

Beuc's Vision for a 2020 Eu Consumer Strategy

*Beuc*¹

Introduzione

Il 10 maggio 2012, in occasione della celebrazione del suo 50mo anniversario, il Beuc (organizzazione europea dei consumatori) ha ufficialmente trasmesso alle istituzioni europee il suo documento sulla politica europea dei consumatori per il 2020. Fondato nel 1962, il Beuc - attualmente composto da 42 delle più influenti associazioni di consumatori di 31 Paesi europei - è davvero una delle più vecchie lobby di Bruxelles.

In occasione del suo anniversario, il Beuc ha deciso di dare uno sguardo al futuro e di contribuire alla realizzazione della politica Ue dando la sua visione della politica dei consumatori per il 2020, sulla base dei seguenti punti:

- *Dati.* Abbiamo chiesto a tutti i nostri membri di individuare, sulla base della loro interazione con i consumatori del proprio Paese, le principali sfide che devono affrontare i consumatori nel mercato attuale.
- *Inclusione.* È il risultato di una consultazione con i nostri membri, dove abbiamo fatto il possibile per dar voce alle preoccupazioni e alle prospettive di ognuno.
- *Apertura.* Abbiamo condiviso la bozza risultante con il *Consumer strategy panel*, composto da differenti *stakeholders* appartenenti alle istituzioni europee, all'industria, al commercio e alle università, dove abbiamo costruttivamente confrontato il nostro punto di vista con quello di portatori di interessi diversi.

Il risultato di questo lavoro collettivo è un'analisi trasversale delle difficoltà che i consumatori europei affrontano nel contesto della globalizzazione economica, della digitalizzazione della società, delle minacce al nostro pianeta, dell'invecchiamento della popolazione, come pure dell'attuale incapacità del singolo mercato europeo di affrontare queste difficoltà.

La nostra analisi ha portato all'identificazione di diversi obiettivi che dovrebbero guidare l'Unione europea e i decisori nazionali nelle loro politiche pubbliche. È importante notare che le raccomandazioni del documento del Beuc non si limitano a iniziative specifiche riguardanti la politica dei consumatori, ma sono state prese in considerazione per la definizione e l'implementazione di tutte le

¹ Il documento del Beuc sulla visione della politica dei consumatori è frutto di un lavoro collettivo tra il segretario e i membri del Beuc, sotto la guida del suo

presidente Paolo Martinello e con la collaborazione di Anna Fielder, consulente esterno. Ringraziamo tutti coloro che vi hanno contribuito.

politiche che hanno un impatto diretto o indiretto sul *welfare* dei consumatori, come l'energia, la salute, l'ambiente, i trasporti, le politiche agricole o digitali.

Queste raccomandazioni riflettono il concetto fondamentale che sottende la visione del Beuc e che guida costantemente il nostro lavoro: negli attuali tempi di difficoltà economica, la politica dei consumatori è troppo spesso ed erroneamente considerata un lusso. In realtà, costituisce un elemento chiave di crescita economica: i consumatori fiduciosi spingono i mercati. Per meritare questa fiducia, i mercati devono rispondere ai bisogni dei consumatori e alle loro aspettative. Dove ciò non è fatto spontaneamente dalle forze di mercato, la politica deve intervenire. Le raccomandazioni del Beuc per il 2020 sono lo strumento per contribuire alla promozione dell'interesse dei consumatori e allo sviluppo di un mercato efficiente.

Sintesi

La strategia della politica consumerista deve adattarsi costantemente all'ambiente in cui il consumatore vive. La rapida evoluzione delle tecnologie sta cambiando le nostre vite, il modo di comunicare e il nostro rapporto con il mercato. Nel frattempo, molti servizi pubblici vengono privatizzati. La politica consumerista deve fare i conti con questi cambiamenti per non rischiare di essere lasciata indietro a discapito del benessere dei consumatori. In tempi come questi, le istituzioni europee devono formulare una strategia efficace che possa rimediare al fallimento dei mercati. La crisi economica dovrebbe essere trasformata in un'opportunità per porre le persone al centro della politica e avere consumatori fiduciosi. Per arrivare a ciò, le decisioni politiche devono essere prese in stretta cooperazione con i consumatori e con i loro rappresentanti.

