

ÖRAK-Stellungnahme zur öffentlichen Konsultation der Europäischen Kommission „Verbraucheragenda 2025-2030 und Aktionsplan für Verbraucherinnen und Verbraucher im Binnenmarkt“

1. Priority areas

1.1. How would you rate the following proposed priorities?

	Not important	Somewhat important	Important	Very important	Don't know / Prefer not to say
Reducing administrative burdens for businesses	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Promoting sustainable consumption	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strengthening consumer protection in the online environment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring consumers can fully enjoy all benefits of the Single Market, for example by removing remaining barriers preventing consumers from buying goods and services across borders	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improving enforcement of consumer- protection and product-safety rules	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Protecting vulnerable consumers, especially children and young people	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting active governance and stakeholder cooperation in the EU and internationally	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

1.2. Are there other priority areas that you think are missing in the above? If yes, please specify:

350 character(s) maximum

Deregulierung im Bereich des Binnenmarkts für Waren, Förderung der Selbstverantwortung im Bereich des Binnenmarkts für Waren

2. Completing the Single Market for consumers

2.1. Which obstacles do you think most prevent consumers from enjoying all benefits of the Single Market?

Maximum 5 selection(s)

- ☐ Limited availability of cross-border consumer services, such as financial services
- ☐ Differences in consumer-protection rules across Member States
- ☐ Geo-blocking practices and restrictions on cross-border online services
- ☒ Insufficient information on and awareness of consumers' rights
- ☒ Lack of confidence in consumer rights being upheld when buying from another Member State or from outside the EU
- ☐ Lack of confidence in the safety of consumer products sold in the Single Market
- ☐ Business-to-business practices that restrict territorial distribution and sale of goods, limiting consumer choice and contributing to price differences between Member States [1]
- ☐ Insufficient access to cross-border redress mechanisms if something goes wrong





Other

[1] Territorial supply constraints, for example, when a manufacturer forces a retailer to source its products from a specific EU country.

3. Enforcement of consumer-protection rules and e-commerce

3.1. What do you think are the most important issues to tackle at EU level over the next five years to strengthen the enforcement of consumer- protection rules?

Maximum 5 selection(s)



Lack of compliance with consumer-protection and product-safety rules, especially in the e-commerce sector and with regard to traders and products coming from outside the EU



Limited awareness among consumers of their legal rights



Limited awareness among businesses of their legal obligations



Complex coordination among relevant enforcement authorities to tackle infringements, sometimes leading to slow and insufficiently deterrent enforcement action against non-compliant traders



Limited access to effective out-of-court dispute resolution mechanisms for consumers



Limited powers and resources of public enforcement bodies, at both EU and Member State level



Limited capacity and resources of private enforcement organisations supporting consumers



Other

[1] [Consumer reports show the need for strengthened enforcement at EU level - European Commission](#)

[2] [E-commerce communication: A comprehensive EU toolbox for safe and sustainable e-commerce - European Commission](#)

4. Consumer protection in the online environment

4.1. In addition to improving enforcement of consumer-protection and product-safety rules, e.g. to address unfair commercial practices and online sales of unsafe products, what do you think are the most important issues to tackle at EU level in the next five years to strengthen online consumer protection?

Maximum 7 selection(s)

- ☐ Protecting children and young people as online consumers
- ☐ Dark patterns (deceptive design) in online interfaces (e.g. misleading presentation of choice buttons)
- ☐ Influencer marketing (e.g. lack of disclosure of commercial content)
- ☐ Addictive design features of digital services (e.g. 'infinite scroll')
- ☐ Unfair personalisation practices (e.g. online advertising targeting consumer vulnerabilities)
- ☐ Digital subscription management (e.g. difficult cancellation process of online contracts, unwanted automatic contract extension or conversion of free trials into paid contracts)
- ☐ Problematic practices with in-app (in-game) purchases (e.g. obscuring their value using virtual currencies or offering gambling-simulating features – 'loot boxes')
- ☐ Misleading pricing practices, e.g. 'drip' pricing (the full price including unavoidable charges is not displayed up front), 'dynamic' pricing (instant adjustment of the price in line with market demand), misleading price comparisons
- ☐ Safety risks in new technology products (e.g. impact of digitally connected products on mental health due to addiction, increased stress and anxiety)
- ☒ Online fraud and scams, such as fake online shops
- ☐ Other

5. Sustainable consumption

5.1. What do you think are the most important issues to tackle at EU level over the next five years to promote more sustainable consumption?

Maximum 5 selection(s)

- ☐ Limited access to affordable sustainable goods and services
- ☐ Environmental impact of e-commerce (default delivery options, option of renting vs buying, etc.)
- ☒ Surge in e-commerce imports from non-EU countries
- ☐ Unsustainable business models that encourage overconsumption (e.g. ultra-fast fashion, single parcel shipping)
- ☐ Complex or misleading sustainability information, labels and green claims
- ☐ Difficulty in designing and sustaining circular business models
- ☐ Lack of consumer trust in circular business models (e.g. due to concerns about the safety of used or refurbished products, or the level of consumer protection)
- ☐ Availability and affordability of repair services
- ☐ Other

6. Protecting vulnerable consumers

6.1. What do you think are the most important issues to tackle at EU level over the next five years regarding the protection of vulnerable consumers?

Maximum 5 selection(s)

- ☐ Accessibility and affordability of basic consumer goods and services, including offline access to essential services
- ☐ Unfair commercial practices that target consumer vulnerabilities
- ☐ Aggressive marketing practices targeting children and young people



- ☐ Complexity of information provided to consumers (including on bills, such as energy or telecoms) and of redress mechanisms
- ☐ Limited digital literacy and access to digital services and information
- ☐ Limited financial literacy and access to financial services
- ☐ Difficulties in safely using consumer products, for example new technology products
- ☐ Insufficient availability of consumer advice and support networks
- ☐ Other

7. Administrative burden and simplification

7.1. What do you think are the most important measures to take at EU level in the area of consumer policy over the next five years to reduce the administrative burden on businesses?

Maximum 5 selection(s)

- ☒ More coherent, effective and efficient enforcement of consumer-protection rules
- ☐ Improve business feedback mechanisms to enable continuous assessment of the impact of regulatory obligations
- ☒ More efficient and swifter administrative cooperation between Member State authorities
- ☒ Simplification of certain specific legal requirements, such as those identified in the Digital Fairness Fitness Check [1]
- ☐ Further harmonisation of consumer-protection rules
- ☒ Clearer legal guidance to facilitate business compliance
- ☐ Test new approaches to consumer information requirements, including the use of digital information
- ☐ Support capacity building and legal advice services to facilitate business compliance
- ☐ Other



[1] [Commission Staff Working Document SWD\(2024\) 230 - Fitness Check on EU consumer law on digital fairness.](#)

8. Supporting documents and general comments

Please upload any supporting documents, such as position papers, that you may wish to attach to your response or add below any general comments you may have.

750 character(s) maximum

- Die größte Herausforderung der Zukunft wird der Online-Handel darstellen, insbesondere betreffend Sicherheit (gegen Betrug etc), aber auch betreffend die Verwendung der persönlichen Daten.
- Die Eigenverantwortung der Verbraucher soll gestärkt werden, es sollte vermieden werden, diese zu stark zu bevormunden.
- Deregulierung, Verwaltungsvereinfachung senken Kosten und kommen damit indirekt den Verbrauchern zugute.
- Eine gut funktionierende, nicht zu teure Justiz (Gerichtsgebühren!) hilft, Verbraucherrechte effektiv durchzusetzen. - Schutz der Jugend durch bessere Aufklärung / Schulbildung.

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