upon delivery.

State of play

In March 2026, EU institutions agreed to reform the Customs Union. This political agreement is expected to be endorsed by the Parliament and the Council in September 2026. The first part of the reform should then enter into force. A significant part of the reform will need to be defined through non-legislative acts (implementing and delegated acts). In the meantime, all imports - including those below a value of 150 euros - will be subject to customs duties as of 1 July 2026 (abolition of the 'de minimis' exemption). Moreover, a European handling fee will be introduced in November 2026 to support customs authorities to cope with the high volumes of e-commerce. The Irish EU Presidency will have a key role to play in implementing the customs reform.

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 safety and environmental requirements, such as Ecodesign. We call on the Irish EU Presidency to facilitate the swift implementation of this ambitious reform.

What consumers need

- **Safe and compliant imports:** the Council must ensure the swift implementation of the reform and empower national customs authorities to prevent dangerous products from harming consumers. We call on the Irish EU Presidency to gather information from Member States about the impact of the reform on the supply chain and to coordinate with the Commission. This coordination will be key to identify early on implementation loopholes, such as importers declaring goods as being placed in temporary storage in warehouses to evade controls and taxes.
- **Protection against additional fees:** the customs reform foresees that consumers should not be the ones paying directly the customs duties that will be reintroduced in July 2026 for imports worth under €150. The Council must monitor the situation as some carriers and businesses are implying that due to technical difficulties it might be easier for them to charge consumers at the time of delivery rather than invoicing third-party sellers. Consumer law provides that consumers must know their order's total price at the time of purchase, not at the time of delivery. The same applies to handling fees, which must be collected from importers, not directly from consumers.

ADDITIONAL SOURCES

Ticking all the boxes for consumers in the EU customs reform
Checklist
[BEUC-X-2025-081](#)

e-commerce: new challenges for the sustainable transition
Factsheet
[BEUC-X-2025-036](#)

Reforming customs to better protect European consumers in global markets
Position paper
[BEUC-X-2023-114](#)

3

EU-UK relations

Why it matters to consumers

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. The EU and the UK summit in May 2025 gave further impetus to deepening the partnership. Negotiations for agreements on food safety and electricity have been launched and could be concluded in the coming months

Recommendations for the Presidency

We call on the Irish EU Presidency to contribute to further improving the EU-UK 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

- **A forward-looking food safety agreement:** the potential agreement on sanitary and phytosanitary measures (SPS) should enable smoother food trade across the Channel. However, the EU negotiating directives indicate that the EU and the UK can regulate to protect consumers and health, as long as this does not create obstacles to their bilateral trade. In this context, a draft law providing better food labelling for consumers, or requiring imported products to comply with domestic animal welfare standards could be considered as barriers to trade and be withdrawn. This would prevent consumers from making more informed food choices.
- **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 consumers' right to reimbursement, fraud prevention measures and obligations for online platforms etc. to help prevent fraud.

- **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 by the EU and the UK. We also recommend creating a dialogue between authorities, operators and consumer organisations to monitor new parcel processes under the Windsor Framework, which clarifies the Northern Ireland relationship with the EU following Brexit.

ADDITIONAL SOURCE

Strengthening the EU-UK relationship: concrete solutions for consumers
Report
BEUC-X-2025-041

4

Digital trade

Why it matters to consumers

EU consumers frequently shop online, and 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 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, Canada 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. The EU is also exploring a greater cooperation with the members of the Comprehensive and Progressive Trans-Pacific Partnership (CPTPP) on digital trade matters.

Recommendations for the Presidency

We call on the Irish EU 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. Restrictions could also create obstacles to the right of consumers to repair their everyday products, as most products nowadays cannot be fixed without access to software tools. 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

EU-Korea Digital Trade Agreement
Key points for consumers
[BEUC-X-2025-112](#)

It is time for the EU to rethink its digital trade policy and fully protect consumers' digital rights
Statement
[BEUC-X-2023-138](#)

EU-Singapore Digital Trade Agreement
Key points for consumers:
[BEUC-X-2025-015](#)

Consumer and digital rights groups call on governments to better protect people's fundamental rights in trade deals
Global Statement
[BEUC-X-2024-008](#)

Common statement on the Digital Trade Agreement between the EU and Singapore, By BEUC, EDRi and ETUC
Statement
[BEUC-X-2025-031](#)

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

For more information: international@beuc.eu



SAFETY

1

European Product Act

Why it matters to consumers

The sharp increase in the volume of small parcels entering the EU each year - many sold via online platforms - makes it significantly harder for authorities to effectively monitor compliance and prevent unsafe or illegal products from reaching consumers. Product testing done by consumer organisations keeps showing that far too many products sold via online marketplaces from third countries to EU consumers fail to meet safety standards, posing real risks to consumers' health and safety.

