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Advancing Consumer Protection for the New EU Consumer Agenda

Position Paper



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Introduction

The European Consumer Centres Network (ECC-Net), through its daily assistance to consumers and data collection across EU countries, has a unique vantage point on recurrent and emerging challenges as well as gaps in consumer protection. In the lead-up to the European Commission's 2025–2030 Consumer Agenda, ECC-Net welcomes the Commission's focus on issues linked to digital fairness, cross-border e-commerce, and enforcement. This policy paper gathers insights from ECC-Net's case handling experience and recent position papers. Our aim is to inspire, based on a few yet not exhaustive examples, an ambitious Consumer Agenda as well as the Digital Fairness Act which address real problems consumers face today, **same old issues that persist and new ones that arose with digitalisation – from unfair airline refund practices to manipulative online design – with practical solutions.**

Strengthening Consumer Rights in Traditional and Persistent Problem Areas



Air Travel and Multimodal Transport

Complaints handled by ECC-Net reveal persistent issues in passenger transport, especially air travel. Consumers still struggle with unclear responsibilities and “ping-pong” between airlines and ticket intermediaries when flights are delayed or cancelled. ECC-Net has recently published a detailed policy paper listing all the air passenger issues identified in case handling. <https://www.eccnet.eu/publication/towards-more-effective-air-passenger-rights-regulation> ECC-Net wishes that the Institutions will soon finalize the revision of Regulation 261/2004 on air passenger rights. A comprehensive revision that prioritizes transparency and care, addressing challenges like flight disruptions and airline bankruptcies.

ECC-Net has also provided input to DG Move on other passenger rights regulation which should be addressed when revising the train, bus and coach as well as maritim passenger rights.

Car rental

Another area of concern is car rentals, which ECC-Net views as a “wild west” due to the lack of specific EU rules governing the sector and contractual clauses governing the unbalanced relationship between consumers and traders. Consumers frequently report problems such as unreasonably high damage charges, surprise fees, or disputes about the condition of the vehicle. A particularly unfair practice is contract terms that lead to consumers losing both the car and their payment due to delayed pick-up — even when the delay is caused by the car rental company’s own contractual partner, such as an airline. These clauses shift all risk to the consumer and leave no room for reasonable exceptions. And the biggest issue in these cases is often the lack of proof that can be provided by the consumer as the issues often relate to things that are said or things that never happened according to the consumer.

After having tried cooperation on codes of conduct and industry guidelines — which only major players implement for their high-end brands — ECC-Net recommends developing an EU-wide framework for car rentals to introduce basic fairness and transparency obligations. For instance, rental companies should be obliged to conduct vehicle inspections in the presence of the consumer at pick-up and drop-off; if no joint inspection is done, any subsequent damage claim by the company should be presumed invalid. Traders must obtain the customer’s explicit written consent for any extra charges at the counter — no more blank-slate credit card holds without explanation. All charges and insurance options should be clearly presented and agreed in writing, and consumers should always receive a physical or digital copy of the rental contract. Such measures would curb abuses like undocumented damage claims and bring consistency to car rental practices across the Single Market. ECC-Net has recently published a detailed paper on all car rental issues identified by the Network.

Tackling Digital Risks, E-Commerce Challenges, and Financial Fraud



Combatting Dark Patterns and Unfair Online Practices

As markets digitalise, ECC-Net sees a surge of consumer complaints about manipulative website and app designs. The Commission's planned Digital Fairness Act acknowledges the high impact on consumers of strong marketing techniques like **dark patterns**, misleading influencer marketing, and addictive app features as key targets. ECC-Net fully supports this direction and urges that specific unfair digital practices be explicitly prohibited in EU consumer law. These deceptive design techniques (pre-checked boxes, confusing interface flows, hidden opt-outs, unclear confirmation buttons etc.) are increasingly used to nudge consumers into choices they might not otherwise make. We recommend amending the Unfair Commercial Practices Directive (UCPD) to blacklist certain common dark patterns in its Annex I. For example, practices such as deliberately complicating the process of cancelling a subscription or increasing prices at the last moment during a checkout ("drip pricing" or **dynamic pricing** that surprises the consumer just as they are about to pay) should be regulated as unfair practices. ECC-Net's experience shows instances of online retailers raising prices or adding unexpected fees when the consumer is already at the payment stage – a tactic that exploits the

consumer's commitment to the purchase. This should be clearly prohibited. Likewise, data-driven **personalised pricing or targeting** that is opaque to the user can be detrimental; if personalization of offers or prices is not fully transparent to the consumer, it should not be allowed. Consumers have a right to know when they are being steered by an algorithm and on what basis – otherwise, such personalized commercial practices undermine informed choice.

