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- *Opinion of the European Economic and Social Committee (EESC)*

Delegations will find attached an EESC exploratory opinion on the above, requested by the Polish Presidency and adopted by the EESC plenary on 26 February 2025.

This opinion is available in other linguistic versions on the following website:

[Consumer protection and the impact of the digital and green transitions on consumers | EESC](#)



OPINION

European Economic and Social Committee

Impact of the digital and green transitions on consumers

Consumer protection and the impact of the digital and green transitions on consumers
(Polish presidency exploratory opinion)

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Referral	6/9/2024, Polish Presidency of the Council of the European Union
Legal basis	Article 304 of the Treaty on the Functioning of the European Union
Section responsible	Single Market, Production and Consumption
Adopted in section	12/2/2025
Adopted at plenary session	26/2/2025
Plenary session No	594
Outcome of vote (for/against/abstentions)	209/0/2

1. Conclusions and recommendations

- 1.1 The transition to a more sustainable and digital society presents both challenges and opportunities for all consumers. The EESC underscores the need to empower consumers to make sustainable choices and adapt to a rapidly changing digital environment, as signalled in the New Consumer Agenda¹. However, some studies² reveal that digital platforms and digital retailers often lack clear information on the sustainability of products, preventing consumers from making informed decisions. On top of this, the fact that it generally costs more to buy sustainable products remains a significant barrier for many consumers³. That said, digitalisation can help offset these economic barriers by making it easier to compare prices and by offering a range of products, especially in areas where there is less choice and with consumers therefore having less power to choose.
- 1.2 The EESC backs the idea that, to advance the green transition and ensure a high level of consumer protection, it is essential to provide clear and reliable information on the sustainability of products. In this regard, Directive (EU) 2024/825⁴ aims to eliminate commercial practices involving greenwashing and to improve digital transparency. The EESC points out that products should be labelled in a way that makes it easier to make informed purchases, providing information on life cycle costs, energy efficiency, durability and reparability of products. Furthermore, the Committee believes that mandatory and voluntary product information requirements should be harmonised across the EU, information overload avoided and the accuracy of labels ensured, so that consumers can adopt more sustainable consumption patterns.
- 1.3 The European Commission's New Consumer Agenda⁵ points out that access to sustainable products should not depend on the level of income or where a person lives, but should be available and affordable for all. To achieve this, the EESC calls on the Commission and national authorities to come up with an appropriate framework to ensure access to sustainable products through tax incentives and, in some cases, direct subsidies to reduce the price differential. It also calls for effective policies to be put in place to ensure access to the digital market, especially in rural and less populated areas, and for technologies to be developed to integrate consumers with fewer digital skills. Digitalisation also makes it easier to acquire sustainable technologies (for reuse, recycling, etc.). While prices may be high at the outset, in the long term they result in significant savings in energy consumption and running costs.
- 1.4 The EESC believes that consumers are generally concerned about sustainability. This is especially true of young Europeans, who will feel the full impact of the digital and green transitions. However, the cost of living crisis is forcing many consumers across the board and young people in particular – who usually earn less – to prioritise price over sustainability. There

1 [COM\(2020\) 696 final](#).

2 For example, Zarra, A. et al., *Sustainability in the Age of Platforms*, 2019.

3 [OCU, Study 'Price of organic products'](#), 2022.

4 OJ L, 825, 6.3.2024, ELI: <http://data.europa.eu/eli/dir/2024/825/oj>.

5 [COM\(2020\) 696 final](#).

must be a balance between the ability to access sustainable products and services and to afford them.

- 1.5 The EESC believes that the digital and green transitions are vital for long-term sustainability and need to be managed in an inclusive way to ensure that vulnerable consumers are not excluded, especially those who have not grown up with digitalisation. The EESC urges the Commission and the Member States to protect vulnerable consumers in particular (with this vulnerability viewed in a broad and dynamic way) in order to give them better access to sustainable products through digital markets – especially through e-commerce and platforms – which can narrow the rural divide.
- 1.6 The EESC reiterates the importance of educating consumers on how to make informed choices. Education is key to supporting sustainable transition policies and to promoting transparency, standardisation of trusted websites and the take-up of local approaches. Here, the EESC underlines consumer organisations' important role in this twin transition, but they need secure funding if they are to make a strong, professional contribution. Furthermore, local authorities should endeavour to offer better assistance and take down bureaucratic barriers.
- 1.7 The EESC states that if the digital and green transitions are to be a success, not only must all consumers take part, but manufacturers and retailers too. All those involved must assume responsibility.
- 1.8 According to the EESC, digital platforms and digital retailers should make it easier to access sustainable products, they should be transparent and they should provide tools to compare costs and benefits. Furthermore, the EU should address the negative effects of non-EU platforms offering products at low prices and put in place stricter regulation with effective customs duties.

