



Council of the European Union  
General Secretariat

**Brussels, 06 February 2026**

**WK 2075/2026 INIT**

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## **CONTRIBUTION**

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**From:** General Secretariat of the Council  
**To:** Working Party on Consumer Protection and Information (Attachés)  
Working Party on Consumer Protection and Information

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**Subject:** Draft Council conclusions on the 2030 Consumer Agenda and action plan for consumers in the single market - Table with Member States comments on document ST 5251 2026 REV 1

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Delegations will find attached a table with the Member States comments on the above-mentioned document.

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**Guidelines to be followed**

Please kindly provide your contributions in the table below.

**Drafting suggestions:** you may use 'track changes'\* or formatting (for example bold-underline for additions and ~~strike-through~~ for deletions, **where necessary, in a different colour**). \*Track changes can only be connected once the cursor is placed in editable areas (Drafting or Comments columns).

To make it feasible to consolidate all contributions, the structure of the table must not be changed, so **no rows can be added or deleted**.

New provisions may only be added in any of the '**existing cells**'.

**Name of document:** please add the **two initials** of your delegation's country followed by a space (to the MS Word document name), followed by any optional text, for example, for Austria: **AT comments on ... .docx**

Thank you for your cooperation!

1 <sup>st</sup> Compromise proposal	Drafting suggestions and Comments
<p><b>DRAFT Council conclusions on the 2030 Consumer Agenda and action plan for consumers in the single market</b></p>	<p>IT  <b>(Comments):</b>                      Italy thanks the Presidency and expresses its appreciation for the inclusion of several points raised by the delegation in the Council conclusions on the 2030 Consumer Agenda. Underlines nevertheless the need to amend, supplement and strengthen certain key aspects, as further detailed below, <b>while not presenting Italy any red lines</b>.                      In particular, while acknowledging that the cost of living is a widespread concern among consumers across the European Union, Italy insists that it should be clearly highlighted that addressing the high cost of living requires not only transparency and fair pricing practices, but also specific attention to energy-related consumer costs and to practices that may undermine price comparability and consumer trust.                      With regard to commercial practices that modify product quantities or characteristics without adequate consumer information, the Italian delegation welcomes the inclusion of its proposal in the recitals. Similarly, it positively acknowledges the inclusion of the concept of paying attention to emerging</p>

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	<p>business models that encourage overconsumption, while underlining that such attention should also be linked to consumer protection issues, product safety, sustainability and consumer information, as envisaged in the original proposal. Italy also welcomes the inclusion of the strengthening and interoperability of market surveillance platforms, as well as the invitation to Member States to actively use the Safety Gate portal to report unsafe products. It further welcomes the inclusion of specific attention to the growing volume of low-value consignments originating from third countries, which pose particular challenges in terms of product safety, customs controls and fair competition.</p> <p>As regards the simplification of Commission initiatives, the Italian delegation acknowledges the value of the addition of a dedicated paragraph, but observes that—compared to the original Italian proposal—the focus has shifted from the specific protection of small and medium-sized enterprises and vulnerable consumers to a more general objective of reducing administrative burdens, maintaining only in a generic manner the need for non-digital alternatives for consumers, without mentioning specific sectors such as e-commerce.</p> <p>Italy therefore proposes an amendment aimed at restoring a focus on the needs of small businesses and vulnerable consumers, with particular reference to the e-commerce sector and the availability of appropriate non-digital alternatives. Furthermore, the Italian delegation welcomes the inclusion of a point highlighting the importance of consumer education, including financial literacy and awareness-raising in purchasing choices, as a key tool to promote consumer empowerment, inclusion, resilience and informed decision-making, particularly in digital and financial markets.</p> <p>Finally, the Italian delegation raises no objections to the passage welcoming the Commission’s intention to revise the Consumer Protection Cooperation Regulation (CPC) and to assess the possible need for centralized investigation and enforcement powers at EU level in specific cases, however, it appears to us that the amendment provides more incisive guidance as to the direction that the revision of the CPC will have to take. <b><i>Details of the above are set out below with reference to the individual paragraphs of the Council conclusions.</i></b></p> <p>SE</p>

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	<p><b>(Comments):</b>                      SE’s scrutiny reservation still stands.                      SE would like to emphasize the importance of the text being clear and not too long. Unnecessary additions that provide no added value should be avoided. This way, it is clear what is being highlighted and the document becomes more useful.                      The starting points, as SE sees it, are that the Council conclusions should relate to the Commission's communication on the Consumer Agenda and that they should remain within the consumer policy area. Certain additions that have now been made appear to lie somewhat outside the consumer policy area and/or lack a clear connection to announced measures in the Consumer Agenda. Against this background, and without wishing to diminish the importance and topicality of the issues, SE would like to present the following views and proposed adjustments.                      SK</p> <p><b>(Comments):</b>                      The draft Council conclusions repeatedly go beyond a political and declaratory approach by including excessive technical detail, exhaustive lists of specific practices, tools and instruments, as well as explicit calls for concrete legislative acts or revisions. This level of specificity risks undermining the strategic and political character of the text by introducing a level of detail that goes beyond what is appropriate for strategic and political conclusions.                      The level of detail should therefore be systematically reduced throughout the text, in order to preserve a focus on policy objectives rather than exhaustive listings, specific tools or predetermined legislative outcomes.                      In this document, we provide several examples of how the text could be adjusted to be more declaratory and general.</p>
<p>RECALLING                      – the Council conclusions adopted on 22 February 2021 on the previous ‘New Consumer Agenda’;</p>	<p>HR  <b>(Comments):</b>                      HR may support the addition in the respective text.</p>

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<p>– the conclusions of the European Council at its meeting on 23 October 2025, stressing, <b>among others</b>, the importance of protecting minors;</p>	
<p><b><u>TAKING NOTE of the report on the future of the Single Market presented by Enrico Letta, which highlights the need to strengthen the Single Market to support competitiveness and resilience, recognising that consumer protection and competitiveness are mutually reinforcing and that consumer trust underpins the proper functioning of the Single Market;</u></b></p>	<p>AT  <b>(Drafting suggestions):</b>                      TAKING NOTE of the report on the future of the Single Market presented by Enrico Letta, which highlights the need to strengthen the Single Market to support competitiveness and resilience, recognising that consumer protection and competitiveness are mutually reinforcing and that consumer trust underpins the proper functioning of the Single Market, <b><u>also highlighting the need for simplification as well as that enhancing consumer protection rules is crucial for building a Single Market that works for all;</u></b></p> <p>AT  <b>(Comments):</b>                      AT supports the reference to the Letta Report and suggests explicitly recalling its core principles.</p> <p>PL  <b>(Comments):</b>  <b>General comments:</b></p> <ul style="list-style-type: none"> <li>• <b>PL welcomes</b> those provisions which emphasise the need to strengthen consumer protection, support consumer well-being, promote a fair transition towards a digital and green economy, and which place particular emphasis on the protection of consumers from vulnerable groups, in particular minors, who are exposed to serious threats and risks, especially in the online environment.</li> <li>• <b>PL positively assesses</b> those points which highlight the need to ensure a high level of consumer protection in the digital environment. We note that many issues can already be effectively addressed through the application of existing legislation, in particular the Unfair Commercial Practices Directive (UCPD). In addition to the UCPD, the Digital Services Act (DSA), the Digital Markets Act (DMA) and the Artificial Intelligence Act (AI Act) are already in force, providing a detailed legal framework for online activities.</li> </ul>

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	<p>Therefore, the Digital Fairness Act should be preceded by a thorough identification of problems in order to avoid duplication of existing solutions.</p> <ul style="list-style-type: none"> <li>• <b>PL welcomes</b> initiatives aimed at strengthening the protection of vulnerable consumers against digital threats, in particular the protection of children. We also support actions and provisions pointing to the need to protect consumers against risks related to the use of artificial intelligence.</li> </ul>
<p>RECALLING the Commission’s Communications on:</p> <ul style="list-style-type: none"> <li>– ‘A competitiveness compass for the EU’</li> <li>– ‘A comprehensive EU toolbox for safe and sustainable e-commerce’</li> <li>– ‘The single market: our European home market in an uncertain world’</li> </ul>	<p>PL  <b>(Comments):</b>  <b>With regard to the recitals of the Council Conclusions, PL:</b></p> <ul style="list-style-type: none"> <li>• <b>does not object to the proposed recitals and welcomes</b> those declaratory parts of the recitals which emphasise the need to strengthen consumer protection, support consumer well-being, promote a fair transition towards a green and digital economy, and draw particular attention to the protection of vulnerable consumers, in particular minors, who are exposed to serious threats and risks, especially in the online environment;</li> <li>• <b>supports raising the issue of combating commercial practices</b> that influence consumers’ purchasing decisions and relate to changes in the quantity or characteristics of products, in particular in the case of pre-packaged food and household goods, without clear and visible information for consumers;</li> <li>• <b>stresses that maintaining a high level of consumer protection is of paramount importance</b>, and that this should be clearly reflected in the Council Conclusions.</li> </ul>
<p>RECALLING the Jutland Declaration: Shaping a safe online world for minors;</p>	
<p><b>HIGHLIGHTING the current geopolitical developments, and their</b></p>	<p>EE</p>

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<p><u>impact on consumers, international cooperation and challenges linked to third-country operators and global supply chains;</u></p>	<p>(Drafting suggestions):  <u>HIGHLIGHTING the current geopolitical developments, and their considerable impact on consumers, in particular, in Member States close to EU’s Eastern border, international cooperation and challenges linked to third-country operators and global supply chains;</u>                      EE                      (Comments):                      Estonia supports LV proposal.                      HR                      (Comments):                      HR welcomes the proposed addition to the text, particularly with regards to challenges linked to third-country operators and global supply chains, which HR has already pointed out as especially relevant in the previous comments.                      HU                      (Drafting suggestions):  <u>HIGHLIGHTING the impact of current economic, social and geopolitical developments, and their impact on consumers and traders, global supply chains, international cooperation, and such as the challenges linked to third-country operators and global supply chains;</u>                      LV                      (Drafting suggestions):  <u>HIGHLIGHTING the current geopolitical developments, and their considerable impact on consumers, in particular, in Member States close to EU’s Eastern border, international cooperation and challenges linked to third-country operators and global supply chains</u>                      NL                      (Drafting suggestions):  <u>HIGHLIGHTING the current geopolitical developments, and their impact on consumers, challenges related to international cooperation and challenges linked to regarding third-country operators and global supply chains, and their impact on consumers;</u>                      NL</p>

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	<p><b>(Comments):</b> The developments all have impact on consumers. The wording ‘international cooperation’ seems to be a bit strange in this sentence.</p>
<p><b><u>RECOGNISING that the cost of living is a concern for many consumers across the European Union;</u></b></p>	<p>HU <b>(Drafting suggestions):</b> <b><u>RECOGNISING that the cost of living is a concern for many consumers and might be a concern for fair traders, particularly SMEs as well, hence a complex competitiveness issue across the European Union;</u></b></p>
	<p>IT <b>(Drafting suggestions):</b> <b>HIGHLIGHTING that addressing the high cost of living requires not only transparency and fair pricing practices, but also specific attention to energy-related consumer costs and to practices that may undermine price comparability and consumer trust;]</b> IT <b>(Comments):</b> We welcome the shift in focus of the point, but we insist on the inclusion of the important concept that addressing the high cost of living requires not only transparency and fair pricing practices, but also specific attention to energy-related consumer costs and to practices that may undermine price comparability and consumer trust. We therefore reiterate our request to include the following paragraph, which was already highlighted in the previous written comments.</p>
<p>RECALLING the benefits the digital economy has brought to consumers; <b><u>while and the increasingly omnichannel nature of consumer relationships, the rapid evolution and increasing use of new digital technologies and tools, such as Artificial Intelligence (AI), and especially Agentic AI, across sectors;</u></b> HIGHLIGHTING the need to ensure that EU consumer law continues to provide a high level of consumer protection <b><u>and empowerment</u></b> in the digital environment <b><u>in light of technological developments and rapidly evolving</u></b></p>	<p>CZ <b>(Drafting suggestions):</b> RECALLING the benefits the digital economy has brought to consumers; <b><u>while and the increasingly omnichannel nature of consumer relationships, the rapid evolution and increasing use of new digital technologies and tools, such as Artificial Intelligence (AI), and especially Agentic AI, across sectors;</u></b> HIGHLIGHTING the need to ensure that EU consumer law continues to</p>

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<p><b><u>business models and consumption patterns</u></b>; <del>RECOGNIZING that specific attention should be given to the protection of vulnerable consumers, in particular minors who are exposed to severe dangers and risks especially in the online world;</del></p>	<p>provide a high level of consumer protection <b>and empowerment</b> in the digital environment <b><u>in light of technological developments and rapidly evolving business models and consumption patterns</u></b>; <del>RECOGNIZING that specific attention should be given to the protection of vulnerable consumers, in particular minors who are exposed to severe dangers and risks especially in the online world;</del></p> <p>CZ  <b>(Comments):</b>                      It is not clear what is meant by “empowerment” in this context. We would rather have it deleted.</p> <p>DK  <b>(Comments):</b>                      DK: It is unclear what is meant by “<i>consumer relationships</i>”. Is it B2C relations?</p> <p>IE  <b>(Comments):</b>                      IE would like to see stronger reference to the proposed Digital Fairness Act as digital fairness is a key component of the Consumer Agenda 2030.</p> <p>NL  <b>(Drafting suggestions):</b>                      RECALLING the benefits the digital economy has brought to consumers, <del>while</del> <b><u>and the increasingly omnichannel nature of consumer relationships, the rapid evolution and increasing use of new digital technologies and tools, such as Artificial Intelligence (AI), and especially Agentie AI, across sectors;</u></b>                      HIGHLIGHTING the need to ensure that EU consumer law continues to provide a high level of consumer protection <b>and empowerment</b> in the digital environment <b><u>in light of technological developments and rapidly evolving business models and consumption patterns</u></b>; <del>RECOGNIZING that specific attention should be given to the protection of vulnerable consumers, in particular minors who are exposed to severe dangers and risks especially in the online world;</del></p>

