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eccnet.eu
20 May 2026

Strengthening cross-border enforcement by revising Consumer Protection Cooperation (CPC)

Position Paper



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Introduction

The Consumer Protection Cooperation Regulation (EU) 2017/2394 is the operational backbone of cross-border public enforcement of EU consumer law. In the Single Market, effective enforcement of consumer rights is essential to ensure a safe environment for consumers and a level playing field for businesses. However, the market has evolved since the establishment of the Consumer Protection Cooperation (CPC) framework. To effectively address the current challenges, the framework needs to be adapted.

This paper does not propose a redesign of the CPC system; rather, it identifies targeted improvements to enhance speed, coherence, deterrence and consumer-visible outcomes – particularly in markets shaped by platforms, social commerce, super apps, complex digital business models, fraudulent and misleading practices, and increasingly international trader structures.

Ensure CPC workflows match the speed and complexity of modern infringements

Cross-border consumer problems have evolved. The CPC framework was designed for a market in which unfair or harmful commercial practices were often easier to evidence, traders were easier to identify, and the “location” of a practice could be linked to a trader’s establishment or the consumer’s country of residence. Today, consumers interact with services and interfaces, while advertising, contracting, delivery and payment can happen through separate actors in a chain.

Many harmful practices are not “one unlawful clause” but a system consisting of interface design, inducements, churn-reducing friction, opaque trader identity, short-lived websites or social media presences, and fast rotation of marketing content. Therefore, the revision should ensure that cooperation mechanisms and workflows match the speed and complexity of modern infringements, particularly if a practice is widespread and can scale rapidly through digital channels.

Bridge different perspectives

The European Consumer Centres Network (ECC-Net) has a unique perspective on recurrent and emerging cross-border issues through its daily assistance to consumers and its extensive EU-wide case data. This helps highlight gaps between consumer rights on paper and in practice. In the context of the CPC review, ECC-Net provides a practical, casework-driven perspective. Different stakeholders prioritise different aspects of ‘better enforcement’, including:

- stronger coordination
- national competences and procedural autonomy
- deterrence
- access to redress

ECC-Net’s position is that the revision should focus on bridging these perspectives. The most effective system will preserve subsidiarity while ensuring that cross-border enforcement operates as a genuinely European network whenever consumers are affected on a European scale.

What ECC-Net sees through casework: the “early signal” problem

ECC-Net’s casework shows that harmful practices are often EU-wide by design, while enforcement remains primarily structured around national procedures and priorities. Even where the CPC toolbox is theoretically sufficient, practice reveals operational limits: **lack of resources, the pace of cooperation, variability of prioritisation, difficulties obtaining and preserving digital evidence, and limited connection between enforcement outcomes and consumer redress.**

In general, ECC-Net often identifies emerging patterns early as the network interacts with consumers every day. Consumers report, for example, that they are unable to cancel subscriptions, were misled through influencer links, encountered marketplace sellers that subsequently disappeared, experienced blocked refunds via intermediaries, or could not identify the trader.

At the same time, enforcement approaches vary across Member States. In some countries, authorities may initiate enforcement actions even in the absence of consumer complaints, particularly where harm is structural. In others, however, a single complaint rarely triggers enforcement; instead, a cluster of similar complaints across several Member States is often required as an early indicator of a systemic practice.

Within the current framework, delays between early detection and coordinated action can be decisive. In fast-moving digital environments, delays allow harmful practices to scale rapidly. From a consumer perspective, “effective enforcement” means that harmful practices are stopped in time, consequences follow where appropriate, and remedies are accessible.



The importance of national ECC consultation:

In a recent external alert launched by an ECC concerning a cross-border car-rental trader, the European Consumer Centre Network (ECC-Net) provided, alongside the alert, an overview of network case figures broken down by country to support authorities in assessing geographic spread and potential “widespread” relevance. The subsequent feedback illustrates a recurring weakness in practice. Several authorities responded that they had not received complaints at national level – or that the trader did not operate domestically – without first consulting their national ECC or acknowledging the ECC-Net case figures already transmitted through the alert. In a number of countries, this led to conclusions such as “we received only one complaint” or “we have no complaints/no activity in our market”, despite the fact that ECC-Net casework showed a materially higher number of relevant consumer contacts from those same countries, and despite the inherently cross-border nature of the issue (consumers affected abroad but resident at home).