Inevitabilmente, i settori più importanti per il benessere dei consumatori sono anche i più problematici. Energia e servizi finanziari sono in cima alla lista delle preoccupazioni dei consumatori in tutti gli Stati membri, seguiti dalle telecomunicazioni e dall'alimentazione, mentre l'aumento costante dei prezzi è un interesse trasversale che riguarda i mercati formalmente regolati che sono stati liberalizzati sotto l'egida europea. La liberalizzazione è stata promossa per favorire maggiori possibilità di scelta e prezzi più bassi ai consumatori. La realtà è più che deludente. È diventato evidente negli anni che la liberalizzazione dei mercati non significa "automaticamente" maggiore competitività e che in tanti, se non tutti, i settori liberalizzati, i consumatori testimoniano asimmetrie informative e l'avvento di potenti oligopoli che si spartiscono i mercati.

Per una crescita intelligente e sostenibile, i consumatori devono:

- poter fare scelte informate e consapevoli;
- avere accesso a beni e servizi di qualità;
- acquisire consapevolezza dei propri diritti;
- avere una forte e influente rappresentanza sia a livello nazionale sia europeo.

Old challenges, new challenges, fresh vision

The regulatory background

EU consumer policy has entered its fifth decade. In the early days, the key challenges facing consumers were:

- *product and services safety;*
- *finding truthful and non-biased information, and having effective choice;*
- *gaining protection against abusive marketing practices and unfair contract terms;*
- *access to redress and effective participation in decision-making.*

These have resulted in many different measures, laws and regulations. EU consumer policy has a strong legal grounding: Articles 114 and 169 of the Treaty on the Functioning of the EU (TFEU) state that the EU institutions must base their measures on, and contribute to, a high level of consumer protection. And according to Article 12 TFEU, consumer protection requirements shall be taken into account in defining and implementing other Union policies and activities.

But the consumer protection framework needs to be constantly watched over: to monitor its enforcement, ensure its relevance and provide, where needed, measures for improvement. Legislation has not properly addressed some of the existing challenges, and new challenges for policymakers are emerging all the time.

Beyond laws and regulations

Consumer policy strategy must constantly adapt to the global environment in which consumers live. Fast-evolving technologies are changing our lives, the way we communicate and our relationship with products. The world works online without borders, and that includes formal and informal decision-making structures; our governments now engage with us on social networks, for example. Meanwhile, more and more public services are being privatised. Consumer policy must keep pace and merge seamlessly with all these critical developments, or it will be left behind, to the detriment of consumer wellbeing.

To ensure long-term consumer wellbeing, consumer policy must also address the crisis in world markets: problems with the banks, the scarcity of raw materials, climate change and ageing populations.

A people-centred consumer policy strategy

In 2012, BEUC, the European Consumer Organisation, celebrates its 50th birthday. During the past 50 years we have seen, and strongly contributed to, some great achievements for the wellbeing and rights of EU consumers: they have some of the strongest consumer rights in the world, clearer food labels, safer products, holiday guarantees, cleaner beaches, cheaper phone calls and can shop freely in the world's largest internal trading market. But we feel that a "people-centred" consumer policy hasn't been achieved. More work is needed to make sure consumers can really profit from the single market and to achieve a more sustainable, inclusive and responsive economy.

Consumers' lives have also become increasingly complex. We live in turbulent times. The impact of the 2008 recession, still being acutely felt in many member states, has dented consumer welfare and spending power, and has sharply increased the number of people vulnerable to deprivation. At the same time, our member organisations throughout Europe report increasing numbers of complaints, toothless authorities that do not enforce consumer rights and failing liberalised sectors that do not deliver value for money or good service.