The upcoming legislation should be future proof and already have in mind developments such as social commerce, superapps and e-commerce platforms combining different retail areas. Superapps are multifunctional digital platforms that integrate various services into a single app — such as messaging, shopping, payments, travel bookings, and more — allowing companies to collect vast amounts of consumer data and influence behavior across multiple areas of a user's digital life. Their growing dominance raises new consumer protection challenges, as they often blur the boundaries between services, limit transparency, and make it harder for users to detect unfair practices or exercise informed choice.

One recurring issue identified by ECC-Net is the deceptive design and use of landing pages in online commerce. Consumers are often directed to landing pages via search engines or sponsored ads that mimic the appearance of official or well-known retailers, but which in fact belong to unrelated or unauthorised sellers. These pages may use misleading branding, suggest affiliations that do not exist, or obscure the true identity of the trader. Some are even fully fraudulent usurpation of identity.

This issue, combined with the rise of business practices such as dropshipping where often traders do not indicate their real names, location and hide their webpage registration, leads to consumers being misled at the very start of their transaction journey, frequently placing trust in a trader or service under false pretences. Even if the current regulatory framework does address this early-stage deception, enforcement remains fragmented. ECC-Net recommends that future EU consumer legislation, including updates to the Unfair Commercial Practices Directive, clearly prohibit the use of misleading landing page practices and impose a duty of transparency from the very first point of consumer interaction—especially where sponsored content or paid placement is involved, or traders use infrastructures in third countries. Strengthening oversight of online advertising ecosystems and ensuring that platforms take responsibility for misleading commercial content would help restore consumer trust in digital marketplaces.

The complex issue for ECCs is to enter in a legal discussion on the fairness of a website. While we have a lot of consumers complaining they entered unwillingly into contract with that webshop, it can be a legal discussion or a discussion on customer journey, but the amount of cases should count to give enforcement powers to CPC's to put a webshop offline or temporarily on hold until the webshop provides the necessary proof.

Subscription Traps and Cancellation Rights

ECC-Net continues to receive many complaints about so-called “subscription traps” – situations where consumers are lured into recurring subscriptions (often via a free trial or a low-cost introductory offer) and then find it difficult to cancel in time. A typical example is a free trial for a service that automatically converts into a paid subscription or misleading offers on social media directing to non official pages of short existence that make forensic evidence difficult; consumers may not realize the trial’s conditions, or they attempt to cancel but cannot easily reach the trader. To address this, we urge the introduction of **simple, two maximum three-click cancellation mechanisms** for any online subscription, mirroring the best practices already legislated in some Member States. For instance, France and Germany’s recent law requires a clear “cancel button” on websites that allow subscription sign-ups, enabling consumers to terminate contracts just as easily as they entered them. Under French law on automatic renewal, «Châtel» law, consumer must be informed 1 to 3 months before the renewal date of the forthcoming renewal of the contract and of the cancellation modalities by a letter or a dedicated e-mail.

This is a French specificity that is often misunderstood and forgotten by sites based in other European countries. ECC-Net would very much welcome EU harmonisation on these matters, including the protection of consumers by a reversal of the burden of proof. **This would mean that if a trader cannot demonstrate that it has clearly informed the consumer about the subscription conditions, renewal, and cancellation options, the contract should not bind the consumer.** In other words, the default assumption should favour the consumer in disputes about consent or contract validity. Embedding this principle at the EU level would significantly reduce friction for consumers and prevent exploitative retention tactics, while incentivizing traders to maintain transparent and verifiable communication.