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	NL (Comments): Too specific and detailed. We don't see Agentic AI being used in practice in consumer purchases.
<del>HIGHLIGHTING the rapid evolution and increasing use of new digital technologies and tools such as Artificial Intelligence (AI) across sectors, EMPHASIZING the importance to unlock the full potential of Digital Product Passports and AI for enforcement of product safety and consumer protection rules;</del>	
<u><b>RECOGNISING that specific attention should be given to the protection of vulnerable consumers, who are exposed to severe dangers and risks especially in the online world;</b></u>	DK (Drafting suggestions): <u><b>RECOGNISING that specific attention should be given to the protection of vulnerable consumers, in particular minors who are exposed to severe dangers and risks especially in the online world;</b></u> DK (Comments): DK: It is of decisive importance for DK that minors are reflected in the text to ensure that the wording more clearly reflects the need ensure adequate protection of minors online. HR (Comments): HR supports the addition to the text, since the relevance of dealing with the issue of vulnerable consumers in the context of consumer protection has already been pointed out in the previous comments that HR provided. HU (Drafting suggestions): <u><b>RECOGNISING that specific attention should be given to the protection of vulnerable consumers, who are exposed to severe dangers threats and risks especially in the online world;</b></u> LU

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	<p><b>(Drafting suggestions):</b>                      RECOGNISING that specific attention should be given to the protection of vulnerable consumers, who are exposed to severe dangers and risks especially in the online world;                      LU</p> <p><b>(Comments):</b>                      LU : When it comes to severe dangers and risks, the limitation to vulnerable Consumers only is too narrow. As other parts of the text already focus on vulnerable Consumers, this paragraph could be deleted. Alternatively, it should at least not be limited to vulnerable Consumers.</p>
<p><b><u>RECOGNISING that while certain consumers, such as minors, persons with disabilities and older persons, are considered vulnerable by definition, consumer vulnerability is also dynamic and context-dependent; therefore, HIGHLIGHTING the need to ensure, by design, the effective protection of vulnerable consumers and to address vulnerabilities linked to the cost of living and evolving asymmetries in consumer relationships;</u></b></p>	<p>CZ</p> <p><b>(Drafting suggestions):</b>  <b><u>RECOGNISING that while certain consumers, such as minors, persons with disabilities and older persons, are considered vulnerable by definition, consumer vulnerability is also dynamic and context-dependent; therefore, HIGHLIGHTING the need to ensure, by design, the effective protection of vulnerable consumers and to address vulnerabilities linked to the cost of living and evolving asymmetries in consumer relationships;</u></b></p> <p>CZ</p> <p><b>(Comments):</b>                      Although we agree that consumer protection should take into account cost of living, we do not support mentioning it in this place and context. Therefore, we suggest deleting it here. It is also mentioned in the introductory part (Recognising ...) and in paragraph 6; those ones we fully support.</p> <p>DK</p> <p><b>(Drafting suggestions):</b>  <b><u>RECOGNISING that while certain consumers, such as minors, persons with disabilities and older persons, are considered vulnerable by definition, consumer vulnerability is also dynamic and context-</u></b></p>

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	<p><u>dependent; therefore, HIGHLIGHTING the need to ensure, <del>by design,</del> the effective protection of vulnerable consumers and address consumer vulnerabilities linked to evolving digital asymmetries. HIGHLIGHTING the need and to address vulnerabilities linked to the cost of living and evolving asymmetries in consumer relationships;</u></p> <p>DK  <b>(Comments):</b>  <b>DK:</b> The wording “<i>are considered vulnerable</i>” seems more definite than the wording of paragraph 5. We prefer the wording of paragraph 5. Further, when to be considered vulnerable depends on the context. Therefore, “<i>by definition</i>” should be deleted.                      Regarding “<i>by design</i>”, does this refer to a “fairness by design” obligation? It is unclear if such an obligation would be appropriate as this should be considered further. We suggest to delete the reference.                      Regarding “<i>evolving asymmetries</i>”, we usually talk about asymmetries for consumers in the digital environment. This should be reflected in the wording in order for the text to be clearer.                      Further, same comment as above regarding “<i>consumer relationships</i>”. It is unclear what this means. Is it B2C relations?                      Regarding “<i>vulnerabilities linked to the cost of living</i>”, this does not concern the online protection of vulnerable consumers and should have its own paragraph.</p> <p>FI  <b>(Drafting suggestions):</b>  <u>RECOGNISING that while certain consumers, such as minors, persons with disabilities and older persons, are considered vulnerable by definition, consumer vulnerability is also dynamic and context-dependent; therefore, HIGHLIGHTING the need to ensure, by design, the effective protection of vulnerable consumers and to <del>by</del> addressing dynamic and context-dependent vulnerabilities, including the ones linked to the cost of living and evolving asymmetries in consumer relationships;</u></p>

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	<p>FI                      (Comments):                      The drafting seems incoherent.                      On one hand, we have the traditionally vulnerable consumer groups (e.g. children). In this context, it is quite OK to speak of ‘vulnerable consumers’. On the other hand, we have dynamic and context-dependent consumer <i>vulnerability</i>. In the context of dynamic consumer vulnerability, we should not speak of ‘vulnerable consumers’ as if such a group exists in this line of thinking: Instead, in this context, <i>every consumer</i> may be vulnerable because vulnerability is <i>dynamic</i> and <i>context-dependent</i>.</p> <p>HR                      (Comments):                      HR supports the addition to the text, since it corresponds with the proposals that HR has already provided (the need to broaden the scope of “consumer vulnerability”).</p> <p>HU                      (Drafting suggestions):  <u>RECOGNISING that while certain consumers, such as minors, persons with disabilities and older persons, are considered vulnerable by definition, consumer vulnerability is also dynamic and context-dependent; therefore, HIGHLIGHTING the need to ensure, by design, the effective protection of vulnerable consumers and to address vulnerabilities, including e-vulnerabilities, linked to the cost of living and evolving asymmetries in consumer relationships;</u></p> <p>NL                      (Drafting suggestions):  <u>RECOGNISING that while certain consumers, such as minors, persons with disabilities and older persons, are can be considered vulnerable by definition, consumer vulnerability is also dynamic and context-dependent; therefore, HIGHLIGHTING the need to ensure, by design, the effective protection of vulnerable consumers and to address</u></p>

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	<p><b><u>vulnerabilities linked to the cost of living and evolving asymmetries in consumer relationships;</u></b></p> <p>NL  <b>(Comments):</b>            Although we agree with the core of the points made, the text seems to indicate implicitly that the current definition of vulnerable consumers in consumer regulation might need to be amended. We are not convinced that this is necessary.</p> <p>PT  <b>(Drafting suggestions):</b>            RECOGNISING that while certain consumers, such as minors, persons with disabilities and older persons, are considered vulnerable by definition, consumer vulnerability is also dynamic and context-dependent; therefore, HIGHLIGHTING the need to ensure, by design, the effective protection of vulnerable consumers and effectively to address vulnerabilities linked to the cost of living and evolving asymmetries in consumer relationships;</p> <p>SE  <b>(Drafting suggestions):</b>  <b><u>RECOGNISING that while certain consumers, such as minors, persons with disabilities and older persons, are considered vulnerable by definition, consumer vulnerability is also dynamic and context-dependent; therefore, HIGHLIGHTING the need to ensure, by design, the effective protection of vulnerable consumers and to address vulnerabilities linked to the cost of living and evolving asymmetries in consumer relationships;</u></b></p> <p>SE  <b>(Comments):</b>            Cost of living is a central issue in people's lives that of course affects consumption. In SE, however, the issue of cost of living is not primarily a consumer policy issue but a fiscal and social policy issue. Against this background and taking into account the current legal basis, SE would like to remove “cost of living”.</p>

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	<p>SK  <b>(Drafting suggestions):</b>                      RECOGNISING that while certain consumers, such as minors, persons with disabilities and older persons, are considered vulnerable by definition, consumer vulnerability is also dynamic and context-dependent; therefore, HIGHLIGHTING the need to ensure, <del>by design,</del> the effective protection of vulnerable consumers <del>and to address vulnerabilities linked to the cost of living and evolving asymmetries in consumer relationships;</del></p> <p>SK  <b>(Comments):</b>                      We propose a more general wording. All types of vulnerabilities should be addressed.</p>
<p>RECALLING the exponential growth in e-commerce which changes profoundly the way consumers and businesses interact <del>with one another</del>; HIGHLIGHTING the surge of unsafe and otherwise <b>non-compliant consumer uncompliant</b> products circulating in the single market, mostly originating from outside of the EU and often marketed using misleading <b>and aggressive</b> techniques, <b>mainly through online platforms</b>; RECOGNISING this endangers consumers <b>and the environment, increases resource consumption</b> and exposes compliant European businesses to unfair competition;</p>	<p>CZ  <b>(Drafting suggestions):</b>                      RECALLING the exponential growth in e-commerce which changes profoundly the way consumers and businesses interact <del>with one another</del>; HIGHLIGHTING the surge of unsafe and otherwise <b>non-compliant consumer uncompliant</b> products circulating in the single market, mostly originating from outside of the EU and often marketed using misleading <b>and aggressive</b> techniques, <b>mainly including through online platforms</b>; RECOGNISING this endangers consumers <b>and the environment, increases resource consumption</b> and exposes compliant European businesses to unfair competition;</p> <p>CZ  <b>(Comments):</b>                      We are of the opinion that there is no evidence that unfair practices are used “<b>mainly</b>” by online platforms. We are afraid that such a statement may lead to conclusion that otherwise, shopping in online world is safe for consumers, i.e. without unfair practices. It might also evoke that the current rules, in particular the DSA are not sufficient enough. Therefore, we suggest replacing the term “mainly” by the term “including”.</p>

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	<p>HU                      (Drafting suggestions):                      RECALLING the exponential growth in e-commerce which changes profoundly the way consumers and businesses interact with one another;                      HIGHLIGHTING the surge of unsafe and otherwise <b><u>non-compliant consumer</u></b> uncompliant products circulating in the single market, mostly originating from outside of the EU and often marketed using misleading <b><u>and aggressive</u></b> techniques, <b><u>mainly through online platforms</u></b>; RECOGNISING this endangers consumers' <b><u>health, safety and economic interests and the environment, increases resource consumption</u></b> and exposes compliant European businesses to unfair competition;</p> <p>NL                      (Drafting suggestions):                      RECALLING the exponential growth in e-commerce which changes profoundly the way consumers and businesses interact <del>with one another</del>;                      HIGHLIGHTING the surge of unsafe and otherwise <b><u>non-compliant consumer</u></b> <del>uncompliant</del> products circulating in the <del>s</del>Single <del>m</del>Market, mostly originating from outside of the EU and often marketed using misleading <b><u>and aggressive</u></b> techniques, <del>mainly through online platforms</del>; RECOGNISING this endangers consumers <b><u>and the environment, increases resource consumption and</u></b>, exposes compliant European businesses to unfair competition, <b><u>and negatively impacts the environment</u></b>;</p> <p>NL                      (Comments):                      We also see a large influx of direct imports via e.g. dropshipping, so this flow of products is not solely through online platforms.</p> <p>SK                      (Drafting suggestions):                      RECALLING the exponential growth in e-commerce which changes profoundly the way consumers and businesses interact <del>with one another</del>;                      HIGHLIGHTING the surge of unsafe and otherwise <b><u>non-compliant consumer</u></b> <del>uncompliant</del> products circulating in the single market, mostly</p>

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	<p>originating from outside of the EU and often marketed using misleading <b>and aggressive</b> techniques, <b>mainly through online platforms</b>;</p> <p>SK (Comments): We propose deleting the reference to online platforms in this sentence. The safety and compliance issue also applies to other forms of electronic sales.</p>
<p><b><u>EMPHASISING the importance to exploit the full potential of digital tools such as Digital Product Passports and AI for enforcement of product safety and consumer protection rules, streamlining procedures and reducing burdens for businesses and authorities, while addressing disparities in enforcement capacities, and bridging the digital divide taking technology neutrality into account;</u></b></p>	<p>DK (Comments): DK: It is unclear what is meant by “bridging the digital divide taking technology neutrality into account”.</p> <p>HR (Drafting suggestions): <b><u>EMPHASISING the importance to exploit the full potential of digital tools such as Digital Product Passports and AI for enforcement of product safety and consumer protection rules, streamlining procedures and reducing burdens for businesses and authorities, while addressing disparities in enforcement capacities, and bridging the digital divide taking technology neutrality into account by ensuring the possibility of receiving relevant information for consumers through other, non-digital durable media;</u></b></p> <p>HR (Comments): HR proposes the addition to the proposed text, in order to safeguard the right of the consumers to receive relevant information by non-digital durable media as well.</p> <p>NL (Drafting suggestions): <b><u>EMPHASISING the importance to exploit the full potential of digital tools, such as Digital Product Passports and AI, for enforcement of product safety and consumer protection rules, streamlining procedures and reducing burdens for businesses and authorities, while addressing</u></b></p>

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	<p><u>disparities in enforcement capacities, and <del>bridging the digital divide</del> taking technology neutrality into account;</u> PT (Comments): We don't understand the intention behind the idea of "bridging the digital divide taking technology neutrality into account"</p>
<p>HIGHLIGHTING that strengthening consumer protection <u>and education</u>, <del>supporting consumers' well-being and</del> <u>as well as</u> promoting a level playing field for businesses will help achieve key EU objectives: <u>a more integrated Single Market</u>, promoting a fair transition to a green and digital economy and boosting competitiveness and economic growth with social cohesion;</p>	<p>DK (Drafting suggestions): HIGHLIGHTING that strengthening consumer protection <u>and education</u>, <del>supporting consumers' well-being and</del> <u>as well as</u> promoting a level playing field for businesses <del>will</del> <u>should</u> help achieve key EU objectives: <u>a more integrated Single Market</u>, promoting a fair transition to a green and digital economy and boosting competitiveness and economic growth with social cohesion;</p>
<p>HIGHLIGHTING that private consumption represents more than half of EU GDP, making consumer expenditure the single largest component of the EU GDP; <u>UNDERLINING that consumer purchasing decisions have a major impact on economy, jobs and social progress in the EU</u>; <del>RECOGNISING that the cost of living is a concern for many consumers across the European Union;</del></p>	<p>HR (Drafting suggestions): HIGHLIGHTING that private consumption represents more than half of EU GDP, making consumer expenditure the single largest component of the EU GDP; <u>UNDERLINING that consumer purchasing decisions have a major impact on economy, jobs and social progress in the EU</u>; <del>RECOGNISING that the cost of living is a concern for many consumers across the European Union;</del> HR (Comments): HR considers opportune to retrieve the part of the text that has been deleted from the proposal, since the fact that the costs of living is one of the more prominent concerns for the consumer within the EU. Therefore, this concern should be stressed out in the text. HU (Drafting suggestions):</p>