This example is not intended to attribute responsibility to individual authorities. Rather, it highlights a systemic risk. If external alerts are assessed primarily through the lens of each authority’s domestic complaint intake, without systematically integrating ECC evidence or recognising that cross-border issues will often not appear in national complaint channels, the CPC network risks underestimating harm, deprioritising action, and missing opportunities for coordinated enforcement.

This underlines the importance of structured and well-functioning cooperation between CPC authorities and ECCs at both national and EU level. To enhance this cooperation, the CPC framework should introduce minimum cooperation expectations for the handling of external alerts. In particular, authorities should be required to consult the national ECC (or otherwise take ECC-Net evidence into account) before concluding that a practice lacks relevance or scale.

ECC-Net experience shows that cooperation has worked well where ECC–CPC relations are structured and formalised through cooperation agreements and practical guidelines. Such cooperation improves enforcement targeting and follow-up.

How the CPC framework performs in practice: findings from internal ECC-Net survey

In a Single Market, variability between the perceived effectiveness of the CPC framework is a structural concern. ECC-Net conducted a short survey among ECCs in February 2026 (questions and results included in the annex). The responses reflect both strategic experience and operational exposure to recurring cross-border cases. Overall, the CPC framework is not perceived as failing, but as inconsistent and too slow for today's patterns of harmful business practices: 55% assess it as "moderately effective", 27% as having "limited effectiveness", and 18% as "not effective". When asked what most limits effectiveness, responses converge around both process and impact:

- slow cooperation procedures
- weak sanctions and insufficient deterrence
- inconsistencies across Member States
- limited impact on consumer redress
- evidence/data access problems

Fragmentation of enforcement

Another structural challenge is the increasing fragmentation of enforcement across parallel EU regimes and national authorities. The same trader practice may trigger consumer law enforcement, digital platform oversight, data protection, competition, sectoral supervision, or product safety responses – often in separate channels, with different timelines, evidence standards, and remedies. This creates a risk of siloed action, duplication, and enforcement gaps that sophisticated traders can exploit, particularly in platform-mediated environments. This fragmentation can be addressed by introducing minimum performance standards, including response times, prioritisation criteria and cooperation benchmarks across Member States.

Main concerns: gaps in speed and perceived outcomes

Speed emerges as the dominant concern. Especially in digital markets, the gap between the pace of the harm done and the action taken is a structural weakness. A second key finding is the consumer-outcome gap. Even if CPC enforcement leads to tangible benefits, consumers do not consistently experience the outcome as meaningful. This applies particularly if redress falls outside coordinated action or if commitments result in only partial compliance.

Strengthening enforcement powers

Authorities are not always sufficiently empowered, according to 70% of the respondents. They support strengthening enforcement powers, although this may depend on the context. Their feedback also highlights the need to better use existing powers. These operational dimensions should be reflected in the revision.

Adapting to complex business models

Regarding online platforms and marketplaces, the complexity of business models is the primary obstacle to CPC effectiveness. To adapt to this challenge, the revision must provide practical pathways for evidence gathering, trader identification, data access, and remedies in multi-actor ecosystems.

Aligning CPC application or prioritisation and strengthening EU coordination

Two further findings are particularly relevant for system design. The first is that CPC application or prioritisation could be more consistent. The second is that stronger EU-level coordination may improve CPC effectiveness. Additionally, access to basic information on alerts submitted by others and allowing qualified entities to join external alerts would enhance transparency. Even basic status visibility can improve detection, prioritisation and coordination without requiring access to full case files.

Enhancing cooperation between ECCs and CPC authorities

The findings align with wider evidence on ECC–CPC cooperation. The 2025 ECC–CPC pre-workshop survey confirms that practical cooperation between ECCs and CPC authorities is already strong and widespread. Cooperation takes concrete operational forms: joint meetings (monthly to quarterly), case-based exchanges where ECC evidence supports enforcement follow-up, joint awareness actions, and –where available – more structured arrangements, such as **formal protocols** (e.g., France and Belgium), operational guidelines (e.g., Austria) or integrated daily cooperation models in some Member States.

