

Why we need collective redress at EU level

A COMPELLING COLLECTION OF CASES





INTRODUCTION

From financial mis-selling scandals to faulty medical implants, consumers across the EU sometimes fall victim to products or services that cause them harm. But they usually have very little chance to get compensation in court because legal proceedings are expensive and time-consuming.

In situations of mass harm, often the only realistic option for consumers is to try to obtain compensation by going to court together and have an expert fight the case on their behalf (collective redress). But only a handful of countries have a working and easy-to-use system that allows consumers to claim damages collectively.

When the diesel emissions scandal broke in 2015, in which an estimated 8 million Volkswagen car-owners were embroiled, consumers were able to launch a collective redress case in only a few countries. This situation was in stark contrast to the US, where Volkswagen quickly settled because a class action was filed.

Very quickly, it became clear that European consumers were ill-equipped to enforce their rights despite fraud on a massive scale.

This brochure compiles a number of cases, from across the EU, where consumers were harmed on a mass scale.

Yet, in the majority of these cases, it was impossible to file a collective case, either because the system is too rigid, the requirements were too heavy on consumers, or there is no collective redress system at all in place.

The brochure also lists some of the successful cases of collective redress in the countries where there is a legal system in place that works to the benefit of consumers.

The European Consumer Organisation (BEUC) reiterates its call to the EU institutions to adopt proposed legislation (Proposal for a directive for representative actions for consumers, COM(2018)0184) which would introduce an effective system of collective redress in all European countries without delay. This system must be broad in its scope and be both efficient and easy to use. Consumers should not be left helpless when the next mass harm case strikes.

WHERE AND HOW EFFICIENT IS COLLECTIVE REDRESS IN THE EU?

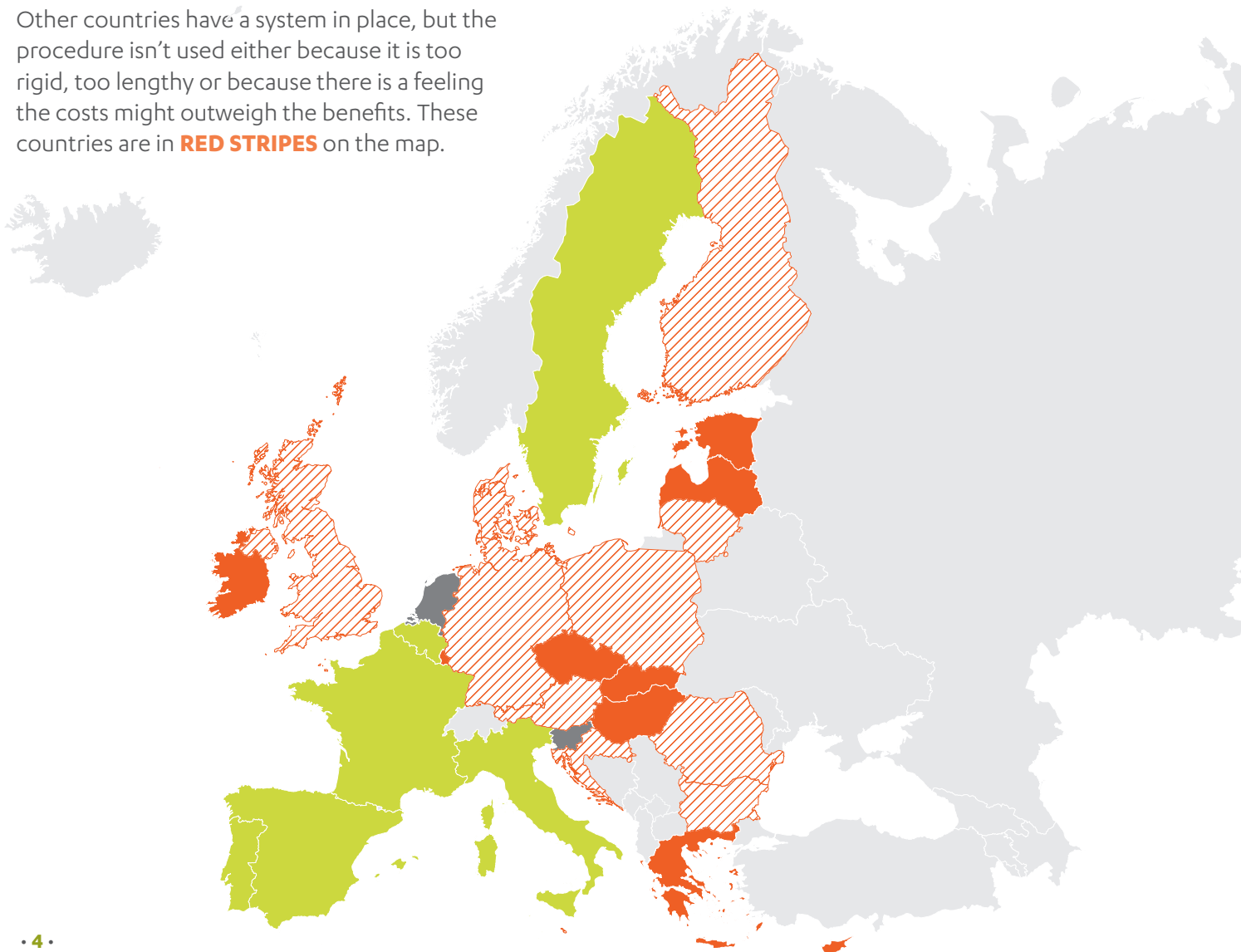
Some EU countries have, for decades, had a good system in place that allows collective redress actions. Unfortunately, most EU countries do not have functional, simple-to-use systems. The ease with which consumer representatives can file collective redress claims varies enormously according to the country, and there is no EU-wide scheme.