Additionally, consumer law should clarify the right of withdrawal in cases of free trials that transition to paid contracts. Currently, there is ambiguity about when the 14-day withdrawal period under the Consumer Rights Directive starts if a digital service began as a free trial. ECC-Net suggests that for free-to-paid conversions, the withdrawal right should be counted from the moment the consumer is first charged (i.e. when the contract becomes a paying one), not the start of the trial. This would give consumers a fair chance to evaluate the service once payment kicks in, rather than losing their withdrawal window during a free period. More broadly, traders should be obliged to remind consumers before a free trial ends and a payment obligation begins – an ounce of transparency that would prevent many disputes. Also many of these subscription traps in generally come with an „immediate service” such as access to a customer area, a standard document available to consumers etc. enabling traders to exclude the right of withdrawal if the consumer gave explicit consent. However, ECC-Net has seen many variations where the explicit consent is questionable and harmonised enforcement across the EU absolutely necessary.

Protecting Vulnerable Consumers and Minors Online

While the development of the digital environment is not easy to follow for a lot of consumers, the group of vulnerable consumers has increased a lot in the last years. All consumers could be considered vulnerable due to access and techniques used.

A particular group, however that requires even more attention, are children and teenagers. In practice, this could mean requiring stronger default safeguards for services likely to be used by minors or vulnerable consumers. We welcome the Commission's current emphasis on making the digital world safer for young consumers. Concretely, ECC-Net proposes to curb **addictive design features** – for example, endless scrolling, autoplay videos, gamified shopping rewards – especially but not only where these target minors. Digital services should offer an **opt-out option** for such features, or refrain from deploying them by default. In online games and apps popular with children, special care is needed around in-app purchases and virtual currencies. ECC-Net suggests requiring full transparency about the real-money cost of any "virtual currency" (such as gaming gems or tokens) to avoid misleading minors about the value of their purchases. Moreover, games directed at minors should not monetize via opaque virtual currencies at all – young consumers are particularly prone to overspending when currency abstractions cloud the real cost. We support a prohibition on manipulative in-game sales tactics that push minors to make purchases, and recommend that **online games** be examined holistically for consumer risks. If necessary, a dedicated regulatory framework should be developed to address issues like loot boxes, pay-to-win schemes, and other practices in the gaming sector that can be harmful or exploitative or these issues should be addressed under the Digital Fairness Act.

Finally, ensuring that **automated online interactions** (like chatbot customer service or AI-based "digital assistants") do not become barriers for more vulnerable consumers is key. Companies deploying AI chatbots should be required to clearly inform users that they are interacting with a machine and must provide an easy path to reach a human agent. ECC-Net has seen many cases where consumers, especially those less techsavvy, hit a dead end with unhelpful chatbot responses and no human intervention available. The upcoming agenda should enforce a "human in the loop" principle: no consumer should be left without real human customer support when needed, regardless of automation.

Influencer Marketing and Consumer Trust

The rise of social media influencers as a marketing channel has introduced new risks of misleading advertising, covert promotions, and even fraud targeting consumers. Influencers can reach millions of followers, often blurring the line between personal advice and paid advertisement. ECC-Net believes it is time for EU-level rules to **regulate influencer marketing practices** in order to protect consumers. We note that France has recently pioneered legislation to rein in influencer abuses – for example, prohibiting certain promotions (like cosmetic surgery and high-risk financial products), requiring clear disclosure of sponsored content, and even mandating that influencers based outside the EU appoint a legal representative within the EU. The French law also defines “influencer” in legal terms and makes both the influencer and the brand jointly responsible for compliance. ECC-Net recommends that the EU follows this model: introduce a definition of “influencer marketing” into the Unfair Commercial Practices framework and extend liability to all actors involved (the influencer, any talent agencies or intermediary, and the advertiser/brand) for ensuring that promotions are truthful and compliant. Consumers should be clearly informed when content is sponsored or retouched, and unfair practices – such as influencers making fraudulent claims for products – must be enforceable under consumer law. By incorporating these provisions into EU legislation, we ensure a level playing field and avoid a situation where honest influencers and businesses are undermined by bad actors who currently operate with impunity. The influence economy can only thrive sustainably if consumers can trust the content they see online.