The same survey also identifies where the CPC revision could add value without disrupting what already works:

- improving follow-up and transparency
- reducing reliance on informal personal networks
- strengthening shared evidence standards and capacity-building to make cooperation more predictable and scalable



Illustrative examples: why targeted changes would make a difference

The following three examples illustrate how targeted changes to the CPC framework could strengthen enforcement actions against harmful business practices.

Subscription and cancellation traps

In subscription and cancellation traps, consumer detriment often arises from misleading presentation, friction in cancellation processes, and tight timing around trial-to-paid conversions. The negative effects are immediate, repeatable and widespread. ECCs may identify patterns across several Member States within weeks, yet coordinated enforcement often begins only after many consumers have already been charged. Even if commitments are secured, they may focus on wording rather than on structural remedies like ensuring that cancellation is as simple as sign-up and that refunds are practically accessible.

Influencer marketing

In influencer-driven marketing and rapidly spreading online offers, evidence can disappear quickly. Stories, short-form videos and “limited time” offers can be the core of the infringement, but also among the most difficult to preserve. Without systematic approaches to digital evidence capture and cross-border evidentiary usability, enforcement risks becoming retrospective. **Parallel national investigations may lead to inconsistent outcomes, duplicated efforts, and enforcement gaps. This fragmented approach also allows traders to exploit jurisdictional differences.**

Marketplace environments

In marketplace environments involving third-country sellers and layered intermediaries, harm is often structural and recurrent: unclear trader identity, difficulties contacting the seller, lack of EU-based return options, and reappearance of similar listings under new identities. If complexity is the key obstacle, effectiveness depends on how the CPC system interacts operationally with platform structures, data and internal compliance mechanisms.

ECC-Net's recommendations for a targeted CPC revision

ECC-Net calls for a targeted revision focused on speed, operational cooperation, evidence usability, deterrence, and consumer-visible outcomes. A stronger chain between early detection and enforcement action – through structured referrals and feedback – can improve effectiveness while preserving subsidiarity where cross-border harm requires a European response.

The CPC revision should prioritise strengthening and interlinking existing EU networks and cooperation mechanisms under different pieces of EU legislation, rather than adding new layers of coordination with every legislative initiative.

To ensure consistent enforcement across the Single Market, the CPC framework should introduce minimum performance standards, including response times, prioritisation criteria and cooperation benchmarks across Member States.

European consumer legislation is among the most advanced in the world, but its effectiveness ultimately depends on robust and timely enforcement. The CPC Regulation remains a central instrument in this regard. However, the market environment it addresses has become faster, more complex and increasingly asymmetrical than before.

Evidence from the European Consumer Centre Network survey confirms that the current system often struggles to keep pace with modern digital harms. It is frequently too slow, applied inconsistently across Member States, challenged by the complexity of platform-based business models, and not always experienced by consumers as delivering tangible outcomes.

A revised CPC that acts faster, coordinates better to address EU-wide harm, and translates enforcement into meaningful outcomes will strengthen trust in the Single Market and support a fairer environment for compliant businesses. ECC-Net stands ready to contribute its operational perspective and casework intelligence to support a pragmatic and proportionate reform.

Against this background, ECC-Net proposes the following targeted improvements:

1. Formalise consumer complaint intelligence standing in the CPC system: procedural rights, systematic feedback, and structured access to cooperation tools

ECC-Net is in a unique position to translate the broader “designated entities/external alerts” debate into a simple institutional fix: collective complaint intelligence must have a guaranteed pathway into enforcement, with clear duties on authorities to acknowledge, assess, and respond. This is exactly where ECC-Net’s unique added value lies. This could be achieved by:

- Upgrading the external alert/referral model into a formalised referral channel with minimum procedural guarantees: acknowledgement, reasons if dismissed, periodic status updates, a defined “what evidence is missing” response, notification of the enforcement outcome and actions taken
- Strengthening the role of the external alert mechanism bodies: A CPC-authority based in the trader country should be able to act once it receives an alert from an early alert body in the same country. Acting should not depend on an enforcement request from a different CPC.
- Ensuring full support for visibility of basic alert information and near-full support for allowing qualified entities to join alerts. This result should be used. Controlled transparency can reduce duplication, accelerate pattern recognition and enable faster evidence gathering across Member States. It can also make the enforcement system more efficient: when qualified entities can see that an issue is already flagged, they can complement rather than replicate, providing additional consumer intelligence or evidence from other markets. At least for ECCs the platform should be opened so ECCs can see the alerts from other ECCs.
- Supporting a proportionate level of tool access (information-sharing templates, secure channels, and where appropriate limited visibility of case status), to close the current intelligence-to-enforcement gap.
- Ensuring the disclosure of supporting evidence is essential, as verification of traders’ claims can be hindered where underlying information is not made available; clearer disclosure obligations and improved information-sharing, including appropriate access for ECCs as external alert bodies, would strengthen enforcement follow-up.