State of play

In its 2026 work programme, the European Commission announced its intention to introduce a new legislative proposal for a European Product Act, which will revise the Market Surveillance Regulation, the New Legislative Framework and the Standardisation Regulation. The proposal is expected in Q3 2026.


Recommendations for the Presidency

BEUC recommends the Irish presidency to swiftly launch discussions within the Council on this new proposal to ensure progress on the file.

What consumers need

- Online marketplaces must be recognised as economic operators to ensure that there is always someone in the EU that can be effectively held liable for illegal and non-compliant products sold to European consumers.
- An EU Market Surveillance Authority should be created and have the power to investigate and sanction EU level infringements.
- National market surveillance authorities shall be strengthened by increased resources and better cooperation mechanisms.
- More structured cooperation and involvement from consumer organisations shall be foreseen.
- Responsibility of economic actors shall be expanded to all products.
- Harmonised definitions for new economic operators and circular economy processes (e.g. refurbishment, remanufacturing, substantial modification) should be introduced.
- A credible and impactful Digital Product Passport which effectively increases compliance with EU legislation by facilitating enforcement authorities' oversight.

ADDITIONAL SOURCES


Under the microscope: Tests of Temu products
by consumer groups
EPA checklist
[BEUC-X-2025-007](#)


Towards the EU Product Act
Checklist
[BEUC-X-2026-050](#)


For more information: safety@beuc.eu



SUSTAINABILITY

1

Energy-efficient products Omnibus

Why it matters to consumers

The EU Energy Label is a true European success story. 93% of consumers recognise the seven-scale label and 75% rely on it to decide which electronic appliance to buy such as fridges and dishwashers. Coupled with Ecodesign measures that make appliances more energy-efficient, the label helps consumers save money if they choose top-class appliances. The label helps to lower energy demand and to protect consumers from energy price volatility. This is a long-term consumer protection tool.

State of play

Following a call for evidence in February 2026, building on an Implementation Dialogue, implementation reports and an impact assessment, the **Commission** is preparing an Energy efficient Products Omnibus focused on the energy labelling framework.

Recommendations for the Presidency

BEUC urges the Irish EU Presidency to secure a Council position that protects consumers while strengthening Europe's role in delivering energy-efficient products that enhance energy security and lower energy bills. Once the European Parliament's position will be available, BEUC urges the Presidency to ensure during trilogues that simplification of the EU Energy Label preserves the label's visibility, clarity and effectiveness at the point of sale.

What consumers need

- High visibility of energy labels at the point of sale, in store and online, to enable easy comparison and steer consumers towards the most efficient products.
- Mandatory physical energy labels, as evidence shows digital labels and QR codes alone fail to effectively influence consumer behaviour. Digital tools should remain complementary, not the default option.
- Faster implementation and regular updating of labelling rules reflect technological progress, including timely rescaling and limited coexistence on the market of the rescaled label and the old label, to avoid confusion.

- Clear responsibilities for manufacturers and retailers, ensuring full consumer access to information and effective market surveillance.
- A more consumer friendly European database (EPREL), with clearer information, less technical language, visuals and easy product comparison tools.

ADDITIONAL SOURCES

How the EU energy label can help consumers continue to save energy and money
Blog

What is the EU Energy Label? advertising
Factsheet

BEUC-X-2022-001

Energy-saving appliances: the silent money
makers in consumers' homes
Report

BEUC-X-2023-056

For more information: sustainability@beuc.eu



TRANSPORT

1

Revision of the CO2 standards for cars and automotive package

Why it matters to consumers

Mobility is the second-largest area of expenditure for European households. For those that depend on a car for their daily journeys, the purchase of a vehicle as well as with which fuel it operates is therefore an important financial decision. BEUC research shows that electric cars are a good deal for consumers. Small and medium-sized electric vehicles will soon be cheaper to run than their petrol equivalents. Most importantly, any new electric vehicle sold today will bring financial benefits to its second and third owners. This is crucial, as most consumers buy second-hand, and shows the importance of electrifying corporate fleets which represent most new car sales in the EU. Importantly, alternatives such as e-fuels or plug-in hybrids must not compete with electric vehicles.

