

## CCIA Europe's Feedback to Public Consultation

# Consumer Agenda 2025-2030 and Action Plan on Consumers in the Single Market

August 2025

The Computer & Communications Industry Association (CCIA Europe) is pleased to contribute to the European Commission's public consultation on its new consumer policy strategy.

The Association believes that empowering consumers and strengthening enforcement capabilities will be vital to ensuring that consumers can fully benefit from the Single Market. In this respect, the upcoming Consumer Agenda offers an opportunity to build on the progress already made and address emerging challenges. This should be done in a way that empowers consumers and provides legal certainty for businesses operating across the EU.

As the Commission develops its shared vision and common framework for consumer policy until 2030, CCIA Europe respectfully offers the following feedback. We have highlighted key areas where the Consumer Agenda can strengthen consumer rights while improving legal certainty.

- I. Enhance effective and coordinated enforcement
- II. Advance legal coherence and regulatory simplification
- III. Empower consumers and improve digital literacy
- IV. Align consumer information requirements with digital and green transitions

## I. Enhance effective and coordinated enforcement

Effective enforcement of consumer rules is crucial for guaranteeing European consumers an adequate level of protection in their online interactions. CCIA Europe supports the Commission's aim to strengthen the protection of consumers and promote their well-being. To achieve these goals, the Consumer Agenda 2025-2030 should concentrate on developing a harmonised legislative framework that provides clarity and predictability for businesses, while effectively safeguarding consumer rights at the same time.

The first step should be to leverage existing tools. The European Union already has a robust legislative framework that is fit for the digital economy in place. Before introducing new obligations, the Commission must prioritise using the tools already available within legislation like the Digital Services Act (DSA),<sup>1</sup> the General Product Safety Regulation (GPSR),<sup>2</sup> and the Foreign Subsidies Regulation.<sup>3</sup> It should also strengthen the Consumer

<sup>1</sup> Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act), available here: <https://eur-lex.europa.eu/eli/reg/2022/2065/oj>

<sup>2</sup> Regulation (EU) 2023/988 of the European Parliament and of the Council of 10 May 2023 on general product safety, available here: <https://eur-lex.europa.eu/eli/reg/2023/988/oj>

<sup>3</sup> Regulation (EU) 2022/2560 of the European Parliament and of the Council of 14 December 2022 on foreign subsidies distorting the internal market, available here: <https://eur-lex.europa.eu/eli/reg/2022/2560/oj>

Protection Cooperation (CPC) network and cooperation within it.<sup>4</sup> Following the 2022 public consultation on strengthened enforcement cooperation,<sup>5</sup> and given the CPC network's proven ability to quickly and effectively address cross-border infringements, the Commission should start promoting enhanced enforcement action, particularly against non-compliant actors. There is no need for the Commission to wait for further legislative tools; action should be taken now.

The current EU legal framework is already comprehensive, and its full implementation and consistent application should take priority over creating more laws. This will ensure legal certainty and prevent regulatory fragmentation. For example, the DSA already tackles several harmful practices by online platforms and provides a clear framework for platform transparency and adequate consumer redress.

To enhance enforcement and guarantee effectiveness, the Commission should consider developing and scaling AI-based tools that can assist with the proactive detection of systematic abuses. A good example is the AI-based software developed by Poland's consumer authority (UoKiK), called ARBUZ, to detect illegal clauses in business-to-consumer template agreements.<sup>6</sup> Tools like this should also be shared and adapted across Member States to ensure consistency.

Enforcement efforts will also become more effective and targeted if dialogue between regulators and industry is further intensified. A way forward could be to formalise structured stakeholder consultation in cross-border CPC proceedings. This would ensure that practical insights and potential market impacts are adequately considered and integrated into enforcement efforts.

CCIA Europe notes that the current fragmentation in actions undertaken by the CPC network reduces predictability in enforcement and risks creating a patchwork of rules that undermine the Single Market. In this context, strengthening the role of the Commission in coordinating joint actions and improving transparency around the CPC's priorities could help achieve greater legal clarity and create a level playing field in enforcement.

## II. Advance legal coherence and regulatory simplification

The forthcoming Consumer Agenda must be guided by the principles of enhancing legal clarity and promoting technological neutrality as a way to preserve Europe's competitiveness and innovation edge.