The revision should also be used as an opportunity to modernise the CPC cooperation toolbox itself, in particular the Internal Market Information System (IMI) environment, which is not yet digitally state-of-the-art and can limit efficiency in complex cross-border digital investigations and sector wide infringements. Improvements should aim to streamline alert handling, reduce administrative burden, and ensure that alerts and all related case communications – including comments submitted by ECCs and authorities – are not automatically deleted after short retention periods, but remain accessible for evidence archiving and enforcement follow-up.

2. Give the European Commission a clearer, operational mandate for EU-wide infringements –especially for platform-mediated and third-country traders

ECC-Net would support a model in which national authorities remain the backbone of enforcement, but the system can switch to a more centralised mode when the harm is genuinely EU-wide. A “variable-geometry” setup is repeatedly proposed: the Commission would be able to lead or co-lead in defined circumstances, rather than acting only as coordinator. Therefore, ECC-Net recommends to:

- Define objective triggers in the CPC Regulation for Commission-led action (e.g., widespread infringement + Union dimension + urgency/scale).
- Equip the Commission with the ability to drive a binding CPC common position and ensure coherent follow-up across Member States, while preserving national procedural autonomy for execution.
- Explicitly address third-country traders (including “no responsible EU entity identified”) by enabling faster identification and stronger cross-border measures—because current tools struggle to force compliance from outside the EU.
- Coordinate and link the CPC enforcement with DSA actions

3. Create fast, tailored CPC procedures for short-lived digital harms, with deadlines and modern e-enforcement capacity

Multiple ECCs flag that CPC procedures can be lengthy and complex, which is a structural mismatch for ephemeral advertising, fraudulent e-shops, influencer campaigns, and scam waves. To help accelerate CPC procedures, ECC-Net advises to:

- Introduce a fast-track/emergency lane for time-sensitive, high-impact infringements (clear eligibility criteria; short procedural clocks; early interim measures where necessary).

- Add clear deadlines for key steps – especially when an external alert or multi-country harm is notified – so the system cannot drift while the practice runs its course.
- Scale up shared digital investigation tooling and skills (e.g., common e-enforcement “lab” approaches; more IT/AI expertise).
- Prevent enforcement gaps caused by misleading claims about trader establishment. Ensure that false or unverifiable establishment claims do not block CPC enforcement. Where traders misleadingly indicate a place of establishment, the CPC framework should allow the authority of the Member State concerned to act without delay, rather than requiring confirmed jurisdiction before any measures can be taken.
- Enable rapid interim measures in fast-moving digital scam cases. To avoid enforcement paralysis where jurisdictional questions remain unresolved, CPC authorities should be empowered to take proportionate interim action – such as the rapid removal or blocking of fraudulent consumer-facing websites – even in the absence of a formal enforcement request, where there is a clear risk of significant consumer detriment.

4. Make enforcement genuinely deterrent: coordinated fines, credible escalation beyond “commitments”, and monitoring with consequences

A recurring diagnosis is that enforcement must trigger behaviour change, not just negotiated statements. That means a credible path from dialogue → common position → sanctions and escalations if the trader delays or partially complies and communication about the position to inform consumers and traders. To make enforcement genuinely deterrent, ECC-Net suggests to:

- Enable coordinated penalties (so traders cannot arbitrage “soft” jurisdictions) and reinforce the deterrent effect via stronger, consistent communication of outcomes.
- Ensure that commitments are not the end of the story: require monitoring, publish the closure rationale where possible, and provide a clear escalation route if commitments fail in practice.
- Support the option for Commission-level sanctioning powers in defined cases where EU-wide harm exists, to avoid fragmented deterrence.
- Streamline communication on the enforcement action. This is key to inform consumers and other traders appropriately. It can help ECCs to refer to the communication in similar cases. Communication on the enforcement action is also essential to encourage behaviour change and ensure the action’s impact.