2. **General comments**

- 2.1 The transition to a digital and more sustainable society in the broadest sense, taking into account the economy (ensuring continuous and stable economic growth, promoting inclusive and efficient development that does not use up resources or perpetuate inequalities), the environment (preserving, protecting and restoring natural ecosystems and biodiversity, ensuring the responsible use of natural resources that does not go beyond the planet's regenerative capacity) and society (promoting fairness, social justice and wellbeing for all, with equal access to key resources such as education, health and decent work), presents challenges and opportunities for all consumers. However, this is especially true of young Europeans (who will have no other choice) and the vulnerable, whether they be older people, those who have not 'grown up' with digitalisation or those who are vulnerable for other reasons.
- 2.2 In this regard, the New Consumer Agenda⁶ highlights the need to empower consumers, not only to make sustainable choices but also to adapt to a rapidly changing digital environment. Digitalisation is an effective tool as it provides faster access to information on sustainable

⁶ [COM\(2020\) 696 final](#).

products, but also brings complexities such as too many options or lack of clarity in the way environmental qualities are presented.

- 2.3 The Organisation of Consumers and Users (OCU) – the Spanish consumer protection organisation – has shown that sustainable products cost much more to buy than conventional products⁷. Consumers wanting to care for the planet and committed to forms of agriculture and livestock farming that respect the land and animal welfare do have access to eco-labelled products, but the prices put them off, being 68% more expensive than ‘normal’ products. These differences do nothing to bring about a more sustainable consumption model, with much more still to be done to reconcile sustainability and affordability⁸.
- 2.4 In order to contribute to the proper functioning of the internal market, based on a high level of consumer protection, environmental protection and defence of workers’ rights, and to make progress in the green transition, it is essential for consumers to be able to make informed purchasing decisions and thus contribute to more sustainable consumption patterns. That means that traders have a responsibility to provide clear, relevant and reliable information. Directive (EU) 2024/825⁹ aims to eliminate greenwashing and to provide a high level of clear and transparent information. The directive will also strengthen consumer protection against early obsolescence¹⁰ and result in better information being provided on legal guarantee rights and product durability and repair at the point of sale. The EESC considers it necessary for Member States to step up their efforts to ensure compliance with the directive and eliminate such practices, while digital platforms must take effective action to stop unfair practices related to false claims about the sustainability of products.
- 2.5 The EESC recognises the work of the Consumer Protection Authorities Network (CPC network)¹¹ on consumer protection cooperation. When it comes to sustainability, the CPC network, which is coordinated and supported by the Commission, has taken action against several companies¹² for misleading green claims, early obsolescence or inaccurate consumer information. In the area of online retail, the CPC network¹³ and the European Commission¹⁴ are currently investigating the Temu platform for several illegal practices. The EESC welcomes and acknowledges these efforts, as well as the reflections on reforming the CPC Regulation to implement it more quickly, more effectively and with a greater deterrent effect.
- 2.6 Lack of transparency is another major barrier for consumers. Therefore, in order to promote a greener and more circular economy which is consumer-led through purchasing decisions, which must be based on environmentally reliable labelling and assertions, it is crucial for them to

⁷ [OCU, Healthy food – price matters](#), 2023.

⁸ [OCU, Study ‘Price of organic products’](#), 2022.

⁹ [OJ L, 2024/825, 6.3.2024, ELI: <http://data.europa.eu/eli/dir/2024/825/oj>](#). The directive will apply from 27 September 2026.

¹⁰ First mentioned as ‘planned obsolescence’ at EU level in an EESC own-initiative opinion, [OJ C 67, 6.3.2014, p. 23](#).

¹¹ [Consumer Protection Cooperation Network](#).

¹² [Sustainable consumption actions, 2023](#).

¹³ [European Commission, press release, 8.11.2024](#).

¹⁴ [European Commission, press release, 31.10.2024](#).

include information not only on energy efficiency but also on life cycle costs, durability and the reparability of products. The EESC considers it necessary to harmonise the requirements for mandatory and voluntary product information, avoiding information overload due to the large number of existing labels and ensuring that they are accurate.

3. Considerations on the cost of sustainable products

3.1 Consumers are aware that sustainable products can come at a higher cost. It is also easier to access organic food and other organic products by buying them online, though costs may be higher, partly due to distribution logistics. In order to promote sustainability, consumers could have the possibility, when buying online, to opt for a more sustainable mode of distribution, such as sustainable last-mile delivery of goods, for example using electric vehicles, batch deliveries, delivery points, etc.

3.2 The European Commission's New Consumer Agenda¹⁵ warned that access to sustainable products should not depend on the level of income or where a person lives, but should be available to everyone. To this end, the EESC believes that the Commission and national authorities should work to develop an appropriate framework to ensure all consumers have access to sustainable products, with tax incentives – such as a value added tax that favours sustainability – and, where necessary, direct subsidies to reduce the price differential of these products. Effective policies should also be put in place to ensure that consumers have access to the digital market regardless of where they live, with a focus on rural and less populated areas that already face different challenges, as pointed out in an earlier EESC opinion¹⁶. In addition, technologies should be developed to include less digitally skilled consumers. Furthermore, the use of sustainable technologies (for reuse, recycling, etc.) and access to sustainable products should be promoted.