Ensuring Fairness in Goods Delivery and Returns



Ending Dropshipping Surprises

ECC-Net has observed a sharp rise in consumer complaints linked to dropshipping practices, which often involve the sale of goods by intermediaries who neither hold stock nor take full responsibility for the transaction. Consumers are frequently unaware they are buying from a dropshipping business, leading to a range of issues such as poor quality, lack of transparency on delivery times, difficulty accessing customer service, and unclear or inaccessible return policies—especially when returns must be sent to third countries at high costs. Many dropshipping sites also mislead consumers with tactics like fake scarcity messages, unverified environmental claims, or the appearance of local origin when goods are shipped from outside the EU.

A growing number of dropshipping businesses are promoted via social media platforms like Instagram, often by influencers who advertise seemingly local or high-quality products that are, in fact, sourced from third countries. In one such example, a consumer discovered what appeared to be high-quality muslin blankets through an Instagram page—only to find, after a closer look, that it was a classic dropshipping setup. These «social media shops» present a new and growing risk, as they blur the lines between marketing and actual retail responsibility.

ECC-Net recommends that EU law require full disclosure of the supply chain, including the dispatch origin and return conditions, prior to purchase. It should also be mandatory for all sellers targeting EU consumers—regardless of their location—to provide an EU-based return address, ensure product safety compliance, and offer proper customer support. Additionally, internet platforms that enable dropshipping business creation should only allow publication of compliant websites, and influencers promoting dropshipped goods should be held directly accountable for product claims and safety, in line with recent French legislation. For more detailed recommendations, see ECC-Net's position paper <https://www.eccnet.eu/publication/dropshipping-recommendations-regulation-eu-level>.

Better Delivery Services and Cross-Border Parcel Handling

Timely and reliable delivery of goods is a fundamental part of the e-commerce experience. ECC-Net has observed many cases of parcels going missing, significant delays, or poor handling of cross-border deliveries. We recommend strengthening enforcement of delivery standards across the EU. This could include regular audits of delivery and courier companies, as well as penalties or sanctions for those with systemic delivery failures. Consumers often feel powerless when a package is lost in transit between countries, with the seller blaming the courier and vice-versa. A more robust oversight – possibly through an EU body or improved cooperation among national postal regulators – could help resolve cross-border delivery disputes more efficiently.

At the same time, the legal framework underpinning transport and parcel delivery remains largely based on outdated laws that predate the e-commerce boom. These frameworks often leave gaps in liability, especially when the consumer never gains physical possession of the parcel. In such cases, ECC-Net proposes introducing an automatic reversal of the burden of proof: where the consumer reports that the parcel was never received, liability should rest fully with the transport company vis-à-vis the seller. This would require carriers to prove successful delivery and ensure that sellers are refunded or compensated accordingly, without pushing the burden onto the consumer. Since traders typically cannot negotiate or alter courier terms, EU law should ensure that platforms and logistics providers operate under a clear and fair liability structure that does not penalise either the seller or the consumer for delivery failures outside their control.

For a closer look into the parcel delivery issues identified by ECC-Net: <https://www.eccnet.eu/publication/parcel-delivery-challenges-addressed-ecc-net-e-commerce-sector>

Finally, we touch on **digitally provided services in sensitive sectors** – in particular, emerging practices like app-based medical or wellness services. ECC-Net is concerned about the rise of “digitally supported medical treatments” offered directly by commercial entities without proper medical supervision. To safeguard consumers (and patients), we propose developing a regulatory framework to clarify that any health-related digital service targeting consumers must involve qualified professionals. For instance, diagnostic or therapeutic advice apps should operate under the oversight of licensed doctors, not just tech companies, to ensure quality and safety. While innovation in e-health is welcome, consumer protection and health regulations need to keep up so that vulnerable consumers are not misled or harmed by unvetted digital treatments.