In times like these, EU institutions must take charge and formulate a consumer policy strategy and actions that have the vision, integrity and strength to address and remedy these failings. The economic crisis should be turned into an opportunity to put people at the centre of policymaking and have confident consumers as the drivers of well-functioning markets. To see a shift to sustainable consumer patterns, policy decisions must be made in close cooperation with consumers and their representative consumer organisations.

The ultimate goal of the strategy must be to improve consumer wellbeing through raising living standards while protecting the environment. It's a tall order, but we believe it can be achieved. BEUC and its members are ready to support and cooperate in such action.

In 2020 we want to see a Europe that strives to move the world towards better consumer protection, and where consumers:

- have straightforward, meaningful choices in fair and competitive markets and can exercise them;*
- get access to and better value from all goods and services, including basics such as health, energy and food;*
- benefit fully and safely from advances in technology;*
- have the knowledge and awareness to exercise their rights;*
- have access to impartial information and advice;*
- are given adequate and efficient tools to obtain redress;*
- find sustainable choices to be the easy and affordable ones;*
- trust that EU policymaking fully takes account of their interests; and*
- benefit from a strong and influential consumer movement at national and at EU level.*

The EU single market: an unfinished symphony

BEUC member organisations express mixed feelings when it comes to the visible benefits that the EU single market project has brought for consumers. Many good things are highlighted, such as innovation stemming from ideas and competition travelling across borders, harmonised and improved consumer rights (particularly from our members in the “newer” member states) and pro-consumer improvements in certain sectors, particularly telecoms and air travel.

But the general feeling is that the EU single market is still only “a partial reality for consumers”. This partial reality is particularly visible in the online environment, where the EU digital market is still divided by the established geographical borders, as a result of antiquated copyright laws and company practices. As some have expressed it, while the single market engine has been put in place, its mechanisms are not working; the mechanisms to deliver for consumers need to be reliable and consistent.

Reports from the frontline

In a recent survey, we asked our members about current problems in their countries, future challenges and whether the single market has delivered for their consumers. As trusted organisations working with consumers and their problems on a daily basis, or carrying out extensive research, they have their fingers on the pulse and are well placed to assess conditions in their countries. Here is what they found.

Rights on paper, but not in reality

Our member organisations mentioned three key problems in the consumer protection landscape.

- *Too much room for self-regulation: In many sectors, EU policymakers rely on industry self-regulation. While self-regulation can be a useful additional tool under certain conditions, our experience shows that many such initiatives fail to deliver concrete rights to consumers and fall short of being smart alternatives to regulation by public authorities. Financial services is one of the major sectors where over-reliance on self-regulation has shown to be disastrous for consumers.*
- *National enforcement authorities with no teeth: Even when consumer protection regulation does exist, in practice, there is an acute lack of effective enforcement throughout the Union, and rights are widely violated as a consequence; this is also reported as an increasing problem as public budgets are squeezed more and more. The fact that Europe imports a lot of its goods is a particular challenge in terms of enforcing product safety rules. The public*

agencies regulating the energy and financial sectors come in for particular mention.

- *Asserting legal rights: There is a lack of easy access to justice and redress, including alternative dispute resolution (Adr) and collective redress mechanisms. The extent and nature of this problem varies between countries, as the systems are different in each. But in general, individual consumers are deterred from going to court by the high costs and general bureaucracy of judicial systems, while various forms of non-judicial enforcement, such as ombudsmen services, arbitration or mediation services can be patchy and uncoordinated. The problem is now even more acute due to the squeeze on public funds. In some of the newer EU countries, the lack of access to justice is reported as being practically total. Online dispute resolution is still in its infancy. The lack of effective redress mechanisms - public and private - is seen as a major barrier to cross-border shopping.*

Lack of official support for consumer policy and organisations

Consumer organisations from old and new member states generally reported the same problems, though those from the newer member states tended to report more extreme cases of basic rights abuse by providers, as well as the need for consumer education. In all EU countries, as well as at EU level, consumer organisations have insufficient funds to cover the broad range of issues relevant to consumers.