State of play

In December 2025, the European Commission presented its “Automotive Package”. This includes:

- The revision of the CO2 standards for cars and vans
- A proposal on Greening Corporate Fleets
- An initiative to boost small electric vehicles made in Europe
- The revision of the Car Labelling Directive
- An Automotive Omnibus.

Several draft reports are already under discussion in the TRAN and ENVI committees of the European Parliament.

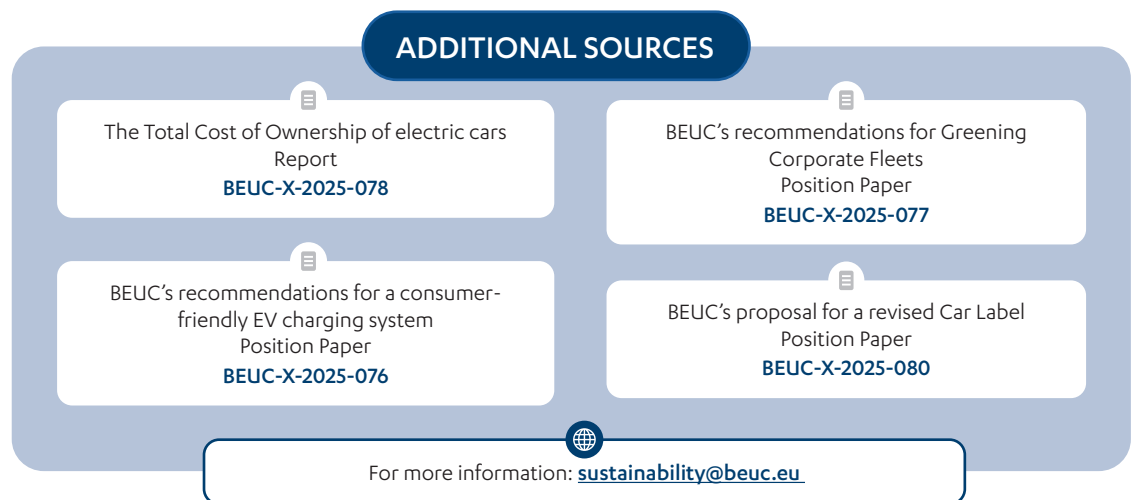
Recommendations for the Presidency

BEUC calls for a swift adoption of the package, with a focus on improving consumer information when buying a car and boosting the second-hand market for electric cars. To stay on course and boost consumer confidence, policymakers should ensure that 2030 and 2035 car CO2 targets are maintained. BEUC also calls for improving public support to consumers, for example via social leasing schemes, and accelerating the supply of second-hand electric cars. We also need better access to and more affordable charging solutions, along with better information about how long-lasting batteries are and how far they can go in real road conditions.

The review of the CO2 standards should refrain from offering costly solutions to consumers, such as plug-in hybrids, e-fuels and biofuels.

What consumers need

- Certainty regarding the trajectory for the car industry, boosting the availability and affordability of electric vehicles, by maintaining the 2030 and 2035 targets.
- Keeping the Plug-in Hybrids in check: real-world data show they are barely driven in electric modes, inducing high costs and creating affordability issues as they are not fit for the second-hand market.
- E-fuels and biofuels are expensive and should not be allowed in passenger cars.
- Corporate fleets should electrify faster to stimulate the supply of electric vehicles on the second-hand market, which is the relevant one for consumers.
- Clear information on the sustainability of cars and the technical specifications of electric vehicles, including the health status of the car's battery, the charging power and the real-life fuel/electricity consumption.



2

Passenger Package

Why it matters to consumers

Consumers want to move around more sustainably. The need for a modal shift especially towards rail is of such magnitude that it cannot rely on consumers' individual decisions alone. The pre-condition for consumers to change their mobility habits is to have a rail offer that is easy to use and attractive. Yet, planning a long-distance rail journey is paved with difficulties such as finding and paying for tickets, poor connection information or lack of rights for passengers who travel with different operators.