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	<p>HIGHLIGHTING that private consumption represents more than half of EU GDP, making consumer expenditure the single largest component of the EU GDP; <u>UNDERLINING that consumer purchasing decisions have a major impact on economy, jobs and social progress in the EU;</u> RECOGNISING that the cost of living is a concern for many consumers across the European Union;</p> <p>HU (Comments): Deletion recommended as the sentence has no added value and is hard to justify.</p> <p>NL (Drafting suggestions): HIGHLIGHTING that private consumption represents more than half of EU GDP, making consumer expenditure the single largest component of the EU GDP; <u>UNDERLINING that consumer purchasing decisions have a major impact on the economy, and jobs and social progress in the EU;</u> RECOGNISING that the cost of living is a concern for many consumers across the European Union;</p> <p>PT (Comments): We believe this should come earlier in the text (p. 4 eventually where there is a reference to vulnerable consumers)</p>
<p><b><u>RECOGNISING that certain commercial practices, including changes in product quantity or characteristics, particularly in packaged food and household products, without clear and prominent consumer information, may negatively affect price transparency and informed consumer decision-making;</u></b></p>	<p>DK (Comments): DK: This appears to belong under the numeric paragraphs and should be moved accordingly.</p> <p>HR (Comments): HR strongly supports the introduction of this addition, especially with regards to “shrinkflation”, as one of the frequent trade practices that might be considered as misleading.</p>

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	<p>HU                      (Drafting suggestions):  <u><b>RECOGNISING that certain commercial practices, including changes in product quantity or characteristics, particularly in packaged food and household products, without clear and prominent consumer information, may negatively affect price transparency and informed consumer decision-making;</b></u></p> <p>HU                      (Comments):                      Deletion recommended as the paragraph lacks strategic relevance and highlights a specific market practice.</p> <p>IT                      (Comments):                      We welcome the inclusion of the Italian proposal where we had envisaged it, namely in the recitals.</p> <p>NL                      (Drafting suggestions):  <u><b>RECOGNISING that certain commercial practices, including changes in product quantity or characteristics, particularly in packaged food and household products, such as consumer products without clear and prominent consumer information, may negatively affect price transparency and informed consumer decision-making;</b></u></p> <p>SK                      (Drafting suggestions):  <b>delete</b></p> <p>SK                      (Comments):                      We propose deleting this sentence; the issue of shrinkflation is not included in the Consumer Agenda 2030.</p>
<p>HIGHLIGHTING that the availability and affordability of sustainable goods and services are central not only to consumer well-being and environmental</p>	<p>FR                      (Drafting suggestions):</p>

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<p>protection, but also to the Union’s long-term competitiveness, <del>and open</del> strategic sovereignty <b>autonomy and increased resilience, and therefore should be stimulated</b>, by reducing dependence on unsustainable imports and helping to build resilient and sustainable value chains;</p>	<p>HIGHLIGHTING that the availability and affordability of sustainable goods and services are central not only to consumer well-being and environmental protection, but also to the Union’s long-term competitiveness, <del>and open</del> strategic sovereignty autonomy and increased resilience, and therefore should be stimulated, by reducing dependence on unsustainable imports and helping to build resilient and sustainable value chains;</p> <p>FR  <b>(Comments):</b>                      “Strategic autonomy” are words used in the conclusions adopted by the European Council in its conclusions of June 2025 and October 2025. If no agreement could be reached, the French authorities would propose this wording : HIGHLIGHTING that the availability and affordability of sustainable goods and services are central not only to consumer well-being and environmental protection, but also to the Union’s <b>objectives of</b> long-term competitiveness, and <b>open</b> strategic sovereignty autonomy <b>while preserving an open economy</b>, and increased resilience, and therefore should be stimulated, by reducing dependence on unsustainable imports and helping to build resilient and sustainable value chains;</p> <p>IE  <b>(Comments):</b>                      IE supports the inclusion of text referencing an open and strategic autonomy.</p> <p>PT  <b>(Comments):</b>                      Considering the topic, this should come earlier in the text, where there is already a reference to living costs and vulnerable consumers (p. 4)</p> <p>SE  <b>(Drafting suggestions):</b>                      HIGHLIGHTING that the availability and affordability of sustainable goods and services are central not only to consumer well-being and environmental protection, but also to the Union’s long-term competitiveness, <del>and open</del> strategic sovereignty <b>autonomy and increased resilience, and therefore</b></p>

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	<p><del>should be stimulated</del>, by reducing dependence on unsustainable imports and helping to build resilient and sustainable value chains;</p> <p>SE (Comments): It is unclear what the expression ‘unsustainable imports’ refers to. Since the assessment of which products are unsustainable or strategic has been made arbitrarily, it is important to be cautious about the conclusions drawn and the measures proposed to address any problematic dependencies or unsustainable imports. SE therefore proposes that the red marked text is removed. As an alternative solution, the wording “unsustainable imports” could be replaced by “high-risk dependencies”.</p>
<p>REITERATING the need for a horizontal approach to consumer protection policy, <b>which is</b> integrated and taken into account in defining and implementing other EU policies, in the light of the provisions of the Treaties regarding consumer protection;</p>	<p>DK (Drafting suggestions): REITERATING the need for a horizontal approach to consumer protection policy, <b>which is</b> integrated <del>and taken into account</del> <b>considered</b> in defining and implementing other EU policies, in the light of the provisions of the Treaties regarding consumer protection;</p> <p>PT (Drafting suggestions): REITERATING the need for a horizontal approach to consumer protection policy, <del>which is integrated and taken into account in defining and implementing</del> <b>and its integration in the definition and implementation of</b> other EU policies, in the light of the provisions of the Treaties regarding consumer protection;</p>
<p>THE COUNCIL OF THE EUROPEAN UNION,</p>	
<p>1. WELCOMES the adoption on 19 November 2025 of the Commission’s Communication on a ‘2030 Consumer Agenda and action plan for consumers in the single market: ‘A new impulse for</p>	<p>PL (Comments):</p>

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<p>consumer protection, competitiveness and sustainable growth’, which presents a vision for EU consumer policy from 2025 to 2030;</p>	<p>As regards points 1, 2, 4, 5, 6, 7, 9, 10, 11, 18, 19 and 20 – PL has no objections to the proposed wording of these points. As regards points 13, 14 and 16 – PL supports the proposed content.</p>
<p>2. UNDERLINES the importance of consumers as economic actors driving competition, innovation and sustainable progress with their consumer decisions; UNDERSCORES the importance of a strong and fair consumer protection framework <u>including consumer education</u> to maintain and augment consumer trust <u>and to ensure informed consumer decisions</u>, which is essential for a thriving economy. RECOGNISES furthermore the intrinsic social, protective and stabilizing dimension of consumer policy;</p>	<p>EL <b>(Drafting suggestions):</b> UNDERSCORES the importance of a strong and fair consumer protection framework <u>including consumer education and strengthening consumer awareness and culture</u> to maintain and augment consumer trust <u>and to ensure informed consumer decisions</u>, ”</p> <p>HR <b>(Comments):</b> HR is in favor of the addition to the text, since education contributes to raising awareness of consumers of consumer rights and obligations.</p> <p>NL <b>(Drafting suggestions):</b> UNDERLINES the importance of consumers as economic actors driving competition, innovation and sustainable progress with their consumer decisions; UNDERSCORES the importance of a strong and fair consumer protection framework <u>including consumer education</u> to maintain and augment consumer trust <u>and to ensure support informed consumer decisions</u>, which is essential for a thriving economy. RECOGNISES furthermore the intrinsic social, protective and stabilizing dimension of consumer policy;</p> <p>SK <b>(Drafting suggestions):</b> UNDERLINES the importance of consumers as economic actors driving competition, innovation and sustainable progress with their consumer decisions; UNDERSCORES the importance of a strong and fair consumer protection framework <u>including consumer education</u> to maintain and augment consumer trust <u>and to ensure support informed consumer</u></p>

1 <sup>st</sup> Compromise proposal	Drafting suggestions and Comments
	<p><b>decisions</b>, which is essential for a thriving economy. RECOGNISES furthermore the intrinsic social, protective and stabilizing dimension of consumer policy;                      SK                      (Comments):                      We do not think that the meaning "the framework can ensure informed consumer decisions" is correct. We recommend finding a more appropriate term than "ensure".</p>
<p>3. SUPPORTS the four key priority areas of the 2030 Consumer Agenda – completing the single market: an action plan for consumers, digital fairness and consumer protection online; sustainable consumption, and more effective enforcement and redress of consumer and product safety rules; SUPPORTS the two overarching priorities of the 2030 Consumer Agenda – protecting consumers in situations of vulnerability, and simplification and administrative burden reduction, and the accompanying actions intended to ensure and enhance the high level of consumer protection in the EU, to foster competitiveness, social fairness and sustainable growth;</p>	<p>IE                      (Drafting suggestions):                      IE SUPPORTS the four key priority areas of the 2030 Consumer Agenda – completing the single market: an action plan for consumers, digital fairness, <b>through the Digital Fairness Act</b>, and consumer protection online; sustainable consumption, and more effective enforcement and redress of consumer and product safety rules; SUPPORTS the two overarching priorities of the 2030 Consumer Agenda – protecting consumers in situations of vulnerability, and simplification and administrative burden reduction, and the accompanying actions intended to ensure and enhance the high level of consumer protection in the EU, to foster competitiveness, social fairness and sustainable growth;                      IE                      (Comments):                      IE wish to reiterate our position that there should be stronger references to the Digital Fairness Act, as the Digital Fairness Act is one of the key pillars of the Consumer Agenda.                      PL                      (Comments):                      We understand Presidency’s explanations regarding the nature of this paragraph and could withdraw our comment, provided that the issue is reflected, for example, in paragraph 15 or another relevant part in the text</p>

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	(simplification should not result in a lowering of the level of consumer protection).
<p>4. RECOGNISES <b><u>that</u></b> there are remaining barriers in the single market, <b><u>such as difficulties when purchasing cross-border mobility services, unjustified Territorial Supply Constraints and obstacles accessing financial services in another Member State,</u></b> that prevent consumers from fully taking advantage of the benefits it has to offer, and WELCOMES the Commission’s intention to address those barriers;</p>	<p>FR  <b>(Drafting suggestions):</b>                      RECOGNISES that there are remaining <b><u>unjustified</u></b> barriers in the single market, such as difficulties when purchasing cross-border mobility services, unjustified Territorial Supply Constraints and obstacles accessing financial services in another Member State, that prevent consumers from fully taking advantage of the benefits it has to offer, and WELCOMES the Commission’s intention to address those barriers;</p> <p>FR  <b>(Comments):</b>                      According to the French authorities, addressing barriers in the single market shall be a priority to ensure consumers the full advantage of all the benefits the single market has to offer when those barriers are unjustified. Indeed, there are still unjustified barriers within the single market, such as the differences among national regulations or the lack of confidence in product safety.</p> <p>HR  <b>(Comments):</b>                      HR strongly supports the addition to the text, especially with regards to territorial supply constraints, as one of the more prominent barriers which demands addressing.</p> <p>LU  <b>(Drafting suggestions):</b>                      RECOGNISES <b><u>that</u></b> there are <del>remaining</del> barriers in the single market, <b><u>such as difficulties when purchasing cross-border mobility services, unjustified Territorial Supply Constraints and obstacles accessing financial services in another Member State,</u></b> that prevent consumers from fully taking advantage of the benefits it has to offer, and WELCOMES the Commission’s <b><u>intention to remove the most harmful Single Market</u></b></p>

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	<p><b><u>barriers (“Terrible Ten”) and to improve the enforcement of existing EU rules</u></b> address those barriers;                      LU                      (Comments):                      LU: The scope of paragraph 4 should cover barriers of the single market, to the access of all products and services. The Commission’s action should be focused on the removal of the Terrible Ten and the improvement of existing EU rules before adopting new ones.</p>
<p>5. RECOGNISES the need to <b><u>address possible</u></b> <del>fill existing</del> <b><u>regulatory</u></b> gaps, <b><u>including with regards to enforcement</u></b> and <del>reducing</del> <b><u>potential</u></b> legal uncertainty, <b><u>building on the findings of the Fitness Check of EU Consumer Law on Digital Fairness<sup>9</sup> in order</u></b> to further strengthen the protection of consumers <b><u>in digital</u></b> <del>online</del> <b><u>environments</u></b> against practices such as deceptive or manipulative interface design (<b><u>so-called “dark patterns”</u></b>), addictive design features, problematic practices by influencers, unfair personalization that exploit consumers’ vulnerabilities, <b><u>non-transparent dynamic pricing practices and other</u></b> problematic features in digital products, <b><u>such as video games; WELCOMES the Commission’s intention to propose a Digital Fairness Act (DFA) to achieve these objectives</u></b> with a particular attention to the most vulnerable consumers, especially minors, who need further protection in the digital environment;</p>	<p>CZ                      (Drafting suggestions):                      RECOGNISES the need to <b><u>address possible</u></b> <del>fill existing</del> <b><u>regulatory</u></b> gaps, <b><u>including with regards to enforcement</u></b> and <del>reducing</del> <b><u>potential</u></b> legal uncertainty, <b><u>building on the findings of the Fitness Check of EU Consumer Law on Digital Fairness<sup>9</sup> in order</u></b> to further strengthen the protection of consumers <b><u>in digital</u></b> <del>online</del> <b><u>environments</u></b> against practices such as deceptive or manipulative interface design (<b><u>so-called “dark patterns”</u></b>), addictive design features, problematic practices by influencers, unfair personalization that exploit consumers’ vulnerabilities, <b><u>non-transparent dynamic pricing practices and other</u></b> problematic features in digital products, <b><u>such as video games; WELCOMES the Commission’s intention to evaluate current regulatory instruments and if appropriate, to propose a Digital Fairness Act (DFA) to achieve these objectives</u></b> with a particular attention to the most vulnerable consumers, especially minors, who need further protection in the digital environment;                      CZ                      (Comments):                      Despite the Presidency explanation and assurance in Flash, we disagree with this addition. As mentioned already, CZ is of the opinion that the Council’s conclusions should be rather of a general nature. For the sake of compromise, we suggest an addition to the text.                      DK</p>