One important difference, however, was between the national governance systems - members in the newer member states report a general lack of understanding and support for consumer policy from both politicians and authorities, and a consequent lack of resources among authorities in charge of consumer protection and a lack of support to consumer organisations. This is a problem well evidenced in our recent report on the state of the consumer movement in Central, Eastern and South Eastern Europe (CESEE), and also in the Commission's latest Scoreboard, which shows, for example, the minute amounts of money devoted to this sector.

The latter problem is not confined to the newer members, however; the financial crisis and consequent budget cuts are causing reductions in and mergers of dedicated consumer protection authorities in other member countries too. Generally, our members remark that consumer protection authorities are just not strong or able enough to cope with the negative impacts on consumers in complex liberalised markets (such as energy, financial services and telecoms), even though the situation does vary from country to country. Further, in the context of increasing liberalisation, regulators are often the only authorities with powers to deal with consumer protection in the sector at stake. These regulators can be trapped in the so-called "regulators' capture", ie they are more concerned with creating the right market conditions for the industry than with addressing the needs of consumers.

Empowerment or information overload?

Empowering consumers is the holy grail of current EU strategy and research. It is also a policy target for national governments, often in tandem with policies for smarter regulation or deregulation. It means that consumers take decisions and choices into their own hands where they can - provided that they have the right tools to do so - such as “real choices, accurate information, market transparency and the confidence that comes from effective protection and solid rights” (EU Consumer Policy Strategy, 2007-2013). If the 500 million EU consumers have all that, they can influence markets with their collective power.

The reality, however, as our members tell us, is rather different. Numerous elements converge to disempower consumers by making it impossible for them to understand and act on the information they receive. This “information tyranny” or “information pollution” takes the form of:

- Information overload - the “volume” of decisions that consumers must make has grown exponentially.*
- Increasing (sometimes artificially) the complexity of market sectors, products and services. In recently liberalised sectors such as mobile telephony or energy there are hundreds of complex tariffs, preventing consumers from making the most suitable choices. Our members call this “telecomplicated” and “confuseopoly”.*
- Delivering essential information in (often artificially) complex ways: for example, detailing a huge range of extra charges, clauses, product combinations in ant-sized print. These can make it hard for consumers to understand or abide by the rules, and easy for business to profit from the extra charges. Too often companies make deliberate use of consumer information fatigue and their behavioural biases in their communication strategy.*

This increase in disempowerment, the reverse of what official strategies aim for, is compounded by the fact that current policy initiatives do not necessarily take into account the different information needs of people according to their particular conditions or vulnerabilities.

Ultimately, this “confuseopoly” makes choices difficult, as there are so many dimensions to consider for each product and service. The “right” choice is not an easy one. Searching for and receiving the necessary information - if it’s available - is not only complicated, but demands a great deal of time, which most consumers in their hectic daily lives cannot and do not want to spend. Being a well-informed consumer increasingly becomes a full-time job.

Finally, a modern consumer policy must take into account that information proliferation does not automatically lead to “better” consumer decisions, as it does not generate consumer knowledge. Consumer policy measures must therefore aim to improve consumer knowledge, for example, by providing “choice filters” (something that consumer organisations are very good at providing for their members).

Essential services and product sectors most problematic

Invariably, the most essential sectors for consumer wellbeing are also the most troublesome. Energy and financial services are top of the list of consumer concerns throughout member states, closely followed by digital and telecommunication services and the food sector. Constantly rising prices are of universal concern – but each of these sectors displays its own failures.