Only a handful of EU countries have a functioning and relatively easy-to-use collective redress system that consumers can use. These countries are in **GREEN** on the map below.

Other countries have a system in place, but the procedure isn't used either because it is too rigid, too lengthy or because there is a feeling the costs might outweigh the benefits. These countries are in **RED STRIPES** on the map.

Some countries have recently introduced a system that allows collective redress but it is too early to assess whether the system works well to the benefit of consumers. These countries are in **GREY**.

Finally, there are still countries in the EU where there is no way for consumers to claim compensation collectively in court. These countries are in **RED**.





STATE OF PLAY

The European Commission decided to take action in 2018 and proposed minimum standards for a collective redress system which would have to exist in all EU Member States. The Parliament and Member States will have to agree on what the system should look like before this proposal can become law.

For The European Consumer Organisation (BEUC), it is essential that the legislative proposal for collective redress applies to as many policy fields as possible to make it effective. It should be possible to file collective redress cases – for both material and moral damages – in the areas of financial services, telecoms and energy, data protection, health and passenger rights, dangerous products, as well as for infringements of consumer rights or contracts in general.

Collective redress is especially needed in the cases where the individual harm is low. In such situations, it is economically unreasonable for an individual consumer to take the trader to court. Collective redress can be the only means to secure compensation for consumers.

Consumer associations are the obvious non-profit bodies that should be given the legal standing to bring collective cases. Consumer associations are the first ones to help consumers when they have problems. They know the market situation and their expertise and mission will ensure that solid cases are brought to courts.

The cases which follow are listed by sector.

These cases caused consumers harm but there was either no collective redress system that allowed consumers to seek collective redress, or the system did not work well enough to lead to a positive outcome for consumers.

Deutsche Telekom shares



The German procedure does not allow collective redress. After the case had been in court for 11 years, the Higher Regional Court decided that Deutsche Telekom was responsible for the misleading information, but this did not lead to compensation for the company's customers.

FINANCE • 2005 • Germany 



CONSUMERS AFFECTED
16,000



ESTIMATED DETRIMENT
Estimated €200m

In the early 2000s, German consumers had the opportunity to buy shares in Deutsche Telekom.

Unfortunately, the information on the advertisements to buy shares was misleading and the share price later collapsed from €63.50 to €15.

More than 16,000 investors claimed damages from Deutsche Telekom due to misleading information in the prospectus.

Because of the sheer number of claims, a KapMuG procedure was started in 2005 by the legislator and the case was referred to the Court of Frankfurt. The KapMuG procedure is not a collective redress action but a test case procedure. It means that where at least 10 actions against the same company are filed and all raise the same or similar issues, the plaintiffs apply for a test procedure.