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	<p><b>(Drafting suggestions):</b>                      RECOGNISES the need to <b><u>address possible</u></b> <del>fill existing</del> <b><u>regulatory</u></b> gaps, <b><u>including with regards to enforcement</u></b> and <del>reducing</del> <b><u>potential</u></b> legal uncertainty, <b><u>building on the findings of the Fitness Check of EU Consumer Law on Digital Fairness<sup>9</sup></u></b> in order to further strengthen the protection of consumers <b><u>in digital</u></b> <del>online</del> <b><u>environments</u></b> against practices such as deceptive or manipulative interface design (<b><u>so-called “dark patterns”</u></b>), addictive design features, problematic practices by influencers, unfair personalization that exploit consumers’ vulnerabilities, <b><u>non-transparent dynamic pricing practices and other</u></b> problematic features in digital products, <b><u>such as video games; WELCOMES the Commission’s intention to propose a Digital Fairness Act (DFA) to achieve these objectives</u></b> with a particular attention to the most vulnerable consumers, especially minors, who need further protection in the digital environment; <b><u>CALLS on the Commission to pay particular attention to the protection of minors in preparation of the Digital Fairness Act as minors need further protection in the digital environment.</u></b></p> <p>DK</p> <p><b>(Comments):</b>  <b>DK:</b> It is of decisive importance for DK to maintain the reference to minors in the paragraph regarding the DFA.</p> <p>FI</p> <p><b>(Drafting suggestions):</b>                      RECOGNISES the need to <b><u>address possible</u></b> <del>fill existing</del> <b><u>regulatory</u></b> gaps, <b><u>including with regards to enforcement</u></b> and <del>reducing</del> <b><u>potential</u></b> legal uncertainty, <b><u>building on the findings of the Fitness Check of EU Consumer Law on Digital Fairness<sup>9</sup></u></b> in order to further strengthen the protection of consumers <b><u>in digital</u></b> <del>online</del> <b><u>environments</u></b> against practices such as deceptive or manipulative interface design (<b><u>so-called “dark patterns”</u></b>), addictive design features, problematic practices by influencers, unfair personalization that exploit consumers’ vulnerabilities, <b><u>non-transparent dynamic pricing practices and other</u></b> problematic features in</p>

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	<p>digital products, <del>such as video games</del>; <b><u>WELCOMES the Commission’s intention to propose a Digital Fairness Act (DFA) to achieve these objectives</u></b></p> <p>FI  <b>(Comments):</b>                      No single field should be singled out here. <b>Finland must insist on the deletion</b> of the wording ‘such as video games’.</p> <p>FR  <b>(Drafting suggestions):</b>                      RECOGNISES the need to address possible regulatory gaps, including with regards to enforcement and potential legal uncertainty, building on the findings of the Fitness Check of EU Consumer Law on Digital Fairness<sup>9</sup> in order to further strengthen the protection of consumers in digital environments against practices such as deceptive or manipulative interface design (so-called “dark patterns”), addictive design features, problematic practices by influencers, unfair personalization that exploit consumers’ vulnerabilities, non-transparent dynamic pricing practices and other problematic features in digital products, such as video games; <b>WELCOMES the Commission’s intention to propose a Digital Fairness Act (DFA) to achieve these objectives <u>and to mobilize other levers, including those identified hereafter</u></b>;</p> <p>FR  <b>(Comments):</b>                      The DFA could contribute to address e-commerce challenges and ensure a level-playing field across the board in the digital environment. However, it seems that the proposals which are now being considered within the scope of the DFA would be a substantial contribution – but not the only solution – to achieve those objectives. The French authorities therefore suggest a small clarification of the wording, together with the mention of the mobilization of other levers, mentioned hereafter in the conclusions.</p> <p>HR  <b>(Drafting suggestions):</b></p>

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	<p>RECOGNISES the need to <del>address possible</del> <b>remaining</b> <del>fill existing</del> <b>regulatory gaps, including with regards to enforcement</b> and <del>reducing</del> <b>potential</b> legal uncertainty, <b>building on the findings of the Fitness Check of EU Consumer Law on Digital Fairness<sup>9</sup> in order</b> to further strengthen the protection of consumers <del>in digital</del> <b>online environments</b> against practices such as deceptive or manipulative interface design (<b>so-called “dark patterns”</b>), addictive design features, problematic practices by influencers, unfair personalization that exploit consumers’ vulnerabilities, <b>non-transparent dynamic pricing practices and other</b> problematic features in digital products, <b>such as video games; WELCOMES the Commission’s intention to propose a Digital Fairness Act (DFA) to achieve these objectives</b> with a particular attention to the most vulnerable consumers, especially minors, who need further protection in the digital environment;</p> <p>HR  <b>(Comments):</b>                      HR generally supports the additions made to the text. However, for reason of clarity and consistency with the text, HR supports the proposition of HU in addressing “remaining regulatory gaps”, since it better corresponds with the rest of the text. Namely, the Fitness Check of EU Consumer Law on Digital Fairness has already established the gaps, and therefore the wording “remaining” better reflects the content of this Paragraph.                      HU  <b>(Drafting suggestions):</b>                      5. RECOGNISES the need to <del>address possible</del> <b>remaining</b> <del>fill existing</del> <b>regulatory gaps, including with regards to enforcement</b> and <del>reducing</del> <b>potential</b> legal uncertainty, <b>building on the findings of the Fitness Check of EU Consumer Law on Digital Fairness<sup>9</sup> in order</b> to further strengthen the protection of consumers <del>in digital</del> <b>online environments</b> against practices such as deceptive or manipulative interface design (<b>so-called “dark patterns”</b>), addictive design features, problematic practices by influencers, unfair personalization that exploit consumers’ vulnerabilities, <b>non-</b></p>

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	<p><u>transparent dynamic pricing practices and other</u> problematic features in digital products, <u>such as video games</u>; <b>WELCOMES the Commission’s intention to propose a Digital Fairness Act (DFA) to achieve these objectives</b> with a particular attention to the most vulnerable consumers, especially minors, who need further protection in the digital environment;</p> <p>IT</p> <p><b>(Drafting suggestions):</b></p> <p>5. RECOGNISES the need to <b>address possible</b> <del>fill existing</del> <b>regulatory</b> gaps, <b>including with regards to enforcement</b> and <del>reducing</del> <b>potential</b> legal uncertainty, <b>building on the findings of the Fitness Check of EU Consumer Law on Digital Fairness<sup>9</sup></b> in order to further strengthen the protection of consumers <b>in digital</b> <del>online</del> <b>environments</b> against practices such as deceptive or manipulative interface design (<b>so-called “dark patterns”</b>), addictive design features, problematic practices by influencers, unfair personalization that exploit consumers’ vulnerabilities, <b>non-transparent dynamic pricing practices and other</b> problematic features in digital products, <u>such as video games</u> <b>(ADD IT POPOSAL)</b> or deceptive practices such as fake or manipulated consumer reviews, in particular when generated or amplified by artificial intelligence tools.</p> <p>IT</p> <p><b>(Comments):</b></p> <p>We ask for the inclusion of additional examples, beyond that of video games. In this regard, it should be noted that the concept of deceptive practices, such as fake or manipulated consumer reviews, in particular when generated or amplified by artificial intelligence tools, already flagged by Italy in previous written comments, has not been considered.</p> <p>We therefore ask for the insertion, at this point after the word “games”, of the beside phrase.</p> <p>LU</p> <p><b>(Drafting suggestions):</b></p>

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	<p>RECOGNISES the need to <u>address possible</u> <del>fill existing regulatory</del> gaps, <u>including with regards to enforcement</u> and <del>reducing potential</del> legal uncertainty, <u>building on the findings of the Fitness Check of EU Consumer Law on Digital Fairness<sup>9</sup> in order</u> to further strengthen the protection <u>and education</u> of consumers <u>in digital</u> <del>online</del> <u>environments</u> against practices such as deceptive or manipulative interface design (<u>so-called “dark patterns”</u>), addictive design features, problematic practices by influencers, unfair personalization that exploit consumers’ vulnerabilities, <u>non-transparent dynamic pricing practices and other</u> problematic features in digital products, <del>such as video games</del>; <u>WELCOMES the Commission to fully take into account these objectives when designing the Digital Fairness Act (DFA); the Commission’s intention to propose a Digital Fairness Act (DFA) to achieve these objectives</u> with a particular attention to the most vulnerable consumers, especially minors, who need further protection in the digital environment;</p> <p>LU  <b>(Comments):</b>                      LU: The wording of this paragraph seems to prejudge the impact assessment and the results of the public consultation for the preparation of the DFA proposal. It should be worded differently to take into account the analysis and responses to any points raised. This will clarify whether the rules are fit for purpose and allow for a more open and dynamic draft.</p> <p>NL  <b>(Drafting suggestions):</b>                      RECOGNISES the need to <u>address possible</u> <del>fill existing regulatory</del> gaps, <u>including with regards to enforcement</u> and <del>reducing potential</del> legal uncertainty, <u>building on the findings of the Fitness Check of EU Consumer Law on Digital Fairness<sup>9</sup> in order</u> to further strengthen the protection of consumers <u>in the digital</u> <del>online</del> <u>environments</u> against practices such as deceptive or manipulative interface design (<u>so-called “dark patterns”</u>), addictive design features, problematic practices by influencers, unfair personalization that exploit consumers’ vulnerabilities, <u>non-</u></p>

1 <sup>st</sup> Compromise proposal	Drafting suggestions and Comments
	<p><u>transparent dynamic pricing practices and other</u> problematic features in digital products, <u>such as video games; WELCOMES the Commission’s intention to scheduled proposal for a Digital Fairness Act (DFA) to achieve these objectives</u> with a particular attention to the most vulnerable consumers, especially minors, who need further protection in the digital environment;</p> <p>NL  <b>(Comments):</b>                      “Possible” contradicts “including with regards to enforcement and potential legal uncertainty”</p> <p>SE  <b>(Drafting suggestions):</b>                      RECOGNISES the need to <u>address possible</u> <del>fill existing regulatory</del> gaps, <u>including with regards to enforcement</u> and <del>reducing potential</del> legal uncertainty, <u>building on the findings of the Fitness Check of EU Consumer Law on Digital Fairness<sup>9</sup> in order</u> to further strengthen the protection of consumers <u>in digital</u> <del>online</del> <u>environments</u> against practices such as deceptive or manipulative interface design (<u>so-called</u> “dark patterns”), addictive design features, problematic practices by influencers, unfair personalization that exploit consumers’ vulnerabilities, <u>non-transparent dynamic pricing practices and other</u> problematic features in digital products, <u>such as video games; WELCOMES the Commission’s intention to propose a Digital Fairness Act (DFA) to achieve these objectives</u> with a particular attention to the most vulnerable consumers, especially minors, who need further protection in the digital environment;</p> <p>SE  <b>(Comments):</b>                      SE suggests that the word “other” and a comma is removed, i.e. “non-transparent dynamic pricing practices and problematic features in digital products such as video games”. The purpose is to avoid that the wording is perceived as if all of the methods listed (e.g. “problematic practices by influencers”) relate solely or specifically to video games.</p>

1 <sup>st</sup> Compromise proposal	Drafting suggestions and Comments
	<p>SK                      (Drafting suggestions):                      RECOGNISES the need to <b>address possible</b> <del>fill existing</del> <b>regulatory gaps, including with regards to enforcement</b> and <del>reducing potential</del> legal uncertainty, <b>building on the findings of the Fitness Check of EU Consumer Law on Digital Fairness<sup>9</sup></b> in order to further strengthen the protection of consumers <b>in digital online environments against unfair and manipulative practices that undermine free and informed consumer choice.</b></p> <p>SK                      (Comments):                      The document should define the strategic objective (fair environment) rather than listing technical details that evolve rapidly with technology.</p>
<p>6. RECOGNISES that <b><u>while characteristics such as age or disability render some consumers vulnerable,</u></b> consumer vulnerability is a dynamic concept, which is <del>not exclusively linked to characteristics such as age or disability,</del> but may also arise from <b><u>information asymmetries and structural imbalances in consumer-business relationships, as well as</u></b> adverse personal circumstances which, if subject to unfair commercial exploitation, may materially affect consumer behaviour; <b><u>UNDERLINES that the protection of consumers in vulnerable situations also includes tackling the impact of the high cost of living, in particular the increasing difficulties to afford basic needs; STRESSES the need to prevent and address abusive pricing practices affecting essential goods and services, in particular during declared emergencies, where existing or contextual consumer vulnerabilities may be heightened;</u></b></p>	<p>AT                      (Drafting suggestions):                      RECOGNISES that while characteristics such as age or disability render some consumers vulnerable, consumer vulnerability is a dynamic concept <b><u>also taken into account by the dynamic concept of the average consumer,</u></b> which may also arise from information asymmetries and structural imbalances in consumer-business relationships, as well as adverse personal circumstances which, if subject to unfair commercial exploitation, may materially affect consumer behaviour; <b><u>UNDERLINES that the protection of consumers in vulnerable situations also includes [...]</u></b></p> <p>AT                      (Comments):                      As the concept of the average consumer under the Unfair Commercial Practice Directive 2005/29/EC is very relevant to the question of the protection of vulnerable consumers, we propose that reference is made to it in this paragraph.</p> <p>DK                      (Drafting suggestions):</p>

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	<p>RECOGNISES that <u>while characteristics such as age or disability render some consumers vulnerable</u>, consumer vulnerability is a dynamic concept, which is not exclusively linked to characteristics such as age or disability, but may also arise from <u>information asymmetries and structural imbalances in consumer-business relationships, as well as</u> adverse personal circumstances which, if subject to unfair commercial exploitation, may materially affect consumer behaviour; <b><u>EMPHASISES the need to ensure a high level of protection for all consumers, with particular attention to those most vulnerable, especially minors.</u></b></p> <p><del>UNDERLINES that the protection of consumers in vulnerable situations also includes tackling the impact of the high cost of living, in particular the increasing difficulties to afford basic needs; STRESSES the need to prevent and address abusive pricing practices affecting essential goods and services, in particular during declared emergencies, where existing or contextual consumer vulnerabilities may be heightened;</del></p> <p>EL</p> <p><b>(Comments):</b></p> <p>To our point of view it would be useful to clarify what is meant by the term “<i>vulnerable consumer</i>.” Do the relevant characteristics relate solely to age and disability, or are there additional factors that may render a consumer vulnerable? For example, vulnerability may also arise from personal, social, or economic circumstances that increase a consumer’s susceptibility in the marketplace, such as: Age (children, elderly people), Disability (physical, mental, or cognitive), Low income or financial distress, Low educational attainment or limited literacy, Language barriers, Lack of digital skills, Health-related issues, Stressful life situations (e.g. unemployment, migration, or debt).</p> <p>HU</p> <p><b>(Drafting suggestions):</b></p> <p>6. RECOGNISES that <u>while characteristics such as age or disability render some consumers vulnerable</u>, consumer vulnerability is a dynamic concept, which is not exclusively linked to characteristics such as age or</p>