- *In the energy market, there is concern over complex tariffs, rising prices, poor service or miss-selling, difficulty in switching and confusion over what consumers can do to lower their bills, including energy efficiency. The result is a large increase in the number of consumers paying too much for their energy and even unable to afford to light and heat their homes. Markets do not function properly, leading to dramatic price increases, and there is little choice or added value in choosing between providers.*
- *In the food sector, as well as concerns about dramatic increases in prices, the biggest concerns were related to exposure to risks and hazards and health, and in particular tackling increasing obesity rates and diet-related diseases. Our members point to marketing to children and sponsorship of children's programmes by companies producing foods high in fat, sugar and salt, perpetuating these problems into the future.*
- *In the retail financial services sector there is an even longer catalogue of concerns: needless complexity of financial products, a lack of transparency within businesses and lack of trust in the business itself; bad or insufficient advice and hidden commissions for intermediaries resulting in financial product miss-selling to consumers; high costs and risk compared to revenues in investments; and no access to basic banking for some of the most vulnerable consumers. On top of all this, there is snail-pace progress in measures to improve consumer protection in this failed sector. Powers are on the side of banks, rather than the people they are supposed to serve.*
- *In the digital sector, which has become not only an essential service, but also the new market driver and life-blood of innovation, the key concerns are of a lack of privacy, covert means of data mining and breaching data protection, security and fraud issues, a shift towards repressive enforcement of intellectual property rights, and limited legal offers of digital content (such as catch-up tv), which is often available in only some member states. In the related telecoms market, BEUC members highlight the complex tariff structures and contract lock-ins which make changing providers difficult, abusive practices in some countries, complicated contracts and unfair contract terms. Increasingly, if you are not connected, you are excluded, and many of Europe's consumers still are. Moreover, we are still in the stone age of digitalisation with a lack of consumer-driven innovation – most digital products are designed in a way that leaves consumers helpless if they're not tech-savvy.*

Liberalised markets not living up to consumer expectations

Many of the examples in the previous paragraphs relate to formerly regulated markets that have been liberalised under EU policy. This liberalisation process has been launched towards the public by promoting the positive effects that such an approach will have on markets, prices and consumer choice. The reality is more than disappointing: it has become evident over the years that the liberalisation of markets does not automatically mean more competition and that in many, if not all, of the liberalised sectors, consumers witness more and more concentrated markets and the advent of increasingly powerful oligopolies.

A consumer policy for sustainable growth and welfare

Consumer policy as an element of growth

A strong and modern consumer policy is an important part of providing the way out of the current crisis, and to avoid crisis in the future. It must be a pillar of a strong, solid and modern EU single market.

The role of consumer policy as a driver for growth has never been really taken to heart by the EU policymaking community, whose principal goal, certainly in more recent years, has been to decrease business transaction costs for inter-community trading. Politicians encourage consumers to consume ever more because this means more state income, more employment, more production and consequently more growth. The realities of increasing consumer deprivation, uncertainty and an alarming increase in bankruptcies have not been addressed adequately, yet the lack of consumer confidence has a huge effect on the economy (consumer spending accounts for 50-75% of the GDP in industrialised nations).

More than ever, we need EU and national policymakers to see consumer policy as one of the essential drivers of economic recovery, alongside competition policy, industrial policy and - equally importantly - social justice in markets. Also, it is crucial to acknowledge that sound consumer policy needs strong consumer representation at the various levels of policymaking. The identification and formulation of consumer interests cannot be left to other stakeholders. Together, all these measures should work in harmony to deliver outcomes that are beneficial to people and the economy as a whole. Economic policy is a means to an end, not an end in itself.

Consumer policy key to sustainable growth

Sustainability is about meeting the needs of today's generations without preventing future generations from meeting theirs. Sustainable growth therefore needs to be at the heart of policymaking.

We need to develop models of consumption that deliver more welfare to households without an obligatory increase in the current metrics of GDP and continued environmental damage, consumer indebtedness at home and subsistence labour abroad. These include models that use smart technologies (cloud computing); models that can reduce consumer vulnerability; and models of collective purchasing and collaborative consumption that reduce the need for producing more goods (car clubs, and refund schemes). These call for a new kind of smart, sustainable and inclusive consumer policy, with more focus on the use and service of products.

While the consumer movement has an important role to play in raising awareness, making sustainable consumer choices easier, and putting pressure on the supply-side of the market to deliver sustainable products and services, it is important not to make “consumer empowerment” an excuse for not taking much-needed political action; the key current concerns over climate, water scarcity and biodiversity involve difficult choices related to our food, housing and transport and cannot be addressed by consumer choices alone. EU consumer policy must tackle these difficult issues, and it must make the sustainable choice the cheapest and the easiest one, through a combination of “carrot and stick” measures for industry and consumers.