The court's decision is only declaratory, and the court only rules on the professional's liability, but it does not give any right to compensation. Each consumer must then individually claim compensation based on the KapMuG decision.

In 2014 the Federal Court of Justice ruled that the prospectus was partially wrong and misleading.

Unfortunately for consumers, because it was only a declaratory decision, consumers collectively still do not have any compensation.

SMS credit companies



No collective redress mechanism exists in Latvia.

FINANCE • 2016 • Latvia



CONSUMERS AFFECTED
N/A

ESTIMATED DETRIMENT
€5.23m

In 2016, several **Latvian** SMS credit companies, including major market players, were fined by the Latvian consumer protection authority for violating an interest rate cap. The largest fine was set at €80,000.

The damages suffered by consumers were roughly estimated by the consumer protection authority at €5.23m at least.

Because no collective redress mechanism exists in Latvia, this money stayed in the companies' pockets.

NLB bank savings accounts



At that time, the country did not have a system of collective redress. Only 160 consumers out of the 40,000 who filed claims, have been compensated by the bank.

The amount of compensation was between €1,500-€2,500 per consumer.

FINANCE • 2002 > 2006 • Slovenia



CONSUMERS AFFECTED
40,000 consumers



ESTIMATED DETRIMENT
Estimated €60m

In the early 2000s, the bank NLB offered consumers long-term savings contracts with increasing interest rates at a time when interest rates were decreasing.

Although advantageous for **Slovenian** consumers, these loans were not sustainable for the bank. Eventually, the bank unilaterally decided to change the interest rates initially agreed in the contracts.

The Slovenian consumer association ZPS successfully filed around 160 lawsuits, but there were almost 40,000 contracts of consumers who had been affected by the malpractice!

The bank offered out-of-court settlements for other consumers, but in a very large majority of cases, consumers only got around half of the damages the bank had caused.

DNB bank investment products



The collective redress system in Lithuania is inefficient.

Only a very small number of consumers (around 40) took their case before the Supreme Court of Lithuania.

The Court issued a ruling in 2016 that required the bank and the customer to split the investment losses by half each.

FINANCE • 2007 > 2008 • Lithuania



CONSUMERS AFFECTED
640 consumers



ESTIMATED DETRIMENT
€30m, according to an investigation paper produced in 2011 by the Lithuanian Securities Commission

From 2007 to 2008, DNB Lithuania (a subsidiary of the Norwegian bank DNB) misled consumers by actively marketing specific investments products as a 'safe' product. The product in question was called a 'synthetic index-linked investment product.'

While the product was sold as 'risk free', it was in fact as risky as gambling. Furthermore, consumers were convinced by the bank to take out loans to finance the investment.

In the adverse market conditions following the global financial crisis, a majority of consumers suffered huge losses imposed by the bank when the debt obligations on the leveraged investments matured. Over 600 customers incurred significant losses, totalling 100 million litas (nearly €30 million).

In some cases, consumers lost their family house or flat, or land.

The association "For Honesty in Banking" (a member of The Alliance of Lithuanian Consumer Organisations) tried several times to bring the case to court on behalf of all affected consumers on the basis of defending the public interest. All the attempts were unsuccessful, with different courts actually forbidding a consumer association from filing a case against the bank.

Loans in Swiss Francs



FINANCE • 2008 > 2015

Lithuania, Poland, Greece, Romania, Austria



CONSUMERS AFFECTED
**More than
275,000 consumers**



ESTIMATED DETRIMENT
Over €1bn

Between 2008 and 2015 many banks issued loans denominated in Swiss Francs to consumers in central and eastern EU countries.

Consumers were not correctly informed about the risks of subscribing to foreign currency loans and some banks even advertised to consumers that taking out a mortgage in Swiss loans was a safe choice.

The risk of currency fluctuations was not clearly explained to borrowers, and ultimately their mortgage debt soared after the Swiss franc rose sharply against the euro during the financial crisis in 2010-2011 and again in 2015 (in some cases up to a 50% increase in monthly instalments).

Several governments urged banks to convert Swiss Franc loans into the national currency at market rates but did not take any binding measures.