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	<p>disability, but may also arise from <b><u>information asymmetries and structural imbalances in consumer-business relationships, as well as</u></b> adverse personal circumstances which, if subject to unfair commercial exploitation, may materially affect consumer behaviour; <b><u>UNDERLINES that the protection of consumers in vulnerable situations also includes tackling the impact of the high cost of living, in particular the increasing difficulties to afford basic needs, as well as the lack of digital skills or limited digital literacy</u></b>; <b><u>STRESSES the need to prevent and address abusive pricing practices affecting essential goods and services, in particular during declared emergencies, where existing or contextual consumer vulnerabilities may be heightened</u></b>;</p> <p>LU  <b>(Drafting suggestions):</b>            UNDERLINES that the protection of consumers in vulnerable situations also includes tackling the impact of the high cost of living, in particular the increasing difficulties to afford basic needs; STRESSES the need to prevent and address abusive pricing practices, <b><u>such as drip pricing and personalised prices especially those</u></b> affecting essential goods and services, in particular during declared emergencies, where existing or contextual consumer vulnerabilities may be heightened;</p> <p>LU  <b>(Comments):</b>            “abusive” price practices should be prevented and addressed at all times, linking the prevention and enforcement to declared emergencies and only to essential goods and services would send the wrongful message that such practices are otherwise acceptable.</p> <p>NL  <b>(Drafting suggestions):</b>            RECOGNISES that <b><u>while characteristics such as age or disability render some consumers vulnerable</u></b>, consumer vulnerability is a dynamic concept, which is not exclusively linked to characteristics such as age or disability, but may also arise from <b><u>information asymmetries and structural imbalances</u></b></p>

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	<p><del>in consumer–business relationships, as well as</del> adverse personal circumstances which, if subject to unfair commercial exploitation, may materially affect consumer behaviour; <b><u>UNDERLINES that the protection of consumers in vulnerable situations also includes tackling the impact of the high cost of living, in particular the increasing difficulties to afford basic needs; STRESSES the need to prevent and address abusive pricing practices affecting essential goods and services, in particular during declared emergencies, where existing or contextual consumer vulnerabilities may be heightened;</u></b></p> <p>NL  <b>(Comments):</b>                  Too detailed.</p> <p>SE  <b>(Drafting suggestions):</b>                  RECOGNISES that <b><u>while characteristics such as age or disability render some consumers vulnerable,</u></b> consumer vulnerability is a dynamic concept, which is not exclusively linked to characteristics such as age or disability, but may also arise from <b><u>information asymmetries and structural imbalances in consumer–business relationships, as well as</u></b> adverse personal circumstances which, if subject to unfair commercial exploitation, may materially affect consumer behaviour; <b><u>UNDERLINES that the protection of consumers in vulnerable situations also includes tackling the impact of the high cost of living, in particular the increasing difficulties to afford basic needs; STRESSES the need to prevent and address abusive pricing practices affecting essential goods and services, in particular during declared emergencies, where existing or contextual consumer vulnerabilities may be heightened;</u></b></p> <p>SE  <b>(Comments):</b>                  As mentioned above, cost of living is a central issue in people's lives that of course affects consumption. In SE, however, the issue of cost of living is not primarily a consumer policy issue but a fiscal and social policy issue. We</p>

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	<p>view the issue of pricing of basic goods in times of crisis in a similar way. “Abusive pricing practices” is not a concept within the current consumer legislation. There is basically free pricing where supply and demand are allowed to govern, but rules on marketing methods and price information must be followed. Restrictions on free pricing as such fall, as far as we see it, primarily within other policy areas. Against this background and taking into account the current legal basis, SE would like to remove the red marked text.</p> <p>SK</p> <p><b>(Drafting suggestions):</b></p> <p>RECOGNISES that <u>while characteristics such as age or disability render some consumers vulnerable</u>, consumer vulnerability is a dynamic concept, <del>which is not exclusively linked to characteristics such as age or disability, but may also arise from <u>information asymmetries and structural imbalances in consumer-business relationships, as well as</u> adverse personal circumstances which, if subject to unfair commercial exploitation, may materially affect consumer behaviour</del>; <b>UNDERLINES that the protection of consumers in vulnerable situations also includes tackling the impact of the high cost of living, in particular the increasing difficulties to afford basic needs; STRESSES the need to prevent and address abusive pricing practices affecting essential goods and services, in particular during declared emergencies, where existing or contextual consumer vulnerabilities may be heightened;</b></p> <p>SK</p> <p><b>(Comments):</b></p> <p>We prefer to refer to the concept of vulnerable consumers in more general wording in the Council Conclusions and leave details about content, scope, etc. for further discussion.</p>
	<p>DK</p> <p><b>(Drafting suggestions):</b></p> <p><b>7. UNDERLINES that the protection of consumers in vulnerable situations also includes tackling the impact of the high cost of living, in particular the increasing difficulties to afford basic needs; STRESSES</b></p>

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	<p><u>the need to prevent and address abusive pricing practices affecting essential goods and services, in particular during declared emergencies, where existing or contextual consumer vulnerabilities may be heightened:</u>                      DK                      (Comments):                      DK: This is a more specific discussion about vulnerability. We suggest to divide paragraph 6.</p>
<p>7. <u>EMPHASISES the need to ensure a high level of protection for all consumers, with particular attention to those most vulnerable, especially minors, who require enhanced safeguards in the digital environment; CALLS on the Commission to pay particular attention to the protection of minors online in preparation of the DFA;</u></p>	<p>DK                      (Drafting suggestions):  <del><u>EMPHASISES the need to ensure a high level of protection for all consumers, with particular attention to those most vulnerable, especially minors, who require enhanced safeguards in the digital environment; CALLS on the Commission to pay particular attention to the protection of minors online in preparation of the DFA;</u></del>                      DK                      (Comments):                      DK: We suggest to delete this paragraph and to have it covered by paragraph 5 and 6 as suggested above.                      HR                      (Comments):                      HR supports the addition of this paragraph, putting special emphasis on the protection of minors in the digital context.                      LU                      (Drafting suggestions):                      EMPHASISES the need to ensure a high level of protection for all consumers, with particular attention to those most vulnerable, especially minors, who require enhanced safeguards in the digital environment; CALLS on the Commission to pay particular attention to the protection of minors online in preparation of the DFA, <u>ensuring full consistency with the safeguards for minors established under the Digital Services Act;</u>                      LU</p>

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	<p><b>(Comments):</b>                      LU: As referred under paragraphs 8 and 14, the consumer protection EU law has a horizontal nature and must be in coherence with existing legislative acts. As the DSA establishes safeguards for minors online, the DFA should stay in consistency and in complementarity with these rules.                      NL</p> <p><b>(Drafting suggestions):</b>  <u><b>EMPHASISES the need to ensure a high level of protection for all consumers, with particular attention to those most vulnerable, especially minors, who require enhanced safeguards in the digital environment; CALLS on the Commission to pay particular attention to the protection of minors online in preparation of the DFA;</b></u>                      NL</p> <p><b>(Comments):</b>                      Of course we agree that minors often are vulnerable consumers, but we note that young adults and other consumers can also be vulnerable to specific business practices, such as in the gaming sector. Therefore, at this point we are not necessary in favor of policy measures within the DFA that focus exclusively on minors. This can also create enforcement difficulties.</p>
<p>8. RECALLS <u>that consumer protection requirements shall be taken into account in defining and implementing other Union policies and activities; CALLS ON the Commission to preserve</u> the horizontal nature of consumer law; STRESSES the need <del>for</del> <u>to ensure both coherence and complementarity</u> between EU law on consumer protection <u>law, especially the Unfair Commercial Practices Directive and the EU law on digital markets Digital Rulebook including</u> such as the Digital Services Act, <u>the AI Act, the Audiovisual Media Services Directive</u> and the Digital Markets Act, in order to establish <u>safeguard</u> a high level of consumer protection and a level-playing field across the board in the digital environment; <del>CALLS on the Commission to propose a Digital Fairness Act to achieve these</del></p>	<p>FR</p> <p><b>(Comments):</b>                      In the interest of consistency, the French authorities suggest moving paragraph 8 just before paragraph 5 as they both deal with digital issues. They emphasize that the current regulations especially the ones regarding digital markets, including the DSA, shall be fully implemented.                      HU</p> <p><b>(Drafting suggestions):</b>                      8. RECALLS <u>that consumer protection requirements shall be taken into account in defining and implementing other Union policies and activities; CALLS ON the Commission to preserve</u> the horizontal nature of consumer law; STRESSES the need <del>for</del> <u>to ensure both coherence, synergy</u></p>

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<p>objectives;</p>	<p><b>and complementarity</b> between EU law on consumer protection <b>law, especially the Unfair Commercial Practices Directive</b> and <b>the EU law on digital markets Digital Rulebook including</b> such as the Digital Services Act, <b>the AI Act, the Audiovisual Media Services Directive</b> and the Digital Markets Act, in order to establish <b>safeguard</b> a high level of consumer protection and a level-playing field across the board in the digital environment; <del>CALLS on the Commission to propose a Digital Fairness Act to achieve these objectives;</del></p> <p>IE  <b>(Comments):</b>                  IE wish to reiterate our position that there should be stronger references to the Digital Fairness Act, and previously removed text, referencing the Digital Fairness Act, be re-instated, as the Act forms an integral part of the Consumer Agenda 2030.</p> <p>LU  <b>(Drafting suggestions):</b>                  8. RECALLS that consumer protection requirements shall be taken into account in defining and implementing other Union policies and activities; <del>CALLS ON the Commission to preserve the horizontal nature of consumer law</del> <b>to ensure that, in the preparation of new initiatives, the horizontal nature of consumer law is preserved, coherence with existing legislative acts is ensured by avoiding overlaps, the need for legislative proposals is assessed carefully and proposals are underpinned by appropriate impact assessments in accordance with the principles of better regulation, including assessment of enforceability, while the well-functioning of the Single Market is maintained through the achievement of maintaining and promoting a high level of consumer protection;</b>                  STRESSES the need to ensure both coherence and complementarity between EU consumer protection law, especially the Unfair Commercial Practices Directive and the EU-Digital Rulebook including the Digital Services Act, the AI Act, the Audiovisual Media Services Directive and the Digital Markets</p>

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	<p>Act, in order to <del>establish</del>-safeguard a high level of consumer protection and a level-playing field across the board in the digital environment;</p> <p>LU  <b>(Comments):</b>                      LU: Point 14 has been moved to point 8 to avoid duplication and to emphasise the importance of maintaining the horizontal nature of EU consumer law.</p> <p>PL  <b>(Comments):</b>                      PL draws attention to the fact that the coherence and complementarity referred to in point 8 should apply not only to the existing legislation mentioned in that point, but in particular to new initiatives. Ensuring coherence and consistency is of particular importance for initiatives whose publication has been announced in the Agenda. It is essential that their preparation be preceded by an appropriate impact assessment and that the proposed solutions do not duplicate obligations that already exist.</p> <p>SK  <b>(Drafting suggestions):</b>                      RECALLS <b><u>that consumer protection requirements shall be taken into account in defining and implementing other Union policies and activities; CALLS ON the Commission to preserve</u></b> the horizontal nature of consumer law; STRESSES the need <del>for</del> <b><u>to ensure coherence and complementarity with the relevant Union legal framework for the digital environment to avoid duplication and ensure legal certainty.</u></b></p> <p>SK  <b>(Comments):</b>                      A high-level political document should emphasize the principle of coherence rather than containing an overly detailed enumeration of existing legislative acts.</p>
<p>9. ENCOURAGES the Commission to <b><u>continue its work to enable consumers to play a more active role</u></b> <del>include consumers</del> in the shift</p>	<p>AT  <b>(Drafting suggestions):</b></p>

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<p>towards a circular economy, by promoting safe, sustainable, affordable and trusted circular offers, including second-hand, repaired, refurbished and remanufactured goods and product-as-a-service models, by addressing social <del>and</del> behavioural <del>and product-safety</del> barriers to their uptake, <u>by addressing emerging business models that encourage overconsumption</u>, by fostering ‘green by design’ e-commerce solutions and by enabling easy access to <u>relevant</u> product information through Digital Product Passports <u>and other durable mediums</u>; <u>RECALLS that consumers need accurate, reliable, comparable, and verifiable environmental claims to make informed decisions, where the substantiation and verification of environmental claims and labels contributes to the EU's green transition to a circular and clean economy;</u></p>	<p>[...]  RECALLS that consumers need <b>accurate, clear, fair, understandable and reliable, comparable, and verifiable</b> environmental claims to make informed decisions, <del>where the substantiation and verification of environmental claims and labels to</del> contributes to the EU's green transition to a circular and clean economy;  AT  <b>(Comments):</b>  As this specific point is a politically sensitive issue, we propose using a wording that is primarily based on that of the Empowerment of Consumers Directive (see recital 1 of the Directive).  DK  <b>(Drafting suggestions):</b>  ENCOURAGES the Commission to <u>continue its work to enable consumers to play a more active role</u> <del>include consumers in</del> the shift towards a circular economy, by promoting safe, sustainable, affordable and trusted circular offers, including second-hand, repaired, refurbished and remanufactured goods and product-as-a-service models, by addressing social <del>and</del> <del>behavioural</del> <b>behavioral</b> and product-safety barriers to their uptake, <u>by addressing emerging business models that encourage overconsumption</u>, by fostering ‘green by design’ e-commerce solutions and by enabling easy access to <u>relevant</u> product information through Digital Product Passports <u>and other durable mediums</u>; <u>RECALLS that consumers need accurate, reliable, comparable, and verifiable environmental claims to make informed decisions, where the substantiation and verification of environmental claims and labels contributes to the EU's green transition to a circular and clean economy;</u>  ES  <b>(Drafting suggestions):</b>  <u>RECALLS that environmental claims and labels contribute to the EU's green transition towards a circular and clean economy; recalls that consumers need accurate, reliable and well-founded environmental</u></p>