Further, the demographic challenge that Europe has to face, in the form of an increased ageing population, requires new types of products and services. An older population will have different levels and forms of vulnerability, and these must be taken into consideration when designing products and services and providing information.

Towards a future strategy

The acute consumer concerns highlighted by our member organisations are well documented and researched. And we realise that some of the problems listed above have been addressed in recent legislative and policy measures, such as the Third Energy Package and the Telecoms Reform Package or the more recent “flagship initiative” for a Resource Efficient Europe 2020. The impact of these is still to be felt and evaluated, on the basis of measurable outcomes for consumers. Many of the current challenges are going to be with us for years to come and will be exacerbated by continuous technological developments, the digitalisation of our daily lives, and the globalisation of our economies.

An EU consumer strategy must consider the impact of the recession, which has affected the welfare of consumers in key areas of everyday life, and has resulted in a rising number of vulnerable and disadvantaged people. It must be comprehensive and cut across all sectors within the EU portfolio of responsibilities, and should be coordinated with other key EU strategic initiatives and priorities, such as the Europe 2020 initiatives, with a clear consumer dimension, which is often missing or not sufficiently developed. We need a pan-EU visionary consumer policy strategy which includes all the market sectors relevant to consumers, as well as the cross-cutting issues of enforcement and redress. The strategy must address key concerns and identify consumers' future needs. It should not be limited to the current Commission's term of office, but must go beyond and provide guidance for the next decade. Finally, it must proceed in line with good governance principles.

Objectives for a 2020 strategy

Within the EU market economy, consumers must be given the right tools if they are to play their role of drivers of the market. They must be able to trust markets and have the skills and competencies to make the right choices. Their welfare, and that of future generations, should be at the centre of policymaking, providing them with affordable prices for all life's essentials, as well as safe and sustainable products and services, and access to effective redress in case of market dysfunction.

To meet the ambitious goals of smart, sustainable and inclusive growth, we have identified the following objectives that we consider to be achievable by 2020 through an ambitious EU consumer policy that can be embedded into Europe 2020 priorities. These objectives have to be set across consumer services and products markets and sectors. To ensure they are met, measurable targets and key performance indicators must also be created, and BEUC is ready to collaborate here.

The objectives below are not exhaustive, but aim to provide orientation for identifying and addressing the major challenges ahead and for setting up a modern, ambitious and efficient EU consumer policy strategy to these ends:

Consumers have straightforward, meaningful choices in fair and competitive markets and can exercise them

- *Establish tools to ensure proactive implementation of competition and consumer protection policies and swift action by regulators and enforcement authorities against misleading and unfair practices.*
- *Make strategic use of available research data to anticipate and prevent consumer detriment, rather than having to cure it.*

- *Make use of research data also to develop a member states ranking system for their implementation of consumer policy.*
- *Ensure that any new or revised regulation is focused on consumers, based on robust, independent evidence and provides essential safeguards for vulnerable people.*
- *Ensure that where industry is entrusted with self-regulatory initiatives, a monitoring and reporting system is established to allow the legislator to swiftly intervene in case of self-regulatory failure, based on concrete indicators defined when the self-regulation was adopted.*

Consumers get access to and better value from all goods and services

- *Ensure that all EU consumers have access to safe, affordable and healthy food, produced in a sustainable way.*
- *Require that all EU consumers have access to a basic financial service.*
- *Extend access for all EU consumers to very fast broadband telecoms networks and improve the reach of existing technologies.*
- *Embed a “design for all” principle into all products and related information, to ensure they are fully accessible by people with disabilities.*
- *Ensure that energy is affordable for all by designing consumer-oriented retail market and energy efficiency policies.*
- *Guarantee that all consumers have access to safe and innovative health products and services.*