3.3 Digitalisation also makes it easier to purchase or rent sustainable technologies and services, including low-energy appliances. In addition, access to online information allows consumers to compare different brands and models to find the most affordable and sustainable options. Greater awareness of energy consumption using digital devices and applications connected to electricity meters and appliances should also be promoted in order to enforce the EU's energy efficiency policies.

4. Concerns of young consumers

4.1 Young Europeans, who will feel the full impact of the digital and green transitions, are increasingly concerned about the environment and sustainability, and digital platforms play a key role in how they acquire information and decide to look for environmentally friendly products and services. According to Eurobarometer¹⁷, 91% of 15-24 year-olds believe that the fight against climate change can help improve their own health and wellbeing.

¹⁵ [COM\(2020\) 696 final](#).

¹⁶ [OJ C, C/2024/1571, 5.3.2024, ELI: <http://data.europa.eu/eli/C/2024/1571/oj>](#).

¹⁷ [European Commission, press release, 25.1.2022](#).

4.2 While digital platforms and digital retailers make it easier to access sustainable products, these products are not always affordable. Young people are also facing significant economic challenges. According to the Euroconsumers study¹⁸, the cost of living crisis has increased pressure to choose products on the basis of price. It is clear that those most affected are young consumers (who tend to earn less), but also lower and even middle income households. It is therefore necessary to strike a balance between the sustainable option and affordability, so that it does not end up being available to a limited number of consumers only. The EESC notes that more and more young people rent the properties in which they live for longer, meaning that they usually have no real say in the sustainability of household appliances and the products they use in their rented homes.

5. **Lessons learned and future**

5.1 The EESC states that, if the digital and green transitions are to be a success, not only must all consumers take part, but manufacturers and retailers too. All those involved must assume responsibility. We must leave no one behind, the different needs of each age group must be taken into account.

5.2 The digital and green transitions are essential for long-term sustainability, but they need to be managed in an inclusive way to ensure that the most **vulnerable** consumers are not excluded. The EESC calls on the Commission and the Member States to take steps to give vulnerable consumers greater protection in accessing sustainable products through digital markets. Consumers' vulnerability should be considered from a broad perspective which changes over time, as a consumer may be in a vulnerable position for varying reasons, whether relating to health, economic or social situation, their skills or where they live. They may also find themselves in a vulnerable situation temporarily. This might be because they are unemployed or because they belong to a particular age group, such as young or older people, which nevertheless remains a relevant issue. The EESC notes the importance of adapting communication more effectively to the needs of the various vulnerable groups. In this regard, e-commerce can help narrow the rural divide and improve access to quality products or services.

5.3 The EESC believes that consumer **education** (including digital empowerment) is key to generating trust in sustainable transition policies and support for them. A twin-track approach of digitalisation and education will enable consumers to make more informed choices and play an active part in the transition to a more sustainable society. Principles of transparency and information in e-commerce, standardisation of trusted websites and local approaches to sustainable behaviours that should become the norm (i.e. repairing a product instead of replacing it, or favouring social or circular economic models) must be promoted. The role of **consumer organisations** in this twin transition is crucial, but they need secure funding to be able to effectively help consumers address the challenges they face. Furthermore, local administrations should endeavour to provide better assistance by providing one-stop shops for members of the public and removing bureaucratic hurdles.

¹⁸ [Euroconsumers Affordability Barometer, 2023](#).

- 5.4 The EESC believes it is crucial for policies to focus not only on the supply of sustainable products and services, but also on improving **digital platforms** and digital retailers. These policies should be designed to facilitate access to sustainable products with a wider choice on offer, they should be transparent in how they present information and they should provide tools for effectively comparing long-term costs and benefits.
- 5.5 The EESC believes that there should be stricter rules for **non-EU platforms**, which must fully respect EU consumer protection laws and offer only safe products, while also demonstrating their efforts to promote sustainability. These rules should also tackle tax evasion. Compliance with product safety, environmental and consumer protection standards is essential. Manipulation, such as customs undervaluation, must be prevented in the interest of all participants in the European single market. The EU could digitalise and strengthen customs to reduce the number of products containing harmful components from entering the Union, or to stop them entering altogether. Market surveillance authorities need more staff combined with overarching and modern digital systems. The EESC calls for particular attention to be paid to the negative impact on the environment, as well as on social and human rights, of platforms located outside the EU, which offer products to European consumers at very low prices.

Brussels, 26 February 2025.

The President of the European Economic and Social Committee
Oliver RÖPKE