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	<p><b><u>claims to make informed decisions; UNDERLINES that robust and credible claims are essential to prevent distortions of competition, protect compliant traders and maintain trust in the internal market; and notes that clarity and consistency are key to ensuring legal certainty for all market participants.</u></b></p> <p>FR  <b>(Comments):</b>                      In the event that there was no agreement on the wording of the last sentence of the paragraph, the French authorities would suggest to suppress the second part of the last sentence of the paragraph:                      ENCOURAGES the Commission to continue its work to enable consumers to play a more active role in the shift towards a circular economy, by promoting safe, sustainable, affordable and trusted circular offers, including second-hand, repaired, refurbished and remanufactured goods and product-as-a-service models, by addressing social and behavioural barriers to their uptake, by addressing emerging business models that encourage overconsumption, by fostering ‘green by design’ e-commerce solutions and by enabling easy access to relevant product information through Digital Product Passports and other durable mediums; RECALLS that consumers need accurate, reliable, comparable, and verifiable environmental claims to make informed decisions, <del>where the substantiation and verification of environmental claims and labels contributes to the EU's green transition to a circular and clean economy;</del></p> <p>HR  <b>(Comments):</b>                      HR supports the suggestions of CZ i BG in deleting the last sentence containing the reference to environmental claims, since that issue has already been addressed by the Commission through the existing legislative framework..</p> <p>IT  <b>(Drafting suggestions):</b></p>

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	<p>9. ENCOURAGES the Commission to <u>continue its work to enable consumers to play a more active role</u> <del>include consumers in the shift</del> towards a circular economy, by promoting safe, sustainable, affordable and trusted circular offers, including second-hand, repaired, refurbished and remanufactured goods and product-as-a-service models, <del>by addressing social and behavioral and product safety barriers to their uptake,</del> <b>by addressing emerging business models that encourage overconsumption, (ADD IT PROPOSAL) [and raise concerns regarding sustainability, product safety and consumer information,]</b> by fostering ‘green by design’ e-commerce solutions and by enabling easy access to <u>relevant</u> product information through Digital Product Passports <b>and other durable mediums; RECALLS that consumers need accurate, reliable, comparable, and verifiable environmental claims to make informed decisions, where the substantiation and verification of environmental claims and labels contributes to the EU's green transition to a circular and clean economy;</b></p> <p>IT  <b>(Comments):</b>                  We welcome the inclusion of the concept of paying attention to business models that encourage overconsumption, although it remains important from the Italian side to link this attention to consumer protection issues, as indicated in the original proposal, namely concerns regarding product safety (a topic strongly present in the document under consideration) but also “sustainability” and “consumer information” (concepts that are instead overlooked or not sufficiently highlighted). We therefore resubmit the original proposal of an added text.</p> <p>LU  <b>(Drafting suggestions):</b>                  9. ENCOURAGES the Commission to continue its work to enable consumers to play a more active role in the shift towards a circular economy, by promoting safe, sustainable, affordable and trusted circular offers, including second-hand, repaired, refurbished and remanufactured goods and</p>

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	<p>product-as-a-service models, by addressing social and behavioural barriers to their uptake, by addressing <u>emerging business models that encourage overconsumption</u>, by fostering ‘green by design’ e-commerce solutions and by enabling easy access to relevant product information through Digital Product Passports and other durable mediums; RECALLS that consumers need accurate, reliable, comparable, and verifiable environmental claims to make informed decisions, where the substantiation and verification of environmental claims and labels contributes to the EU's green transition to a circular and clean economy;</p> <p>LU  <b>(Comments):</b>                      LU: We propose deleting the term “<i>emerging</i>” because overconsumption is not an issue limited to emerging business models; several established business models already incentivize or encourage overconsumption.</p> <p>NL  <b>(Drafting suggestions):</b>                      ENCOURAGES the Commission to <b><u>continue its work to enable consumers to play a more active role</u></b> <del>include consumers</del> in the shift towards a circular economy, by promoting safe, sustainable, affordable and trusted circular offers, <del>including second-hand, repaired, refurbished and remanufactured goods and product-as-a-service models, by addressing social and, behavioural and product-safety barriers to their uptake, by addressing emerging business models that encourage overconsumption,</del> by fostering ‘green by design’ e-commerce solutions and by enabling easy access to <b><u>relevant</u></b> product information through Digital Product Passports <del>and other durable mediums</del>; <b><u>RECALLS that consumers need accurate, reliable, comparable, and verifiable environmental claims to make informed decisions, where the substantiation and verification of environmental claims and labels which</u></b> contributes to the EU's green transition to a circular and clean economy;</p> <p>NL  <b>(Comments):</b></p>

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	<p>We think the current text puts too much emphasis on refurbished/second hand products, while it is also (or even more) important to focus on sustainability of value chains of new products.</p> <p>SE</p> <p><b>(Drafting suggestions):</b></p> <p>ENCOURAGES the Commission to <b><u>continue its work to enable consumers to play a more active role</u></b> <del>include consumers</del> in the shift towards a circular economy, by promoting safe, sustainable, affordable and trusted circular offers, including second-hand, repaired, refurbished and remanufactured goods and product-as-a-service models, <del>by addressing social</del> <b><u>and</u></b> behavioural <del>and product safety</del> barriers to their uptake, <b><u>by addressing emerging business models that encourage overconsumption</u></b>, by fostering ‘green by design’ e-commerce solutions and by enabling easy access to <b><u>relevant</u></b> product information through Digital Product Passports <b><u>and other durable mediums</u></b>; <b><u>RECALLS that consumers need accurate, reliable, comparable, and verifiable environmental claims to make informed decisions, where the substantiation and verification of environmental claims and labels contributes to the EU's green transition to a circular and clean economy</u></b>;</p> <p>SE</p> <p><b>(Comments):</b></p> <p>In order to promote clarity of the text, SE would prefer that the red marked text was removed. If it is particularly important for other MS to include "labels", this could then instead be inserted in the first part of the sentence, i.e. “RECALLS that consumers need accurate, reliable, comparable, and verifiable environmental claims <b><u>and labels</u></b> to make informed decisions;”</p> <p>SK</p> <p><b>(Drafting suggestions):</b></p> <p>ENCOURAGES the Commission to <b><u>continue its work to enable consumers to play a more active role</u></b> <del>include consumers</del> in the shift towards a circular economy, <b><u>by promoting sustainable consumption models and the circular economy that are accessible, affordable, and safe for consumers</u></b></p>

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	<p>SK  <b>(Comments):</b>                      Listing specific stages of product processing is too technical for Council Conclusions. The Council should declare support for the circular economy as a concept.</p>
<p>10. AGREES with the aim <b><u>and EMPHASISES the importance</u></b> of strengthening consistent and effective implementation, application and enforcement of EU consumer and product safety rules, <b><u>CALLS for</u></b> <del>in</del> close cooperation among EU institutions and Member States’ administrative and judicial authorities <b><u>including through the strengthening and interoperability of market surveillance platforms and the active involvement of consumer organisations and all relevant market actors across the value chain;</u></b> and <b><u>ENCOURAGES Member States to actively use the Safety Gate portal under the General Product Safety Regulation to report unsafe products;</u></b></p>	<p>CZ  <b>(Drafting suggestions):</b>                      AGREES with the aim <b><u>and EMPHASISES the importance</u></b> of strengthening consistent and effective implementation, application and enforcement of EU consumer and product safety rules, <b><u>CALLS for</u></b> <del>in</del> close cooperation among EU institutions and Member States’ administrative and judicial authorities <b><u>including through the strengthening and interoperability of EU market surveillance platforms and the active involvement of consumer organisations and all relevant market actors across the value chain;</u></b> and <b><u>ENCOURAGES Member States to actively use the Safety Gate portal under the General Product Safety Regulation to report unsafe products;</u></b></p> <p>CZ  <b>(Comments):</b>                      We propose clarification that EU market surveillance systems are meant.</p> <p>FI  <b>(Drafting suggestions):</b>                      - - and <b><u>ENCOURAGES Member States to actively use the Safety Gate <del>portal</del> <b>[or the Safety Gate Rapid Alert System]</b> portal under the General Product Safety Regulation to report unsafe products;</u></b></p> <p>FI  <b>(Comments):</b>                      GPSR, preamble 68: Safety Gate comprises three elements: first, a rapid alert system on dangerous non-food products whereby national authorities and the Commission can exchange information on such products (Safety Gate Rapid Alert System); second, a web portal to inform the public and enable them to</p>

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	<p>submit complaints (Safety Gate Portal); and third, a web portal to enable businesses to comply with their obligation to inform authorities and consumers of dangerous products and accidents (Safety Business Gateway).</p> <p>HU  <b>(Comments):</b>                      We kindly ask to specify the term “market surveillance platforms”.</p> <p>IT  <b>(Comments):</b>                      We welcome the inclusion of the point where asked for:  <u><b>including through the strengthening and interoperability of market surveillance platforms</b></u></p> <p>We welcome the inclusion of the Italian proposal within the concluding paragraphs, where we had envisaged it, namely in the recitals.:  <u><b>ENCOURAGES Member States to actively use the Safety Gate portal under the General Product Safety Regulation to report unsafe products;</b></u></p> <p>NL  <b>(Drafting suggestions):</b>                      AGREES with the aim <u><b>and EMPHASISES the importance</b></u> of strengthening consistent and effective implementation, application and enforcement of EU consumer and product safety rules, <u><b>CALLS for</b></u> a close cooperation among EU institutions and Member States’ administrative and judicial authorities <u><b>including through the strengthening and interoperability of market surveillance platforms and the active involvement of consumer organisations and all relevant market actors across the value chain;</b></u> and <u><b>ENCOURAGES Member States to actively use the Safety Gate portal under the General Product Safety Regulation to report unsafe products;</b></u></p> <p>NL  <b>(Comments):</b>                      Too detailed.                      Also, consumers organizations in the Dutch system are not directly involved in public enforcement since public enforcement is independent. Although we</p>

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	<p>value the existing cooperation between these institutions, the current text seems to indicate direct involvement of consumer organisations.                      SK                      (Drafting suggestions):                      AGREES with the aim <u>and EMPHASISES the importance</u> of strengthening consistent and effective implementation, application and enforcement of EU consumer and product safety rules, <u>CALLS for</u> <del>in</del> close cooperation among EU institutions and Member States' administrative and judicial authorities <u>including through the strengthening and interoperability of market surveillance platforms tools and the active involvement of consumer organisations and all relevant market actors across the value chain;</u> <del>and ENCOURAGES Member States to actively use the Safety Gate portal under the General Product Safety Regulation to report unsafe products;</del>                      SK                      (Comments):                      We propose deleting the last part. Reporting corrective measures via the Safety Gate Rapid Alert System (part of the Safety Gate Portal) is mandatory for Member States under the GPSR and the Market Surveillance Regulation.</p>
<p>11. <u>UNDERLINES the potential of AI in consumer protection and product safety enforcement and market surveillance activities, and the need for authorities to be able to deploy AI to its full potential and build stronger enforcement capacities; CALLS on the Commission to further develop tools such as the digital investigations eLab and the digital toolbox for product safety market surveillance;</u></p>	<p>EL                      (Drafting suggestions):  <u>CALLS on the Commission to further develop tools such as the digital investigations eLab and the digital toolbox for product safety market surveillance; including tools aimed at enhancing online controls and safeguarding minors in the digital environment</u>                      EL                      (Comments):                      It is proposed to add, in the second paragraph of this point, a reference to digital control tools for the protection of minors online.                      HU                      (Drafting suggestions):</p>

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	<p>11. <u>UNDERLINES the potential of AI in consumer protection and product safety enforcement and market surveillance activities, and the need for authorities to be able to deploy AI to its full potential and build stronger enforcement capacities; CALLS on the Commission to further develop and operate digital tools supporting consumer protection and product safety inspections/enforcement such as the digital investigations eLab and the digital toolbox for product safety market surveillance;</u></p> <p>HU                      (Comments):                      "... and market surveillance activities": since consumer product safety enforcement is carried out by market surveillance activities, this is an unnecessary duplication.</p> <p>SK                      (Drafting suggestions):  <u>UNDERLINES the potential of AI in consumer protection and product safety enforcement and market surveillance activities, and the need for authorities to be able to deploy AI to its full potential and build stronger enforcement capacities; ENCOURAGES the strengthening of digital capacities and the development of modern investigation tools for market surveillance authorities,</u></p> <p>SK                      (Comments):                      References to specific IT projects or portals, such as eLab or Safety Gate, are not well suited to a strategic document of this nature.</p>
<p>12. <u>RECOGNISES the need CALLS on the Commission to propose the revision of the Consumer Protection Cooperation Regulation, to strengthen enforcement of consumer law and ensure a level playing field for businesses, including through improved coordination among national authorities while ACKNOWLEDGING the different enforcement systems in the Member States; URGES the Commission to take action to strengthen enforcement especially in</u></p>	<p>CZ                      (Drafting suggestions):  <u>RECOGNISES the need CALLS on the Commission to propose the revision of the Consumer Protection Cooperation Regulation, to strengthen enforcement of consumer law and ensure a level playing field for businesses, including through improved coordination among national authorities while ACKNOWLEDGING the different enforcement systems in the Member</u></p>

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<p><u>relation to widespread infringements</u> assess the need for centralized investigation and enforcement powers at EU level in specific cases <b>and WELCOMES the Commission’s intention to revise the Consumer Protection Cooperation Regulation and to assess the need for centralized investigation and enforcement powers at EU level in specific cases;</b></p>	<p><b>States; URGES the Commission to <u>take action to strengthen enforcement especially in relation to widespread infringements</u> assess the need for centralized investigation and enforcement powers at EU level in specific cases <u>and WELCOMES the Commission’s intention to <b>evaluate current regulatory instruments and where appropriate, to revise the Consumer Protection Cooperation Regulation, with particular regard to real enforceability of EU law</b> and to assess the need for centralized investigation and enforcement powers at EU level in specific cases;</u></b></p> <p>CZ  <b>(Comments):</b>                  Despite the Presidency explanation and assurance in Flash, we disagree with this addition. As mentioned already, CZ is of the opinion that the Council’s conclusions should be rather of a general nature. For the sake of compromise, we suggest an addition to the text.</p> <p>ES  <b>(Drafting suggestions):</b>  <b>RECOGNISES</b> the need to strengthen the enforcement of consumer law and ensure a level playing field for businesses, including through improved coordination among national authorities, while <b>ACKNOWLEDGING</b> the different enforcement systems in the Member States; <b>CALLS ON</b> the Commission to take action to strengthen enforcement in relation to practices <b>with a significant impact on the functioning of the internal market;</b> and <b>WELCOMES</b> the Commission’s intention to revise the Consumer Protection Cooperation Regulation and to assess the need for centralised investigation and enforcement powers <b>at EU level, where such action would provide added value and enhance the efficiency and effectiveness of enforcement.</b></p> <p>FR  <b>(Drafting suggestions):</b>  <b>RECOGNISES</b> the need <b>CALLS on the Commission to propose the revision of the Consumer Protection Cooperation Regulation,</b> to strengthen enforcement of consumer law and ensure a level playing field for</p>