Most consumers did not get any compensation from the banks.



Only very few of the affected borrowers are defending their case because of the lack of effective collective redress mechanisms in these Member States.

Ryanair's mass flight cancellations



TRANSPORT • 2017 > 2018 • EU 



CONSUMERS AFFECTED
**Up to
700,000 passengers
potentially affected**



ESTIMATED DETRIMENT
**Estimated potential
loss of €178 million**

NB: the potential loss is based on an estimation of the passengers affected by the late cancellations and the minimum amount of compensation of €250 they might be due under article 7 of the EU's air passenger rights regulation.



No compensation for the vast majority of consumers. Most countries do not have a working, efficient system for collective redress. A collective redress action has been launched in Belgium in September 2019.

The Irish low-cost airline carried out two sets of massive flight cancellations between September 2017 and March 2018.

The company had cancelled 2,100 flights between mid-September and the end of October 2017, and 18,000 flights between November 2017 and March 2018.

These cancellations were due to strikes of the airline's staff and impacted about 715,000 passengers.

Facing numerous complaints from consumers, Ryanair still refuses to compensate its passengers by considering this strike an exceptional circumstance.

However, according to European case law, a strike by the staff of an airline is not considered an exceptional circumstance and does not exempt the company from paying compensation to air passengers.

The vast majority of the 715,000 passengers affected by these massive cancellations have not received compensation from the airline.

The Volkswagen emissions scandal



TRANSPORT • 2015 • EU 



CONSUMERS AFFECTED
8 million car-owners
in Europe

ESTIMATED DETRIMENT
N/A

The Volkswagen case is an industrial and health scandal linked to the Volkswagen Group's use of technology which fraudulently reduced pollution emissions of CO₂ and NO_x in laboratory tests.

On the road however, the cars gravely exceeded the legal limits. More than 8 million vehicles in the European Union (11 million worldwide) were affected. The fraud concerned Audi, Volkswagen, Seat, Skoda and Porsche cars.

Because there is no collective redress mechanism in many of the EU countries concerned, most of the consumers affected were left side-lined, and this despite Volkswagen acknowledging its fraud!

For now, only 4 consumer associations – Test Achats/ Test Aankoop (Belgium), Altroconsumo (Italy), DECO (Portugal) and OCU (Spain) – have taken Volkswagen to court in their respective countries using their national collective redress procedures. Vzbv (Germany) and VKI (Austria) have launched big court cases representing many consumers but these are not based on collective redress procedures. Together, these cases represent 600,000 harmed consumers. But this is far less than the 8 million cars affected in Europe. The actions are currently still pending.



Because there is no functioning collective redress tool at EU level, and despite the scandal affecting over 8 million car users in the EU, consumers in most EU countries will most probably remain without compensation.

Allianz Lebensversicherungs life insurance contracts

INSURANCE • 2012 • Germany 



CONSUMERS AFFECTED
**At least 1 million – only
80 got compensation**



ESTIMATED DETRIMENT
**Estimated between
€1.3 and €4 billion**



**No real collective redress
mechanism exists in Germany**

In 2011 the Higher Regional Court of Stuttgart ruled against Allianz Lebensversicherungs, nullifying certain clauses in its life insurance contracts.

The insurance giant had unfairly limited the amount of money paid out to life insurance policyholders when they terminated their policy before it had matured.

Around a million consumers were affected by the decision, giving them the right to claim compensation.

According to the German Consumer Association of Hamburg (Verbraucherzentrale Hamburg) such claims could add up to between €1.3bn and €4bn.

Since collective compensatory actions are not available under German law, the Hamburg consumer association tried to represent consumers, asking them to cede their claims to it, to take action against Allianz Lebensversicherungs AG in 2010.

In the end, only 80 consumers of a potential million received compensation.

Mobile phone cartel in France



No compensation for consumers because no collective redress system existed at the time.

TELECOMS • 2002 • France



CONSUMERS AFFECTED
20 million subscribers



ESTIMATED DETRIMENT
€1.2 billion

In France mobile phone operators agreed to fix prices in 2002.

This harmed 20 million subscribers with average damages of €60 per consumer, which makes an estimated total of €1.2 billion.