5. Build the enforcement chain end-to-end: CPC findings must “travel” into collective redress, and ADR intelligence must feed enforcement priorities

ECC-Net observes a missing link between enforcement actions and consumer redress. Stopping harmful practices is not enough: consumers also need effective routes to redress, and enforcement systems must learn continuously from complaint and ADR data. The following adjustments can be considered to establish a strong connection between enforcement and redress:

- Make CPC common positions/Commission decisions usable as evidence to follow up on representative actions, so collective redress does not restart from zero on proving illegality.
- Require structured channels so ADR market intelligence (trends, recurring trader non-compliance, systemic complaint clusters) continuously informs enforcement prioritisation – a real early-warning loop, not an ad hoc exchange. The ADR Directive (2013/11/EU) and its amending Directive oblige ADR entities and national authorities to cooperate. If ADR entities and national authorities already have working arrangements, they should be allowed to stay in place.
- Strengthen the “three-pillar” interoperability (public enforcement, private enforcement and ADR) through minimum cooperation expectations and routine feedback loops, including at the national level.



Conclusion

Key priorities for a more effective CPC framework

The revision of the Consumer Protection Cooperation (CPC) framework should focus on targeted operational improvements to ensure that cross-border enforcement keeps pace with digital markets and delivers tangible outcomes for consumers. Evidence from the European Consumer Centres Network (ECC-Net) confirms that the current system is functional but too slow, fragmented and insufficiently outcome-oriented.

To address these challenges, the following priorities should guide the revision:

- **From early signal to enforcement action**

Consumer complaint intelligence must become a structured trigger for enforcement, with clear procedural rights for ECC alerts and systematic feedback from authorities.

- **Clear obligations and timelines**

Authorities should be required to acknowledge, assess and respond to external alerts within defined deadlines, ensuring accountability and predictability.

- **Faster and more operational enforcement tools**

Authorities should be required to acknowledge, assess and respond to external alerts within defined deadlines, ensuring accountability and predictability.

- **Consistent minimum performance standards**

Establish EU-wide benchmarks for response times, prioritisation and cooperation to reduce fragmentation and ensure a coherent level of enforcement across Member States.

- **Stronger deterrence and enforcement impact**

Ensure coordinated sanctions, credible escalation beyond voluntary commitments, and transparent communication of enforcement outcomes.

- **Effective consumer redress**

Strengthen the link between enforcement and tangible consumer outcomes, including refunds and access to compensation mechanisms.

- **Systematic and integrated cooperation**

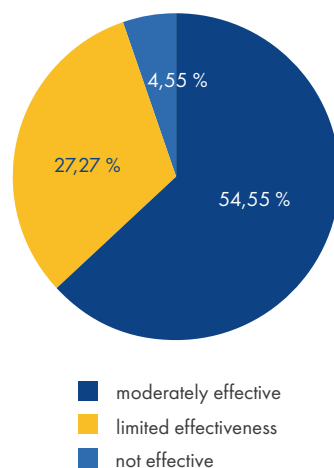
Reinforce structured cooperation between ECCs, CPC authorities and other enforcement actors, and ensure stronger links between public enforcement, ADR and collective redress mechanisms.

- **EU-level coordination for EU-wide harm**

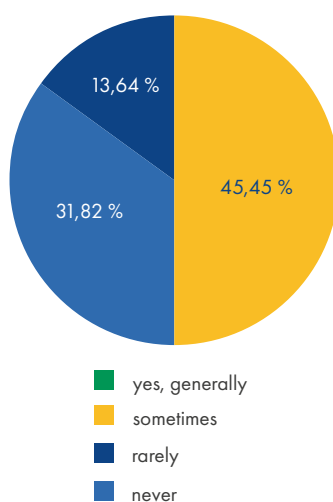
Enable a more operational role for the European Commission in cases of widespread infringements, particularly in platform-based and cross-border digital markets.

A CPC framework built on these principles will ensure that enforcement is faster, more coherent and more effective in practice. It will strengthen trust in the Single Market, improve consumer protection outcomes, and support a level playing field for compliant businesses. ECC-Net stands ready to contribute its casework-based intelligence and operational expertise to support a focused and effective reform.