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	<p>businesses, including through improved coordination among national authorities while ACKNOWLEDGING the different enforcement systems in the Member States; URGES the Commission to <b>assess the need for centralized investigation</b>, <del>take action to strengthen enforcement especially in relation to widespread infringements and</del> <b>enforcement and sanction powers</b> especially in relation to widespread infringements and <del>WELCOMES the Commission’s intention to revise the Consumer Protection Cooperation Regulation and to assess the need for centralized investigation and enforcement powers at EU level in specific cases;</del></p> <p>FR  <b>(Comments):</b>                      The French authorities support an ambitious revision of the consumer protection cooperation regulation so that the Commission would be granted powers of investigation and sanction to address widespread infringements at the EU level.</p> <p>HR  <b>(Comments):</b>                      As IT, HR also welcomes the addition regarding the need for revising the CPC Regulation, in order to strengthen the enforcement activities on EU level. HR also supports the suggestions of FR and PT in providing more ambitious CPC revision; however, HR does not consider it essential to include additional wording in the current text.</p> <p>HU  <b>(Drafting suggestions):</b>                      12. <b>RECOGNISES the need</b> <del>CALLS on the Commission to propose the revision of the Consumer Protection Cooperation Regulation, to strengthen enforcement of consumer law and ensure a level playing field for businesses, including</del> <b>through</b> improved coordination among national authorities, <b>as well as the Commission, while ACKNOWLEDGING the different enforcement systems in the Member States;</b> URGES the Commission to <b>take action to strengthen enforcement especially in relation to widespread infringements</b> assess the need for centralized investigation and</p>

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	<p>enforcement powers at EU level in specific cases <u>and WELCOMES the Commission’s intention to revise the Consumer Protection Cooperation Regulation and INVITES the Commission to present clear, transparent and robust data enabling the assessment of the <del>to assess</del> the need for centralized investigation and enforcement powers at EU level in specific cases;</u></p> <p>IT  <b>(Comments):</b>                      We do not raise any objections because the text states that it acknowledges the Commission intention (that is “will consider”) to centralize investigative and enforcement powers; however, it appears to us that the amendment provides more incisive guidance as to the direction that the revision of the CPC will have to take.  <u>WELCOMES the Commission’s intention to revise the Consumer Protection Cooperation Regulation and to assess the need for centralized investigation and enforcement powers at EU level in specific cases;</u></p> <p>LU  <b>(Drafting suggestions):</b>  <del>And WELCOMES the Commission’s intention to revise the Consumer Protection Cooperation Regulation and to propose assess the need for centralized investigation and enforcement powers at EU level in specific cases;</del></p> <p>LU  <b>(Comments):</b>                      LU would prefer a more ambitious wording on the CPC Revision. The proposal was initially foreseen to be adopted by the Commission within the enforcement package and has already been postponed several times. In a spirit of compromise, we could accept maintain only the level of ambition of the initial draft of the conclusions where the Council “urged” the Commission to assess the need for centralised investigation and enforcement powers at EU level in specific cases.</p> <p>NL</p>

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	<p><b>(Drafting suggestions):</b>  <u>RECOGNISES the need</u> CALLS on the Commission to propose the revision of the Consumer Protection Cooperation Regulation, to strengthen enforcement of consumer law and ensure a level playing field for businesses, including <u>through</u> improved coordination among national authorities <u>while</u> <b>ACKNOWLEDGING the different enforcement systems in the Member States</b>; URGES the Commission to <b>take action to strengthen enforcement especially in relation to widespread infringements</b> assess the need for centralized investigation and enforcement powers at EU level in specific cases <b>and WELCOMES the Commission’s intention scheduled revision of the Consumer Protection Cooperation Regulation, including and to assess the need for centralized investigation and enforcement powers at EU level in specific cases, where appropriate and necessary;</b></p> <p>NL  <b>(Comments):</b>                  We think the wording ‘assess the need for’ is too weak. There seems broad support in the Council for centralized enforcement of consumer law in specific cases (as shown for example during the informal ministerial meeting in Belgium).</p> <p>PL  <b>(Drafting suggestions):</b>  <i>“WELCOMES the Commission’s intention to revise the Consumer Protection Cooperation Regulation and to assess different options how to improve the effectiveness of enforcement.”</i></p> <p>PL  <b>(Comments):</b>                  Taking into account the CLS explanations on the non-binding nature of the Conclusions, while noting that they nevertheless express a certain political position - PL is not opposed to the revision of the CPC, rather, we are cautious about formulating general support in the Conclusions for future Commission initiatives (of any kind) whose content we do not yet know. We prefer to wait for a draft and only then take a position. We are keen on the effective use of</p>

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	<p>existing legal instruments and on ensuring that new initiatives are preceded by a proper impact assessment, so as to avoid duplicating solutions.</p> <p>That’s why we would suggest the following amendment to the last sentence: <i>“WELCOMES the Commission’s intention to revise the Consumer Protection Cooperation Regulation and to assess different options how to improve the effectiveness of enforcement.”</i></p> <p>SE</p> <p><b>(Drafting suggestions):</b></p> <p><b><u>RECOGNISES the need</u></b> <del>CALLS on the Commission to propose the revision of the Consumer Protection Cooperation Regulation,</del> to strengthen enforcement of consumer law and ensure a level playing field for businesses, including <b><u>through</u></b> improved coordination among national authorities <b><u>while ACKNOWLEDGING the different enforcement systems in the Member States;</u></b> <del>STRESSING the need</del> <b><u>URGES the Commission to take action to strengthen enforcement especially in relation to widespread infringements</u></b> <del>assess the need for centralized investigation and enforcement powers at EU level in specific cases</del> <b><u>and WELCOMES the Commission’s intention to revise the Consumer Protection Cooperation Regulation and to assess the need for centralized investigation and enforcement powers at EU level in specific cases;</u></b></p> <p>SE</p> <p><b>(Comments):</b></p> <p>Emphasis should be on the evaluation and depending on the outcome of this, it may become relevant to take action to strengthen enforcement, which is welcomed in the third sentence. Consequently, SE proposes some amendments to the text in order not to get ahead of events, i.e. the evaluation. Also, strengthened enforcement is a matter that lies within the mandate of the Member States through supervision carried out by national supervisory authorities in accordance with the current legal framework. This can be done regardless of future legislative proposals from the Commission.</p> <p>SI</p> <p><b>(Drafting suggestions):</b></p>

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	<p><b><u>RECOGNISES the need</u></b> <del>CALLS on the Commission to propose the revision of the Consumer Protection Cooperation Regulation, to strengthen enforcement of consumer law and ensure a level playing field for businesses, including <b>through</b> improved coordination among national authorities <b>while</b></del> <b><u>ACKNOWLEDGING the different enforcement systems in the Member States</u></b>; <del>URGES the Commission to <b>take action to strengthen enforcement especially in relation to widespread infringements</b> assess the need for centralized investigation and enforcement powers at EU level in specific cases</del> <b><u>and WELCOMES the Commission’s <del>intention</del> scheduled revision of the Consumer Protection Cooperation Regulation, including <del>and to assess the need for</del> centralized investigation and enforcement powers at EU level in specific cases, where appropriate and necessary</u></b>;</p> <p>SI  <b>(Comments):</b>                      SI supports the amendment to point 12, the Commission's intention to revise the Consumer Protection Cooperation Regulation and to assess the need for centralized investigation and enforcement powers at EU level in specific cases, as we have repeatedly pointed out.                      In order to further improve point 12, SI joins NL’s proposal that the wording ‘assess the need for’ is too weak and that we should replace it with suggested text.</p>
<p>13. CALLS on the Commission to expand cooperation with third countries in bilateral or multilateral contacts, <b><u>strengthening joint work on a wide range of emerging consumer protection issues</u></b> including with a view to ensuring the placing of only safe products on the single market and securing access for consumers to safe products sold online and offline <b><u>with particular attention to the growing volume of low-value consignments originating from third countries and sold through online platforms, which pose specific challenges for product safety, customs controls and fair competition</u></b>;</p>	<p>ES  <b>(Drafting suggestions):</b>  <b><u>HIGHLIGHTS the importance of joint work on a wide range of emerging consumer protection issues in order to ensure compliance and safeguard consumers in the internal market.</u></b>  <b><u>CALLS on the Commission to address the challenges arising from the growing volume of low-value consignments sold through online platforms, in particular in the absence of a responsible economic operator within the Union, which raise concerns for customs controls, product safety and fair competition, through a comprehensive approach</u></b></p>

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	<p><b><u>that includes ensuring that the relevant EU legislation remains fit for purpose, strengthening effective enforcement within the Union, and expanding cooperation with third countries in bilateral and multilateral contexts.</u></b></p> <p>HR  <b>(Comments):</b>                      HR supports the addition to the text, especially in introducing special emphasis on low-value consignments originating from third countries and sold through online platforms, as one of the more prominent issues which require additional activities.</p> <p>HU  <b>(Drafting suggestions):</b>                      13. CALLS on the Commission to expand cooperation with third countries in bilateral or multilateral contacts, <b><u>strengthening joint work on a wide range of emerging consumer protection issues</u></b> including with a view to ensuring the placing of only safe products on the single market and securing access for consumers to safe products sold online and offline <b><u>with particular attention to the growing volume of low-value consignments originating from third countries and sold through online platforms, which pose specific challenges for <del>product safety</del> market surveillance of consumer products, customs controls and fair competition;</u></b></p> <p>HU  <b>(Comments):</b>                      We highly support the part “(...) with particular attention to the growing volume of low-value consignments originating from third countries and sold through online platforms, which pose specific challenges”</p> <p>IT  <b>(Comments):</b>                      We welcome the inclusion of the point asked for by the Italian Delegation. <b><u>with particular attention to the growing volume of low-value consignments originating from third countries and sold through online</u></b></p>

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	<p><u>platforms, which pose specific challenges for product safety, customs controls and fair competition;</u>                      NL                      (Drafting suggestions):                      CALLS on the Commission to expand cooperation with third countries in bilateral or multilateral contacts, <u>strengthening joint work on a wide range of emerging consumer protection issues</u> including <del>with a view to</del> ensuring the placing of only safe products on the <del>s</del>Single <del>m</del>Market and securing access for consumers to safe products sold online and offline, <u>with particular attention to the growing volume of low-value consignments originating from third countries and sold through online platforms, which pose specific challenges for product safety, customs controls and fair competition;</u>                      NL                      (Comments):                      We suggest to change the order and put point 13 after point 10.                      We also see a large influx of direct imports via dropshipping, so this flow of products is not solely through online platforms.</p>
<p>14. CALLS on the Commission to ensure that, in the preparation of new initiatives, <del>a high level of consumer protection is maintained</del> <u>the horizontal nature of consumer law is preserved</u>, coherence with existing legislative acts is ensured by avoiding overlaps, <u>the need for legislative proposals is assessed carefully and</u> proposals are underpinned by appropriate impact assessments in accordance with the principles of better regulation, <u>including assessment of enforceability</u> <del>and that they are aligned with the Union's overarching objective of simplification and the reduction of unnecessary administrative burdens,</del> <u>while maintaining and promoting a high level of consumer protection;</u></p>	<p>FR                      (Drafting suggestions):                      CALLS on the Commission to ensure that, in the preparation of new initiatives, <del>the horizontal nature of consumer law is preserved</del>, coherence with existing legislative acts is ensured by avoiding overlaps, the need for legislative proposals is assessed carefully and proposals are underpinned by appropriate impact assessments in accordance with the principles of better regulation, including assessment of enforceability, while maintaining and promoting a high level of consumer protection;                      FR                      (Comments):                      The horizontal nature of consumer law is already mentioned in paragraph 8.</p>

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	<p>HR                      (Comments):                      Since the additions provided in the text go in line with the previous comments of HR, pointing out the need of avoiding overlaps in EU legislation, HR supports the addition in the text.</p> <p>HU                      (Drafting suggestions):                      14. CALLS on the Commission to ensure that, in the preparation of new initiatives, a high level of consumer protection is maintained <b><u>the horizontal nature of consumer law is preserved</u></b>, coherence with existing legislative acts is ensured by avoiding overlaps, <b><u>the need for legislative proposals is assessed carefully and</u></b> proposals are underpinned by appropriate impact assessments in accordance with the principles of better regulation, <b><u>including the presentation of clear, transparent and robust data and assessment of enforceability</u></b> and that they are aligned with the Union’s overarching objective of simplification and the reduction of unnecessary administrative burdens, <b><u>while maintaining and promoting a high level of consumer protection</u></b>;</p> <p>LU                      (Drafting suggestions):                      CALLS on the Commission to ensure that, in the preparation of new initiatives, a high level of consumer protection is maintained the horizontal nature of consumer law is preserved, coherence with existing legislative acts is ensured by avoiding overlaps, the need for legislative proposals is assessed carefully and proposals are underpinned by appropriate impact assessments in accordance with the principles of better regulation, including assessment of enforceability and that they are aligned with the Union’s overarching objective of simplification and the reduction of unnecessary administrative burdens, while maintaining and promoting a high level of consumer protection;</p> <p>LU                      (Comments):</p>

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	LU : We propose to move and merge this part in point 8, in order to avoid repetition.
<p>15. <u><b>CALLS on the Commission to ensure that new initiatives are aligned with the Union’s overarching objective of simplification and do not result in unnecessary administrative burden, while ensuring that digital solutions aiming to achieve this purpose do not result in the exclusion of consumers and that appropriate non-digital alternatives remain available, when necessary;</b></u></p>	<p>DK  <b>(Drafting suggestions):</b>  <u><b>CALLS on the Commission to ensure that new initiatives are aligned with the Union’s overarching objective of simplification and do not result in unnecessary administrative burden, while <b>stressing that such initiatives must lead to well-documented improvements for consumers that outweigh the costs, and</b> ensuring that digital solutions aiming to achieve this purpose do not result in the exclusion of consumers and that appropriate non-digital alternatives remain available, when necessary;</b></u></p> <p>HR  <b>(Comments):</b>                  Since the additions provided in the text go in line with the previous comments of HR requesting that the availability of non-digital solutions should be included in the text, HR strongly supports the new Paragraph.</p> <p>HU  <b>(Comments):</b>                  Fully supported.</p> <p>IT  <b>(Drafting suggestions):</b>  <u><b>15. CALLS on the Commission to ensure that new initiatives are aligned with the Union’s overarching objective of simplification and do not result in unnecessary administrative burden,</b></u>                  (IT PROPOSAL) while considering the specific needs and capacities of SMEs, in particular in the e-commerce sector, <u><b>while and ensuring that digital solutions aiming to achieve this purpose do not result in the exclusion of consumers and that appropriate non-digital alternatives remain available, when necessary,</b></u> especially for vulnerable consumers.”</p> <p>IT  <b>(Comments):</b></p>