Following the initiative of French consumer group and BEUC member UFC Que Choisir, the cartel was sanctioned in 2005 by the French Competition Authority. The fine reached €534 million.

The victims were never compensated. Although the fine might seem large, a big part of the fraudulent profits remained in the pockets of these companies.

Telekom Slovenije's forced extra purchases



Due to the lack of a collective redress mechanism at the time, consumers were unable to get compensated collectively.

TELECOMS • 2002 > 2005 • Slovenia



CONSUMERS AFFECTED
40,000



ESTIMATED DETRIMENT
Estimated €4m

The national operator for telecommunications in Slovenia, Telekom Slovenije, unjustifiably forced consumers to rent an Integrated Service Digital Network (ISDN) connection to purchase ADSL broadband internet access, although their customers did not need it and it was not technically necessary.

This practice triggered a reaction from the Slovenian Competition Authority which ruled against Telekom Slovenije based on antitrust rules and abuse of dominant position.

More than 40,000 consumers are believed to have suffered damages which are roughly estimated at €100 - €150 per household, adding to a total of more than €4,000,000.

However Telekom Slovenije refused to pay out damages to consumers and there was no procedure that consumers could start to claim compensation collectively.

Foncia charges for rental payments



The courts excluded the use of collective redress on the grounds that the housing sector was not included in the French Consumer Code, which is the part of French law the collective redress system applies to.

HOUSING • 2014 • France



CONSUMERS AFFECTED

318,000 tenants potentially affected



ESTIMATED DETRIMENT

Estimated €44m

French consumer group UFC-Que Choisir accused Foncia, a French estate agent, of having unduly invoiced tenants for processing proof that they had paid their rent.

The amount was equivalent to €2.30 per month. However, the invoicing for proof of payments had been prohibited in France since 2006.

The courts gave a very restrictive interpretation of the law, stating that the rules governing the housing sector were not governed by the French Consumer Code, and therefore collective redress was not possible.

Despite a collective redress system in France, a very narrow interpretation can endanger the whole procedure by excluding any legal obligation not included in the Consumer Code.

The Slovenian electricity cartel



No compensation for consumers because no collective redress system existed at the time.

ENERGY • 2009 • Slovenia



CONSUMERS AFFECTED

At least 75,000 consumers



ESTIMATED DETRIMENT

Estimated total loss: €15 million

On 22-23 November 2007, five Slovenian electricity distributors (Elektro Ljubljana, Elektro Maribor, Elektro Celje, Elektro Gorenjska and Elektro Primorska) simultaneously announced an increase in retail electricity prices for households.

The Supreme Court ruled that the companies had acted in concert to raise prices, which violates antitrust rules.

Consumers should be able to be compensated because of the breach of competition law.

However, the absence of an effective collective redress at the time meant that, despite estimated damages of between €30 and €300 per household, consumers were unable to get compensation collectively. This allowed illegal actions to go unpunished since the companies kept their illegal profits.

Unfair price adjustment in energy contracts



ENERGY • 2009 • Germany 



CONSUMERS AFFECTED
300,000



ESTIMATED DETRIMENT
Estimated between €50 million and €150 million



No collective redress system exists in Germany – only 194 out of 300,000 consumers affected were compensated.

In 2005 and 2006, the Berlin-based energy supplier GASAG used a price adjustment contract clause, causing a significant rise to its gas prices and causing damages to approximately 300,000 German consumers.

The German Federal Court of Justice ruled against the energy supplier in 2009, declaring the specific contract clause void. Based on this ruling, a Berlin consumer association wanted to get a court decision for private damage claims in favour of consumers.

A single consumer's lawsuit would have been sufficient to declare the price adjustment clause unfair but, in view of often lengthy proceedings, there was a risk that other consumer claims could become barred because of time limits.

As a result, and because there is no collective redress mechanism in Germany, the consumer association tried to individually represent as many consumers as possible by getting them to cede their claims to it.

After a very long and burdensome procedure, only 194 out of the 300,000 consumers affected managed to go through that process and got compensated, via a settlement, for a total amount of €193,000.