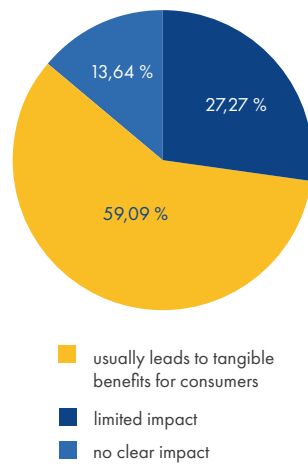
Annex 1: full ECC-Net survey results on the CPC system



ECC-Net conducted a short questionnaire among ECCs in February 2026. The responses reflect both strategic experience and operational exposure to recurring cross-border cases. Overall, the CPC framework is not perceived as failing, but as inconsistent and too slow for today's patterns of harm. 54.55% assess it as "moderately effective", 27.27% as having "limited effectiveness", and 4.55% as "not effective".



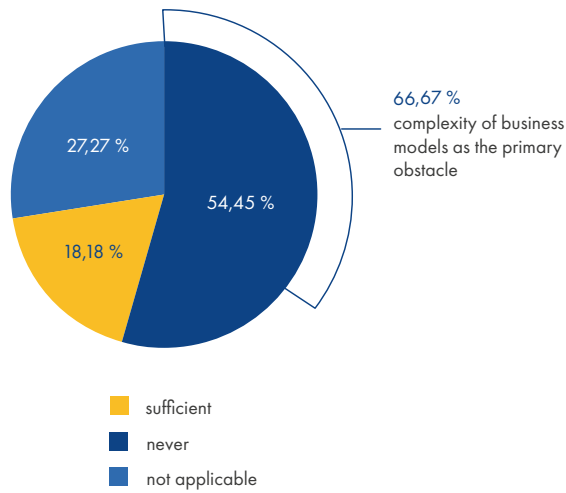
-Speed emerges as the dominant concern. When asked whether CPC action usually comes in time to prevent or limit consumer harm, 0% answered "yes, generally". Instead, 45.45% responded "sometimes", 31.82% "rarely", and 13.64% "never".



A second key finding is the consumer-outcome gap. Only 27.27% report that CPC enforcement usually leads to tangible benefits for consumers (e.g. compliance, refunds, or the cessation of harm), while 59.09% observe limited impact and 13.64% no clear impact.

When asked what most limits effectiveness, responses converge around both process and impact: slow cooperation procedures, weak sanctions and insufficient deterrence, inconsistencies across Member States, limited impact on consumer redress, and evidence/data access problems. Open comments further highlight long timelines, low prioritisation, and cases where partial remedies are accepted even when illegal elements remain.

On powers and capacity, 68.18% consider authorities not sufficiently empowered and support strengthening enforcement powers (22.73% indicate that this depends on context). **Feedback also underlines that, beyond introducing new competences, greater emphasis should be placed on making full and effective use of existing powers.**

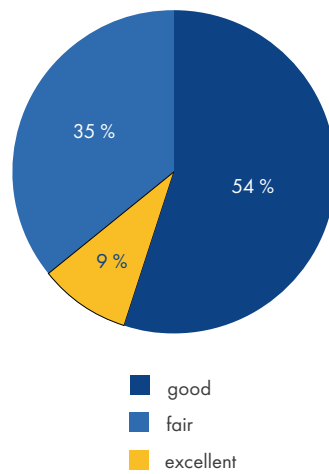


Platforms and marketplaces remain a key pressure point. 54.55% consider CPC effectiveness vis-à-vis large online platforms insufficient (18.18% sufficient; 27.27% not applicable). Among those identifying shortcomings, 66.67% cite the complexity of business models as the primary obstacle.

Two further findings are particularly relevant for system design. First, 95.45% observe inconsistencies in CPC application or prioritisation (59.09% “yes” and 36.36% “to some extent”). **Second, 77.27% believe that stronger EU-level coordination would improve CPC effectiveness.**

There is also strong support for greater transparency and network effects among qualified entities: 86.36% support access to basic information on alerts submitted by others, and 86.36% support allowing qualified entities to join external alerts. Even basic status visibility can improve detection, prioritisation and coordination without requiring access to full case files.