Protecting Consumers from Fraud and Financial Scams



Banking Fraud and Reimbursement

Fraudulent schemes targeting consumers' money have grown increasingly sophisticated, from online purchase scams to bank transfer fraud (authorised push payment scams). ECC-Net applauds moves in some jurisdictions to better inform consumers before they validate a payment and guarantee better reimbursement to victims of fraud. In the United Kingdom, for example, new rules that took effect in 2024 require banks to **reimburse victims of authorised push payment (APP) fraud** in most cases, with the costs of reimbursement split 50/50 between the sending and receiving bank. Most victims are to be refunded within five business days under this model. Such a regime aligns incentives for payment providers to improve fraud prevention (since both ends bear the cost of scams) and ensures consumers aren't left bearing the loss of sophisticated cons. ECC Net welcomes the progress in the proposed EU Payment Services Regulation and PSD3, which promise to enhance consumer protections against banking fraud—specifically Authorised Push Payment (APP) scams. The Council's agreed position supports a comprehensive anti-fraud framework that mandates both banks and payment providers to share fraud-related information, introduce name check verification for IBAN payments, and ensure transparency of fees before ATM withdrawals and card transactions take place. In addition, recent amendments under PSD3 and the accompanying regulation now require reimbursements for fraud victims who are deceived into authorising payments, placing liability on both payment service providers and electronic communications service providers in cases of impersonation or scam-related transfers. ECC Net fully expects these rules to become binding in the current legislative cycle and urges that the forthcoming law enshrines

clear reimbursement obligations—free from undue consumer delay or undue disadvantage—and strengthens redress across all payment methods. Once implemented, these reforms have the potential to offer substantial reassurance to consumers by creating a system where victims of deception are protected, and financial institutions bear clear responsibility for preventing and responding to fraud. First line victim support and safety net. ECCs are first in line to say to consumers they became victims of a scam related to consumer affairs. There is an urgent call from international community to improve victim support. When this would be addressed, ECC-Net wants to be part of this safety net, offering a first line help and safety signpost to other stakeholders.

Enhanced Payment Security and Monitoring

Alongside reimbursement rights, preventing fraud in the first place remains crucial. ECC-Net advocates for continuous improvements in consumer authentication and security measures. Strong Customer Authentication under PSD2 has helped, but fraudsters adapt quickly. The new Consumer Agenda should encourage **more secure yet user-friendly authentication methods** – for example, biometric verification, robust two-factor processes that are easy for consumers to use, and perhaps AI-driven fraud detection that doesn't burden the customer. Payment providers and digital wallet services must also be fully transparent with users about how their data is used and stored. Consumers should give informed consent to any data sharing, especially if payment data might be leveraged for commercial profiling. ECC-Net also supports mandating advanced fraud monitoring and rapid-reporting channels. Payment firms should deploy state-of-the-art fraud detection systems and be required to act on warning signs (such as unusual transaction patterns) to stop scams in real time. They should also make it easy for consumers to report suspected fraud and ensure those reports are swiftly investigated. In essence, **fraud prevention and response needs to be a core responsibility** of financial institutions, not an optional effort.

Enforcement of SEPA regulation article 8 : in case of cobranded cards, consumers need to be able on web-sites to choose the payment channel they want to use : national, bank internal, international credit card etc as guarantees might differ. Currently the trader and in the end the payment terminal provider prescribes the channels which consumers would have to overwrite.

On many websites the consumer chooses between immediate card payment, buy now pay later options or invoice for example but all cards are presented in one, without the consumer being able to truly choose. This might lead for example to a loss of chargeback options.

Improving Enforcement, Cross Border Cooperation and Access to Justice



Even the best consumer rights are of little use if they cannot be enforced in practice. ECC-Net's case handling has illuminated several structural shortcomings in enforcement and redress, especially in cross-border situations. We propose a series of measures to ensure consumer laws have real teeth and that consumers can efficiently resolve disputes.

Stronger Action on Non-EU Traders

A growing challenge is the influx of non-EU traders selling directly to EU consumers via online platforms and marketplaces. Many problematic webshops are based outside the EU, making it hard for European authorities to hold them accountable when they flout EU consumer laws. ECC-Net recommends requiring any trader from a third country who sells to EU consumers to have a legal representative or address in the EU that can be held responsible for compliance. Article 13 of the DSA states that providers of intermediary services (including online marketplaces) that are not established in the EU but offer services within the EU must designate a legal representative in the EU. A comparable and more direct regime is stipulated in the General Product Safety Regulation that entered into force last December (article 16).