State of play

In May 2026, the European Commission published its Passenger Package, an ambitious proposal to encourage consumers to take the train via easier booking and strengthened passenger rights. Incumbent rail operators such as national rail market leaders will be required to sell their competitors' offers and share all their data with everyone, including the full range of fares. This will make it easier for consumers to book their rail tickets via a variety of platforms therefore increasing competition. Full passenger rights like assistance, re-routing, hotel and compensation would apply provided consumers buy their tickets in one transaction.

Recommendations for the Presidency

BEUC recommends launching discussions within the Council to ensure swift progress on the file. A strong majority in the European Parliament supports this package, which could pave the way for an interinstitutional agreement early 2027.

What consumers need

- Consumers should have guaranteed protection throughout their journey, no matter where they booked their ticket. In case of disruption, they should be entitled to core passenger rights: information, care and assistance, re-routing ('hop on the next train') and compensation.
- National exemptions to the application of the Rail Passenger Rights Regulation should be removed. Currently, 64% of EU trains are covered by exemptions. This is a real obstacle to making train travel more attractive.
- Intermediary ticket vendors should be governed by stricter rules. Provisions to regulate the reimbursement of tickets purchased via intermediaries in the air sector currently under discussion should be replicated into all passenger rights regulations, including rail.
- Consumers should have access to all rail travel options on relevant platforms. Information on schedules, fares and updated travel times must reach consumers in a neutral and timely fashion no matter where they booked their tickets.

ADDITIONAL SOURCES

Railway to (consumer) heaven
Position Paper
BEUC-X-2024-052

BEUC recommendations for a successful
"Single Digital Booking and Ticketing
Regulation" and the better protection of rail
passenger rights
Position Paper
BEUC-X-2024-087

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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 and risks posed by global conflict, 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. Negotiations on this last file ended after a conciliation procedure in June 2026.

Recommendations for the Presidency

BEUC encourages the Irish EU Presidency to drive the negotiations during the trilogues on the remaining issues from the 2023 proposals to make sure that EU passenger rights and their enforcement are strengthened, not weakened.

What consumers need

- 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).
- Core rights for multimodal passengers, such as information, re-routing, care and assistance should apply not only for passengers buying ‘single multimodal contracts’ but also ‘combined multimodal tickets’.
- 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 similar to the one which already exists in the Package Travel Directive to ensure consumers who book flights separately are equally protected.
- 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.

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

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

ADDITIONAL SOURCES

Trilogue negotiations on the Multimodal Passenger Rights initiative
BEUC's Recommendations
BEUC-X-2025-095

Fly light, pay heavy
Report
BEUC-X-2025-045

Trilogue negotiations on the Air Passenger Rights Regulation revision
BEUC's Recommendations
BEUC-X-2025-090

Passenger rights: enforcement and online booking intermediaries
Key points for consumers
BEUC-X-2024-039

The revision of the Air Passenger Rights Regulation. BEUC updated position.
Position Paper
BEUC-X-2025-021

Passenger rights: Multimodal travel
Key points for consumers
BEUC-X-2024-028

END



**Irish Presidency
of the European Union**

BEUC priorities
2026

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- AB Qendra Konsumatori shqiptar
- AT Arbeiterkammer
- AT Verein für Konsumenteninformation (VKI)
- 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 ΚΕΡΚΑ
- ES Asufin
- ES Confederación de consumidores y usuarios (CECU)
- FI Kuluttajaliitto ry
- FR Consommation, logement et cadre de vie (CLCV)
- FR Que Choisir Ensemble
- HR Unija potrosaca Hrvatske
- HU Fogyasztóvédelmi Egyesületek Országos Szövetsége (FEOSZ)
- HU Tudatos Vásárlók Egyesülete
- IE Consumers' Association of Ireland (CAI)
- IS Neytendasamtökin (NS)
- IT Adiconsum
- 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 (suspended)
- 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?



The European Consumer Organisation (BEUC) is the largest organisation promoting the general interests of Europe's consumers. Founded in 1962, it proudly represents more than 40 independent national consumer organisations from over 30 European countries. Together with our members, we inform EU policies to improve people's lives in a sustainable and fair economy and society.



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