Hip implants case



HEALTH • 2010 • UK, Belgium, France 

CONSUMERS AFFECTED
N/A

ESTIMATED DETRIMENT
N/A

Metal hip implants marketed by various companies, including DePuy from 2003 to 2010, were used in several EU countries, including the United Kingdom, Belgium and France.

Many of these were found to be defective, resulting in an abnormally high recall rate. The problem was the release of metal particles into the patients' bones and blood.

In the hip, the metal released can cause hypersensitivity, which leads to pain, effusion and alteration of the bone surrounding the prosthesis. As a result, patients had to take successive medical appointments, extra medication and their work and personal lives have suffered from the condition.

The ASR prostheses were worn by approximately 10,000 people in the UK, 1,500 in Belgium and 380 in France.

In July 2010, under pressure from the French health authorities, the producer was forced to withdraw the disputed model from the French market.

In Belgium, 1,500 of these implanted prostheses were recalled. In practice, this would mean more frequent checks for these victims and even, if the surgeon decided, the replacement of the prostheses.

In Belgium alone, the company made a clear commitment to cover the costs of medical examinations, and replacement procedures for defective implants.

It is a typical case where an effective collective redress mechanism could be a useful tool for consumers to get compensation.



At the time of the scandal, none of the countries where consumers were harmed had efficient collective redress procedures.

The following cases were resolved through a relatively well-functioning collective redress system.

Railway strikes in Belgium

TRANSPORT • 2014 • Belgium 



CONSUMERS AFFECTED
44,000

ESTIMATED DETRIMENT
N/A



An agreement was found during the admission phase of the group action by the court. A broad majority of the participants to the class action got compensated - 44,000 of them.

In 2014, there were several strikes at **Belgian** train operator NMBS/SNCB. However, the railway company refused to pay compensation to consumers affected. Belgian consumer group Test Achats/Test Aankoop then launched a group action.

An agreement was found during the phase of admission by the court. 44,000 of the participants to the group action got compensated.

Following this case, the NMBS/SNCB decided to change its compensation policy and to involve Test Achats/Test Aankoop in the development of the new NMBS/SNCB website to make it more consumer friendly.

NMSB/SNCB now grants compensation in case of a strike, the consumer gets more time to file for compensation, and the compensation can also be transferred directly to the consumer's bank account.

Rail travel chaos in northern Italy

TRANSPORT • 2014 • Italy 



CONSUMERS AFFECTED

Only 3,018 of a potential 700,000 passengers affected got compensation as the adherents to the group action (using an opt-in procedure).

This case was successful in getting compensation for thousands of consumers. However it also illustrates that opt-in procedures are less effective than opt-out procedures when the damages are small amounts of money.



ESTIMATED DETRIMENT

€100 per person



The appeals court of Milan ruled in favour of Altroconsumo's group action and ordered Trenord to compensate the members of the group action.

The Italian train operator Trenord had faced several failures in its operations software which caused discomfort to all affected users.

At least 700,000 passengers were caught in the chaotic delays and cancellations over a period of 15 days. The company was reluctant to compensate consumers.

Italian consumer group Altroconsumo filed a group action. 3,018 commuters adhering to the action were compensated €100 per person.

Unfair tenant fees for monitoring lift equipment



HOUSING • 2014 • France 



CONSUMERS AFFECTED
100,000



ESTIMATED DETRIMENT
nearly €2 million



The start of a group action led to an amicable settlement between Paris Habitat and the tenant union SLC - CSF Paris. Paris Habitat reimbursed the 100,000 tenants nearly €2 million for 2013 and 2014 financial years and will no longer charge the services in question.

The **French** tenant and consumer union SLC-CSF felt that, contrary to regulations and case law on rental charges, Paris Habitat, which is the social housing wing of the city of Paris, had unfairly charged its tenants for the costs of maintaining the remote monitoring system of their buildings' lifts.

This practice caused an annual loss of approximately €10 per tenant. The total loss was estimated at €1 million per year.

The tenant union expressly asked Paris Habitat to stop these practices. Despite the warning, the council refused to reimburse them or to stop its practices.

SLC-CSF filed a group action with a French tribunal in 2014. The goal was to obtain compensation for rental charges for nearly 100,000 Parisian tenants. Paris Habitat and the consumer group finally settled the dispute amicably. Paris Habitat reimbursed 100,000 tenants a total of nearly €2 million for 2013 and 2014 and stopped charging the services in question.