This obligation does not directly apply to the individual third-country traders using a platform, but rather to the intermediary itself, i.e. the platform or marketplace.

Additionally, the amended ADR Directive opens to third country Traders to voluntarily participate in Dispute Resolution. This could be helpful for European consumers but does not solve the problem.

Modernising the CPC Network and Cross-Border Cooperation

The EU's Consumer Protection Cooperation (CPC) Regulation has enhanced coordination among national authorities, but is still be slow and cumbersome. We propose to streamline the CPC mechanism further. One idea is to upgrade the IT platform (the Internal Market Information System, IMI) to make it more user-friendly for rapid alerts and case handling. Authorities should be able to more quickly flag emerging scams or breaches and see if others have noticed the same issue. In fact, ECC-Net suggests allowing **qualified consumer organizations and networks (like ECC-Net itself)** to have some access to the CPC alert system, or at least to be able to feed in information about cross-border issues. Today, alerts are mostly confined to authorities, but many signals of consumer harm originate from consumer complaints and NGO reports. If ECC-Net or consumer associations could input alerts – or see a public-facing part of the alert system indicating, say, a trader name and type of infringement – it could greatly enhance awareness and joint action. We also recommend that when one Member State raises an alert or action against a rogue trader, others can easily join that action (a kind of opt-in for joint investigations), to avoid duplication and cover the trader's activity in all affected markets. The European Commission should be empowered to take a more proactive coordinating role as well. ECCNet very much awaits the reform of the CPC Regulation and encourages the EC to look into the possibility of strengthening the cooperation between ECCs and CPC for better utilisation of ECC-Net insights and legal capacities.

Closing Jurisdictional Gaps

One scenario we see is when a consumer from country A complains about a trader in country B, and the consumer's national authority says "we have no jurisdiction; please ask country B's authority via CPC." This can slow down assistance significantly. ECC-Net suggests clarifying that national enforcement authorities could be allowed to act on complaints from foreign consumers or organizations if they pertain to traders under their jurisdiction. In other words, if a consumer center or consumer organisation from Member State A

directly notifies Member State B's authority about a rogue trader in B harming A's consumers, the authority in B should not refuse to act merely because the complaint didn't come through the formal CPC liaison. Empowering authorities to react directly to well-founded external alerts could make enforcement more agile and close loopholes exploitative traders currently use.

Where court action is unavoidable, tools like the **European Small Claims Procedure (ESCP)** and **European Payment Order (EPO)** exist to help consumers obtain justice across borders. However, awareness and use of these tools by consumers, lawyers and jurisdictions is still limited, and procedural hurdles remain. ECC-Net recommends that the EU improve and promote these judicial redress mechanisms. ECCNet has recently published a paper on ESCP and its limited usage due to existing barriers. <https://www.eccnet.eu/publication/small-claims-big-impact-five-barriers-justice-european-small-claims-process>

In summary, a multifaceted strengthening of enforcement and redress is needed: tighter cooperation to catch the big fraudsters and bad actors, and accessible pathways for individual consumers to resolve everyday problems. ECC-Net stands ready to assist in both respects – by sharing case data to inform enforcement priorities, and by guiding consumers to the most appropriate resolution channels.

Fostering Sustainable and Safe Consumer Choices



The new Consumer Agenda should not only react to problems but also proactively shape a marketplace that is aligned with Europe's sustainability goals and the well-being of its citizens. ECC-Net believes consumer policy has a role to play in the green transition and in ensuring products are safe and sustainable by design.

Further Considerations on the Implementation of the Right to Repair and Related Frameworks

While the adoption of Directive (EU) 2024/1799 on the right to repair represents a significant step forward, some elements would benefit from further clarification to ensure consistent application across Member States.

Firstly, the Directive allows manufacturers to charge a «reasonable price» for out-of-warranty repairs, but offers little guidance on what constitutes «reasonable.» Providing EU-level criteria or benchmarks would help prevent divergent interpretations and promote fairness for consumers.

Secondly, the exemption for repair when it is «factually or legally impossible» lacks a consumer remedy. Unlike the legal guarantee under Directive (EU) 2019/771, which allows for replacement or reimbursement when repair is not feasible, no alternative is foreseen under the standalone right to repair. This could leave consumers without recourse if repair is denied.