These findings align with wider evidence on ECC–CPC cooperation. Evidence gathered in the 2025 ECC–CPC pre-workshop survey confirms that **practical cooperation between ECCs and CPC authorities is already strong and widespread.** Among **49 respondents in 28 Member States** (approximately **55% ECC / 45% CPC**), **94%** reported existing or planned national cooperation with their ECC/CPC counterpart.



At network level, collaboration is generally perceived positively (**54% “good” and 9% “excellent”**, with 35% “fair”). Cooperation takes concrete operational forms: regular joint meetings (often monthly to quarterly), case-based exchanges where ECC evidence supports enforcement follow-up, joint awareness actions, and—where available—more structured arrangements such as **formal protocols** (e.g., France and Belgium), operational guidelines (e.g. Austria) or integrated daily cooperation models in some Member States.

Annex 2: ECC-Net survey questions for Input on the CPC Regulation Revision

Instructions:

Please tick the boxes that apply. Add short comments only where essential (max. 2 lines).

Identification (for internal analysis only)

Name of ECC (Required.)

Function of respondent (Required.)

- ECC Director
- ECC Case handler
- Other (please specify)

Role of the ECC under the CPC Regulation

Is your ECC designated as an Article 27 external alert body under the CPC Regulation? (Required.)

- Yes
- No

Do your CPC authorities provide feedback to Article 27 external alert bodies on your submitted alerts (e.g. status updates, follow-up, outcomes)?

- Yes
- No
- Sometimes
- Other (please specify briefly)

Overall effectiveness of the CPC Regulation

How would you assess the effectiveness of the current CPC framework in practice? (Required.)

- Very effective
- Moderately effective
- Limited effectiveness
- Not effective
- Other (please specify) max 2 lines

Main operational problems

Which issues most limit CPC effectiveness?(Required.)

- Cooperation procedures are too slow
- Deadlines are not binding or not respected
- Insufficient enforcement powers
- Weak sanctions / lack of deterrence
- Difficulties with online platforms / marketplaces
- Inconsistent application across Member States
- Limited impact on actual consumer redress
- Evidence sharing and/or data access problems
- Scope gaps (traders or practices not covered)
- Optional short example, max. 2 lines

Speed of intervention

Does CPC action usually come in time to prevent or limit consumer harm? (Required.)

- Yes, generally
- Sometimes
- Rarely
- Never
- Optional short example, max. 2 lines

Enforcement Powers

Are CPC authorities sufficiently empowered? (Required.)

- Yes
- No – powers should be strengthened

If No, which areas need strengthening? (tick all that apply)

- Access to trader / platform data
- Platform cooperation obligations
- Interim measures / rapid actions
- Sanctions / penalties
- Use of cross-border evidence

Do you think CPC authorities should be granted stronger enforcement powers?(Required.)

- Yes
- No
- Depends (please explain briefly)

Online Platforms and marketplaces

CPC effectiveness vis-à-vis large online platforms is currently: (Required.)

- Sufficient
- Insufficient
- Not applicable (no relevant cases / experience)

If Insufficient, main reason (tick one):

- Lack of clear obligations
- Lack of cooperation
- Lack of enforcement tools
- Complexity of business models

Coordination and role at EU level

Do you observe inconsistencies in how CPC is applied or prioritised across Member States?(Required.)

- Yes
- No
- To some extent

Would stronger EU-level coordination (e.g. a more central role for the Commission) improve CPC effectiveness? (Required.)

- Yes
- No
- Depends

Should there be clearer criteria for when a case qualifies as:

- a “widespread infringement”, or
- a “widespread infringement with Union dimension”?(Required.)

- Yes
- No
- depends, please shortly specify

Transparency and cooperation between qualified entities

Would you be in favor of all qualified entities being able to see alerts submitted by others (only basic information: trader name and type of infringement)? (Required.)

- Yes
- No
- Depends

Would you support allowing qualified entities to join external alerts submitted by others? (Required.)

- Yes
- No
- Depends

Role of ECCs in CPC procedures

In your view, should ECCs have a more formal role in CPC procedures (e.g. recognition as parties to proceedings)? (Required.)

- Yes
- No
- Depends (please specify)

Impact on consumers

Does CPC enforcement usually lead to tangible benefits for consumers?(Required.)

- Yes (e.g. compliance, refunds, stopping harm)
- Limited impact
- No clear impact

Single most important change

If only one change could be made to the CPC Regulation, what should it be?

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