English school closures in Portugal



In 2010, the Supreme Court sided with Portuguese consumer group DECO. It ruled that the school and the financing institution BBVA should reimburse consumers after the school had closed.

The decision did not need enforcing as a settlement was reached between DECO, Opening School and BBVA Finanziamento because of the threat of a collective redress case in case the school and BBVA refused to reimburse the students.

EDUCATION • 2010 • Portugal 



CONSUMERS AFFECTED
1,200



ESTIMATED DETRIMENT
Between €400 and €1,200 per consumer

In 2002 Portuguese consumer organisation DECO received numerous complaints from consumers who faced the closure of Opening School (School of English) in various parts of the country.

The closure of the school had left about 1,200 students not only without the possibility to continue their studies, but also with a credit contract the students no longer needed.

When consumers registered at the Opening School, they could choose two possibilities of payment: immediate or taking up a consumer credit contract. The latter was provided by BBVA Finanziamento. When the school closed, the credit contract remained in force.

In 2010, the Supreme Court of Justice sided with DECO and the threat of a group action led to a settlement being found.

A similar collective action was launched by our Spanish member OCU against these same institutions. The action was also successful in securing reimbursement.



WHAT CONSUMERS NEED TO SUCCEED

This brochure shows that consumers are too frequently victims of mass harm scandals and are usually unable to claim compensation collectively in court, either legally or because of procedural complexities.

When consumers are harmed by a mass mis-selling scandal, or are cheated into buying one of millions of cars that break emissions rules, it is important they can claim compensation for the damages they have suffered.

Some countries in the EU do have a functioning collective redress system. We urge the EU institutions to get inspired by the Belgian or Portuguese systems to ensure that all Europeans can access a well-functioning and efficient procedure.

A system of collective redress at EU level would ensure justice for people and bring us closer to a modern, fair and balanced Single Market.

It is important that the Parliament and EU Member States ensure such a procedure is quickly adopted.

Consumers should not be left helpless in the way they were when the diesel emissions scandal struck in 2015. Consumer protection means ensuring all EU citizens can access a collective redress mechanism, when they need it.

BEUC MEMBERS

- AT - Arbeiterkammer
- AT - Verein für Konsumenteninformation
- BE - Test Achats/Test Aankoop
- BG - Асоциация Активни потребители
- CH - Fédération Romande des Consommateurs
- CY - Kypriakos Sundesmos Katanaloton
- CZ - dTest
- DK - Forbrugerrådet Tænk
- EE - Eesti tarbijakaitse LIIT
- FI - Kuluttajaliitto – Konsumentförbundet ry
- FR - CLCV
- FR - UFC-Que Choisir
- DE - Stiftung Warentest
- DE - vzbv
- EL - EKPIZO
- EL - KEPKA
- ES - CECU
- ES - OCU
- HR - Unija potrosaca Hrvatske
- HU - Fogyasztóvédelmi Egyesületek Országos Szövetsége
- HU - Tudatos Vásárlók Egyesülete
- IE - Consumers' Association of Ireland (CAI)
- IS - Neytendasamtökin
- IT - Adiconsum
- IT - Altroconsumo
- IT - Consumatori Italiani per l'Europa
- LT - Lietuvos vartotojų organizacijų aljansas
- LU - Union Luxembourgeoise des Consommateurs
- LV - Latvijas Patērētāju interešu aizstāvības asociācija
- MK - Organizacija na potrosuvacite na Makedonija
- MT - Għaqda tal-Konsumaturi
- NL - Consumentenbond
- NO - Forbrukerrådet
- PL - Stowarzyszenie Konsumentów Polskich
- PL - Federacja Konsumentów
- PT - DECO
- RO - Asociația Pro Consumatori
- SK - Združenie slovenských spotrebiteľov
- SK - Spoločnosti ochrany spotrebiteľov
- SI - Zveza Potrošnikov Slovenije
- SE - Sveriges Konsumenter
- UK - Citizens Advice
- UK - Financial Services Consumer Panel
- UK - Legal Services Consumer Panel
- UK - Which?

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