To improve transparency, the European Repair Information Form—currently optional—should be made mandatory when a manufacturer refuses a repair. Including a required explanation would help ensure refusals are justified and documented in a clear, accessible format.

Additionally, a standardised link to right-to-repair information should be displayed at the bottom of relevant websites across the supply chain, ensuring consumers can easily access their rights.

Clarification of the Producer Guarantee of Durability (Directive (EU) 2024/825)

The producer guarantee of durability, especially when highlighted through the forthcoming harmonised label, should be clearly defined. As set out in Directive (EU) 2019/771, this guarantee obliges the producer to offer repair or replacement for the stated period. However, it is unclear whether this period is extended in the event of repair, as is the case under the new right to repair rules. Greater clarity would help consumers compare offers and understand the practical benefits of durability guarantees.

Further alignment between Directive (EU) 2019/771 and Directive (EU) 2024/825 is needed to define when such a guarantee may be offered for a fee, and to prevent misuse of the label by offering limited or unclear benefits.

Strengthening the Digital Product Passport (Regulation (EU) 2024/1781)

The development of the Digital Product Passport under Regulation (EU) 2024/1781 offers an opportunity to improve transparency regarding product-related rights. In order to support informed decision-making, the passport should include information on the legal guarantee of conformity, the consumer's right to repair under Directive (EU) 2024/1799, and the existence of any durability guarantee offered by the producer. Making this information visible and easy to retrieve would complement other consumer information tools and encourage more sustainable choices.

Consumers should be warned through the Digital Product Passport that choosing to rely on one guarantee may limit their ability to invoke the other (this information could be also proposed for a future version of the harmonised label and notice).

When relevant, they should also be informed through the Digital Product Passport that when the legal warranty has expired and the commercial guarantee of durability is either not offered or has ended, they benefit from the right to repair under the Directive (EU) 2024/1799.

This information should be presented together but arranged in a chronological order, making it easier for consumers to clearly distinguish their different rights, and to make informed choices and avoid unintended loss of rights.

Access to Spare Parts and Reparability Information

To enhance the effectiveness of the right to repair, consumers should be informed—both online and in-store—about the availability of spare parts and the reparability of products. Where spare parts are not provided, this should be clearly stated. When spare parts are available, they should be supplied within 15 days throughout the product's estimated lifespan, even after the product is no longer in production.

Conclusion

As the European Commission formulates the Consumer Agenda 2025–2030, ECC-Net offers these recommendations to ensure the strategy is grounded in the everyday realities consumers face. Our network's experience across Europe highlights based on examples the importance of tackling digital-era unfairness (from dark patterns to subscription traps), holding online marketplaces and platforms accountable, closing loopholes in travel and transport rights, safeguarding consumers in financial transactions, and ramping up enforcement in an increasingly borderless marketplace. We have also underlined the need for the consumer policy framework to support broader goals like sustainability and the protection of vulnerable groups, so that consumer empowerment goes hand in hand with social responsibility, in time of crisis where the EU needs to show it cares for its citizens. Consumer protection is a perfect vector as it concerns the daily lives of all Europeans.

The upcoming Agenda is an opportunity to build on past achievements and address new challenges boldly. We are encouraged that the Commission's vision already includes flagship initiatives like the Digital Fairness Act to curb manipulative online practices and the protection of minors. The European Consumer Centres are often the first to detect new consumer issues as they arise across different countries; by working closely with EU institutions and national authorities, we can ensure rapid feedback loops and agile policy responses when needed.

ECC-Net looks forward to the upcoming Consumer Agenda and is committed to supporting its development and implementation. Together, by addressing the issues highlighted – from car rental rights to digital fairness and enforcement – we can ensure that the next decade of consumer policy not only adapts to changes in markets and technology, but truly empowers and protects consumers in their daily lives. This will foster trust in the Single Market and benefit reputable businesses as well, creating a virtuous circle of fairness and growth. The ECC-Net hopes that the Commission finds these insights useful as inspiration, and we remain available for further information or discussion on any of the points raised in this policy paper.

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