Consumers benefit fully and safely from advances in technology

- *Ensure product safety through promoting ambitious safety standards and efficient market controls to ensure an internationally level playing field.*
- *Ensure that advances in technology improve consumers’ standards of living, respond to their needs and expectations and take account of the maturing society.*
- *Define an efficient, transparent and robust regulatory framework that is futureproof.*
- *Involve consumers in research and development processes to make sure that advances in technology are demand-driven, consumer-centred and accepted for use.*
- *Require that all digital communication tools have integrated privacy by design.*
- *Mandate default rules that are most favourable to privacy and consumer protection.*
- *Ensure that all EU consumers benefit from a neutral internet, where they are able to access, use, send, post, receive, or offer any content, application, or service of their choice irrespective of source or target, while respecting existing laws on e-commerce and intellectual property.*

- *Establish a forward-looking and balanced copyright framework, by creating a clear set of mandatory consumer rights for lawful use throughout the EU.*

Consumers have access to impartial information and advice, and acquire the knowledge to exercise their rights

- *Guarantee that information provided to consumers on goods and services is easily accessible, clear, unbiased, accurate, up-to-date, based on independent evidence and easy to compare with similar products or services.*
- *Encourage effective consumer education as part of the curriculum in EU primary and secondary schools, either standalone or as part of a wider citizenship education programme.*
- *Devise policy approaches that seek to reduce the complexity of products and services for consumers, keeping in mind consumer expectations and behaviour.*
- *Test information with the people who have to use it, on a regular basis.*

Consumers benefit from efficient enforcement and are given adequate tools to obtain redress

- *Ensure that, through training programmes and relevant information, traders are increasingly aware of consumer rights and respect them when designing their standard contracts and preparing their marketing tools.*
- *Mandate that all EU consumers benefit from an effective EU-wide collective judicial redress, to prevent and compensate harm, both at national and cross-border level and for the whole range of rights that they have in law.*
- *Equally require that all market sectors provide for independent and effective systems of alternative dispute resolution that are also open to cross-border litigation.*
- *Ensure that in all product and service sectors, national enforcement authorities can take effective and dissuasive actions against all infringements of consumer rights, and especially against unfair contract terms and unfair commercial practices.*
- *Encourage national enforcement authorities to work closely together, as well as with consumer organisations, to close any enforcement gaps that could arise within the EU.*

Consumers find sustainable choices to be the easy and affordable ones

- *Ensure that consumers benefit from a wide choice of sustainable products and services at affordable prices.*

- *Guarantee that consumers are not exposed, directly or indirectly to hazardous chemicals.*
- *Mandate EU standards to ensure that social and environmental factors are taken into account when designing a product and during its life-cycle.*
- *Continue with market policies that result in the removal of less sustainable products from markets, and their replacement with resource efficient alternatives.*
- *Ensure that all products and services are labelled with transparent, accurate and comparable sustainability information, while green claims are evidence-based and misleading claims are proactively sanctioned.*

Consumers trust that EU policymaking fully takes account of their interests

- *Proactively consider and use research data on consumer markets and consumer behaviour in EU policy and decision-making across all sectors.*
- *Ensure that all proposals for EU legislation which have an impact on consumer wellbeing provide for a consumer impact assessment, based on consultation with consumer representatives.*
- *Provide for a balanced representation of different stakeholders in all EU expert groups and make it possible for consumer representatives to influence their decisions.*
- *Make certain that all EU legislation with an impact on consumers' welfare is based on a high level of consumer protection, meets the needs and expectations of European consumers and is efficient.*
- *Provide for an obligation on EU institutions to demonstrate integration of consumer policy into other policies through regular publicly available reports.*

Consumers benefit from a strong and influential consumer movement at national and at EU level

- *Formally recognise and support the importance of a strong and well-resourced consumer movement, both at national and at EU level.*
- *Identify more sustainable models of funding European and national consumer organisations and facilitate their implementation.*
- *Include consumer representation at EU and at national level as a horizontal policy objective in all the EU consumer policy financial programmes, and ensure that significant funds are allocated for this purpose.*
- *Provide specific funding and capacity building for consumer organisations and consumer policy in the CESEE countries, taking account of the need for continuous updating of their capacities, as a response to market and social developments.*