In this context, avoiding regulatory overlap and reducing the administrative burden should be a key objective for any upcoming initiatives under the Agenda. The EU currently has

<sup>4</sup> Through the updated Consumer Protection Cooperation Regulation (EU) 2017/2394, national authorities are empowered to detect irregularities and take speedy action against rogue traders. Regulation (EU) 2017/2394 of the European Parliament and of the Council of 12 December 2017 on cooperation between national authorities responsible for the enforcement of consumer protection laws, available here:

<https://eur-lex.europa.eu/eli/reg/2017/2394/oj>

<sup>5</sup> European Commission's public consultation on consumer protection - strengthened enforcement cooperation, open from 28 September 2022 to 21 December 2022, available here:

[https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13535-Consumer-protection-strengthened-enforcement-cooperation\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13535-Consumer-protection-strengthened-enforcement-cooperation_en)

<sup>6</sup> Poland's Office of Competition and Consumer Protection (UoKiK)'s White Paper on 'Advancing Consumer Law Enforcement with Artificial Intelligence', available here: <https://uokik.gov.pl/Download/617>

around 100 tech-focused EU laws, and over 270 regulators active in digital networks across all Member States.<sup>7</sup>

This rapid increase in tech legislation has resulted in a challenging regulatory environment with significant overlaps and inconsistencies across key legal instruments. Those instruments include the General Data Protection Regulation (GDPR),<sup>8</sup> the Digital Services Act (DSA), Digital Markets Act (DMA),<sup>9</sup> the Unfair Commercial Practices Directive (UCPD),<sup>10</sup> the Consumer Rights Directive (CRD),<sup>11</sup> and the Artificial Intelligence Act (AI Act).<sup>12</sup>

In fact, many of the concerns raised in the call for evidence (e.g. dark patterns, misleading practices by influencers, or addictive design) are already addressed by existing legislative instruments such as the DSA, the GDPR, and the UCPD – as well as in guidance from both the Commission and the European Data Protection Board (EDPB).<sup>13</sup>

Furthermore, Member States' implementation of EU legislation has already shown to lead to overlapping or differing compliance requirements across the EU, which increases the administrative burden on traders. This hinders the further harmonisation of the Digital Single Market, creating a confusing patchwork of rules for businesses and consumers alike. Therefore, any additional initiatives should first of all be carefully scoped in order to avoid creating conflicting obligations and legal uncertainty, particularly for small and medium enterprises (SMEs) and start-ups.<sup>14</sup> The new Consumer Agenda should also align with the Commission's overall emphasis on simplification and enhancing competitiveness.

<sup>7</sup> The Draghi report on EU Competitiveness - 'The Future of European Competitiveness. Part A: A competitiveness strategy for Europe', September 2024, available here:

[https://commission.europa.eu/document/download/97e481fd-2dc3-412d-be4c-f152a8232961\\_en?filename=The%20future%20of%20European%20competitiveness%20\\_%20A%20competitiveness%20strategy%20for%20Europe.pdf](https://commission.europa.eu/document/download/97e481fd-2dc3-412d-be4c-f152a8232961_en?filename=The%20future%20of%20European%20competitiveness%20_%20A%20competitiveness%20strategy%20for%20Europe.pdf)

<sup>8</sup> Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), available here:

<https://eur-lex.europa.eu/eli/reg/2016/679/oi>

<sup>9</sup> Regulation (EU) 2022/1925 of the European Parliament and of the Council of 14 September 2022 on contestable and fair markets in the digital sector (Digital Markets Act), available here:

<https://eur-lex.europa.eu/eli/reg/2022/1925/oi/eng>

<sup>10</sup> Directive 2005/29/EC concerning unfair business-to-consumer commercial practices in the internal market ('Unfair Commercial Practices Directive'), available here: <https://eur-lex.europa.eu/eli/dir/2005/29/oi/eng>

<sup>11</sup> Directive 2011/83/EU of the European Parliament and of the Council of 25 October 2011 on consumer rights (Consumer Rights Directive), available here: <https://eur-lex.europa.eu/eli/dir/2011/83/oi/eng>

<sup>12</sup> Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence (Artificial Intelligence Act), available here:

<https://eur-lex.europa.eu/eli/reg/2024/1689/oi/eng>

<sup>13</sup> Commission notice - guidance on the interpretation and application of Directive 2005/29/EC of the European Parliament and of the Council concerning unfair business-to-consumer commercial practices in the internal market, available here:

[https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=uriserv:OJ.C\\_.2021.526.01.0001.01.ENG#20:%7E:text=3\\_%C2%A0%C2%A0%C2%A0BLACK%20LIST%20OF%20COMMERCIAL%20PRACTICES%20\(ANNEX%20I\);](https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=uriserv:OJ.C_.2021.526.01.0001.01.ENG#20:%7E:text=3_%C2%A0%C2%A0%C2%A0BLACK%20LIST%20OF%20COMMERCIAL%20PRACTICES%20(ANNEX%20I);)

Guidelines 3/2022, on Dark patterns in social media platform interfaces: How to recognise and avoid them, 02 May 2022. Available here:

[https://www.edpb.europa.eu/our-work-tools/documents/public-consultations/2022/guidelines-32022-dark-patterns-social-media\\_en](https://www.edpb.europa.eu/our-work-tools/documents/public-consultations/2022/guidelines-32022-dark-patterns-social-media_en)

<sup>14</sup> DisCo - Disruptive Competition Project, Dark Patterns: Four Key Principles the EU Must Get Right, 25 May 2022, available here:

<https://project-disco.org/european-union/052522-dark-patterns-four-key-principles-the-eu-must-get-right/>

The Commission should also be mindful about respecting technological and channel neutrality. The primary focus of any initiatives should be on setting clear objectives and then allowing flexibility in how online services achieve these goals, especially given the variety of online services that are consumer facing. This means that instead of prescribing specific technological solutions, the Commission should remain principle-based, setting clear aims it wishes to achieve and avoiding prescriptive approaches that hinder neutral implementation.

Instead of adding new layers of obligations, CCIA Europe believes that the Commission should provide further guidance on how existing rules do in fact also apply to new digital practices. This guidance should be based on challenges identified through ongoing dialogue with various stakeholders and industry players. Such a coherent and harmonised legal environment will increase trust and reduce costs for both consumers and businesses.

### **III. Empower consumers and improve digital literacy**

Empowering consumers is key to driving economic growth, innovation, and sustainability across the European Union in the future. This requires a whole-of-society approach that includes increasing investment in education and media literacy, and providing European consumers with the right tools to navigate a constantly evolving digital environment.

Education and digital literacy campaigns should be tailored to the various skill levels and demographic groups to ensure all types of consumers across the EU are adequately covered. Particular attention should also be paid to vulnerable consumers, such as older people and young users of online services, who may have more specific needs in terms of literacy.

As part of these literacy campaigns, establishing structured feedback loops with providers of online services will help EU policymakers better understand emerging trends and risks. It will also allow online services to contribute to the solutions, as they are key players in the consumer journey.

CCIA Europe would also support exploring targeted fiscal incentives to increase affordability of sustainable, refurbished, or second-hand products. This would help to reduce the environmental impact, while still upholding strong consumer protection standards. Such measures would strengthen consumers' purchasing power and help them prioritise long-term value and reliability over short-term costs.

### **IV. Align consumer information requirements with digital and green transitions**

CCIA Europe agrees with the Commission that consumers must be empowered to make well-informed choices. However, for this to happen, the EU regulatory framework for consumer information must evolve in line with how consumers interact with businesses today: through digital channels, online marketplaces, and cross-border e-commerce platforms.

In this context, product information requirements need to be modernised. Current disclosure obligations are often very complex, detailed and poorly adapted to digitised and platform-based commerce. A thorough review and simplification of these requirements

would ensure they remain effective, contextually relevant, and adaptable to new and evolving digital formats.

Consumers should also have easy access to reliable, comparable, and accessible information on the environmental impact of products. CCIA Europe believes this can be achieved through harmonised labelling at EU level, voluntary schemes, and smart disclosures – rather than opting for the introduction of additional rigid obligations that risk consumer information fatigue.

To guarantee access to product information (including sustainability, repairability, and safety) digital means of retrieving and delivering this information should become the norm. All digital formats – including, but not limited to, QR codes, barcodes, radio frequency identification (RFID), and smart labels – should be considered as full-fledged alternatives to printed formats. Once operational, and if developed with the businesses' needs in mind, the Digital Product Passport (DPP) may also contribute to this effort.<sup>15</sup>

## Conclusion

The Consumer Agenda 2025-2030 offers an opportunity to reaffirm Europe's commitment to consumer protection amid the ongoing digital and environmental transformations. However, the Agenda's success will depend on finding an adequate balance between protection and innovation, legal coherence and flexibility, and enforcement and stakeholder dialogue.

CCIA Europe actively supports the Commission's goal of enhancing consumer protection. The Association believes that by taking existing legislative tools into due consideration, the EU can continue to advance a regulatory framework that ensures legal certainty for businesses of all sizes, while championing innovation and empowering European consumers. We stand ready to continue supporting the Commission in shaping and implementing a forward-looking consumer policy framework that is based on evidence and enhances Europe's global competitiveness.

## About CCIA Europe

The Computer & Communications Industry Association (CCIA) is an international, not-for-profit association representing a broad cross section of computer, communications, and internet industry firms.

As an advocate for a thriving European digital economy, CCIA Europe has been actively contributing to EU policy making since 2009. CCIA's Brussels-based team seeks to improve understanding of our industry and share the tech sector's collective expertise, with a view to fostering balanced and well-informed policy making in Europe.

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<sup>15</sup> EU's Digital Product Passport: Advancing transparency and sustainability. European Commission, 2024: <https://data.europa.eu/en/news-events/news/eus-digital-product-passport-advancing-transparency-and-sustainability>

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