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	<p>We welcome the fact that an additional paragraph has been added, although, compared to the Italian proposal, which is resubmitted below, the focus has shifted from the specific protection of SMEs and vulnerable consumers to a more general objective of simplification and reduction of administrative burdens, maintaining only in a generic way (where necessary) the need for non-digital alternatives for consumers, without mentioning specific sectors of attention (Italy had highlighted e-commerce). We therefore resubmit a proposed amendment:</p> <p>LU</p> <p><b>(Drafting suggestions):</b>  <b>CALLS on the Commission to ensure that new initiatives are aligned with the <u>Commission’s</u> Union’s overarching objective of simplification and do not result in unnecessary administrative burden, while ensuring that digital solutions aiming to achieve this purpose do not result in the exclusion of consumers and that appropriate non-digital alternatives remain available, when necessary;</b></p> <p>NL</p> <p><b>(Drafting suggestions):</b>  <b><u>CALLS on the Commission to ensure that <b>current and new initiatives</b> are aligned with the Union’s overarching objective of simplification and do not result in unnecessary administrative burden, while ensuring that digital solutions aiming to achieve this purpose do not result in the exclusion of consumers <b>or businesses</b> and that appropriate non-digital alternatives remain available, when necessary;</u></b></p> <p>PL</p> <p><b>(Comments):</b>  <b>PL does not object to the proposal, but we would welcome consideration of supplementing this point of the Conclusions with a passage explicitly stating that the simplifications being introduced must not lower the level of consumer protection.</b>  Suggested amendment:</p>

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	<p>“CALLS on the Commission to ensure that new initiatives are aligned with the Union’s overarching objective of simplification and do not result in unnecessary administrative burden, while <b>ensuring that simplification should not result in a lowering of the level of consumer protection and ensuring that digital solutions aiming to achieve this purpose do not result in the exclusion of consumers and that appropriate non-digital alternatives remain available, when necessary;</b>”</p>
<p>16. UNDERLINES the importance of easy, <b>affordable</b> and effective access to redress for consumers in case of dispute <b><u>through a modernised out-of-court dispute resolution for consumers fit for the digital markets as provided for by the revised Alternative Dispute Resolution Directive and through mechanisms for collective actions for redress as foreseen in the Representative Actions Directive</u></b>, in particular through a modernised out-of-court dispute resolution for consumers fit for the digital markets;</p>	<p>HR  <b>(Drafting suggestions):</b>            UNDERLINES the importance of easy, <b>affordable</b> and effective access to redress for consumers in case of dispute <b><u>through a modernised out-of-court dispute resolution for consumers which is also fit for the digital markets as provided for by the revised Alternative Dispute Resolution Directive and through mechanisms for collective actions for redress as foreseen in the Representative Actions Directive</u></b>, in particular through a modernised out-of-court dispute resolution for consumers fit for the digital markets;</p> <p>HR  <b>(Comments):</b>            HR considers necessary to point out that the out of court redress mechanisms are not only fit for digital markets, but also for consumer disputes concluded offline.</p>
<p>17. <del>RECOGNISES the potential of AI in consumer protection and product safety enforcement and market surveillance activities, and the need for authorities to be sufficiently resourced to be able to deploy AI to its full potential and build stronger enforcement capacities;</del>  <del>CALLS on the Commission to further develop tools such as the digital investigations eLab and the digital toolbox for product safety market surveillance;</del></p>	<p>PL  <b>(Comments):</b>            In principle, PL does not object to the proposed wording of point 17. However, PL points out that the decision on whether to provide support, as well as on the form of such support to consumer organisations, lies with the respective Member State.</p>

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<p>UNDERLINES the active role of consumer organisations and the European Consumer Centres Network <b><u>as important actors in collective enforcement and awareness raising</u></b> in defending the interests of consumers, and providing information, education and support to consumers; <b><u>HIGHLIGHTS the importance of consumer education, including financial literacy and raising awareness in purchasing choices, as a key tool to empower consumers, enhance inclusion and resilience, and support informed decision-making, particularly in digital and financial markets;</u></b></p> <p>WELCOMES the intention of the Commission to <b><u>further</u></b> support the consumer movement as integral part of democratic societies, and URGES Member States to ensure <del>necessary</del> support for consumer organisations and other such bodies, <b><u>where necessary,</u></b> <del>to carry out their tasks</del> at national level;</p>	<p>EL (Comments): It is recommended that this point be moved after section 6, as it refers to consumer education and awareness issues.</p> <p>FI (Drafting suggestions): UNDERLINES the active role of consumer organisations and the European Consumer Centres Network <b><u>as important actors in collective enforcement and awareness raising</u></b> in defending the interests of consumers, and providing information, education and support to consumers</p> <p>FI (Comments): The drafting seems imbiguous. As a starting point in Finland the collective enforcement/consumer protection falls within the competence of the Consumer Ombudsman – not within the European Consumer Centre.</p> <p>HR (Drafting suggestions): UNDERLINES the active role of consumer organisations and the European Consumer Centres Network <b><u>as important actors in collective enforcement and awareness raising</u></b> in defending the interests of consumers, and providing information, education and support to consumers; <b><u>HIGHLIGHTS the importance of consumer education, including financial literacy and raising awareness in purchasing choices, as a key tool to empower consumers, enhance inclusion and resilience, and support informed decision-making, particularly in digital and financial markets;</u></b></p> <p>WELCOMES the intention of the Commission to <b><u>further</u></b> support the consumer movement as integral part of democratic societies, and URGES Member States to ensure <del>necessary</del> support for consumer organisations and other such bodies, <b><u>where necessary,</u></b> <del>to carry out their tasks</del> at national level;</p> <p>HR (Comments):</p>

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	<p>HR welcomes the addition regarding the importance of European Consumer Centres Network, since the text goes in line with the previous comments that HR previously supported.</p> <p>With regards to consumer education, HR considers it particularly important, however, HR is of the opinion that consumer education should be moved to a separate paragraph.</p> <p>IT  <b>(Comments):</b>                      The inclusion of the Italian proposal is welcomed  <u><b>HIGHLIGHTS the importance of consumer education, including financial literacy and raising awareness in purchasing choices, as a key tool to empower consumers, enhance inclusion and resilience, and support informed decision-making, particularly in digital and financial markets</b></u></p> <p>NL  <b>(Drafting suggestions):</b>                      UNDERLINES the active role of consumer organisations and the European Consumer Centres Network <u><b>as important actors in collective enforcement, and awareness raising, in</b></u> defending the interests of consumers, and providing information, education and support to consumers; <u><b>HIGHLIGHTS the importance of consumer education, including financial literacy and raising awareness in purchasing choices, as a key tool to empower consumers, enhance inclusion and resilience, and support informed decision-making, particularly in digital and financial markets;</b></u>                      WELCOMES the intention of the Commission to <b>further</b> support the consumer movement as integral part of democratic societies, and URGES Member States to ensure <del>necessary</del> support for consumer organisations and other such bodies, <u><b>where necessary,</b></u> <del>to carry out their tasks at national level;</del></p> <p>SE  <b>(Drafting suggestions):</b>                      UNDERLINES the active role of consumer organisations and the European Consumer Centres Network <u><b>as important actors in, where applicable,</b></u></p>

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	<p><b><u>collective enforcement and awareness raising</u></b> in defending the interests of consumers, and providing information, education and support to consumers; <b><u>HIGHLIGHTS the importance of consumer education, including financial literacy and raising awareness in purchasing choices, as a key tool to empower consumers, enhance inclusion and resilience, and support informed decision-making, particularly in digital and financial markets;</u></b> WELCOMES the intention of the Commission to <b><u>further</u></b> support the consumer movement as integral part of democratic societies, and URGES Member States to ensure <del>necessary</del> support for consumer organisations and other such bodies, <b><u>where necessary</u></b>, <del>to carry out their tasks at national level;</del> SE</p> <p><b>(Comments):</b> In SE, the important task of enforcement is carried out by government authorities. Consumer organisations on the other hand are independent and the government cannot give them assignments or order them to do certain things. They can initiate representative action but they have never done that. Neither consumer organisations nor the ECC can be said to be important actors in collective enforcement in SE, which is why SE proposes an adaptive addition. Consumer organisations and the ECC fulfill other important functions in SE, but the responsibility for enforcement rests with the authorities. SK</p> <p><b>(Drafting suggestions):</b> WELCOMES the intention of the Commission to <b><u>further</u></b> support the consumer movement as integral part of democratic societies, <b><u>STRESSES the importance of adequate involvement of civil society and independent entities in defending consumer interests,</u></b> SK</p> <p><b>(Comments):</b> The wording on “ensuring support” may merit further reflection, given that decisions on such matters lie primarily at national level.</p>

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<p>18. ENDORSES the cross-sectoral, holistic approach taken in the 2030 Consumer Agenda, <u>which is especially relevant to address e-commerce challenges</u> and UNDERLINES the importance of taking consumer interests <u>and empowerment</u> into account in all <u>relevant</u> policymaking <u>at the European and national level</u>;</p>	<p>EL (Comments): It is proposed to merge points 18 and 19, as they jointly address issues related to the Consumer Agenda 2030.</p> <p>HU (Drafting suggestions): 18. ENDORSES the cross-sectoral, holistic approach taken in the 2030 Consumer Agenda, <u>which is especially highly relevant to address e-commerce challenges</u> and UNDERLINES the importance of taking consumer interests <u>and empowerment</u> into account in all <u>relevant</u> policymaking <u>at the European and national level</u>;</p> <p>NL (Drafting suggestions): ENDORSES the cross-sectoral, holistic approach taken in the 2030 Consumer Agenda, <u>which is especially relevant to strengthening the Single Market, particularly addressing e-commerce challenges</u> and UNDERLINES the importance of taking consumer interests <u>and empowerment</u> into account in all <u>relevant</u> policymaking <u>at the European and national level</u>;</p> <p>NL (Comments): This cross-sectoral and holistic approach is also stressed in the Single Market Strategy of May 2025; therefore, good to address this first in relation to the Single Market generally, and then mention e-commerce specifically.</p> <p>SE (Drafting suggestions): ENDORSES the cross-sectoral, holistic approach taken in the 2030 Consumer Agenda, <u>which is especially relevant to address e-commerce challenges</u> and UNDERLINES the importance of taking consumer interests <u>and empowerment</u> into account in all <u>relevant</u> policymaking <u>at the European and national level</u>;</p> <p>SE</p>

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	<p><b>(Comments):</b> To stay within the given framework, SE advocates the removal of the addition “at the European and national level” or, alternatively, the removal of only “and national”.</p>
<p>19. WELCOMES the Commission’s intention to ensure an active governance framework for the implementation of the 2030 Consumer Agenda, by cooperating with Member States as well as civil society and all other stakeholders; EMPHASIZES the usefulness of such a governance framework to adapt and respond to emerging issues in an agile manner;</p>	<p>EL <b>(Comments):</b> It is proposed to merge points 18 and 19, as they jointly address issues related to the Consumer Agenda 2030.</p>
<p>20. <del>ACKNOWLEDGES the benefits of having comprehensive national consumer policies which work in synergy with the 2030 Consumer Agenda, while preserving the autonomy of national decisions, to contribute to a fully functioning single market; INVITES the Commission to support such synergies and create opportunities for collaboration on policy goals</del> <b><u>the importance of comprehensive national consumer policies that are fully embedded in and actively contribute to the EU Consumer Agenda 2030, forming part of a common and reinforced approach to consumer protection across the Union also preventing regulatory fragmentation; STRESSES that the effective functioning of the single market increasingly depends on the convergence of enforcement practices, the sharing of tools, data and expertise, and the collective ability to address cross-border and systemic challenges; INVITES the Commission to take a proactive role in supporting this approach by fostering structured and long-term cooperation, promoting the pooling of capacities and resources, and ensuring that consumer protection is given adequate priority and means across the Union, while respecting national competences.</u></b></p>	<p>HR <b>(Comments):</b> HR strongly support the additions, emphasizing the importance of comprehensive national policies that need to be in line with the EU Consumer Agenda. Namely, as previously explained, while drafting the Croatian National Consumer Protection Programme 2028, special attention was put on the alignment of the objectives set out in the Programme with the EU objectives. HU <b>(Drafting suggestions):</b> 20. <del>ACKNOWLEDGES the benefits of having comprehensive national consumer policies which work in synergy with the 2030 Consumer Agenda, while preserving the autonomy of national decisions, to contribute to a fully functioning single market; INVITES the Commission to support such synergies and create opportunities for collaboration on policy goals</del> <b><u>the importance of comprehensive national consumer policies that are fully embedded in and actively contribute to the align with the priorities and support the implementation of the EU Consumer Agenda 2030, forming part of a common and reinforced approach to consumer protection across the Union also preventing regulatory fragmentation while</u></b></p>

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	<p><b><u>recognising and respecting their sovereignty</u></b>; <b><u>STRESSES that the effective functioning of the single market increasingly depends on the convergence of enforcement practices, the sharing of tools, data and expertise, and the collective ability to address cross-border and systemic challenges</u></b>; <b><u>INVITES the Commission to take a proactive role in supporting this approach by fostering structured and long-term cooperation, promoting the pooling of capacities and resources, and ensuring that consumer protection is given adequate priority and means across the Union, while respecting national competences.</u></b></p> <p>LU  <b>(Drafting suggestions):</b>  <b><u>ACKNOWLEDGES the importance of comprehensive national consumer policies that are fully embedded in and actively contribute to the EU Consumer Agenda 2030, forming part of a common and reinforced approach to consumer protection and education across the Union also preventing regulatory fragmentation;</u></b></p> <p>NL  <b>(Drafting suggestions):</b>  <b><u>ACKNOWLEDGES the benefits of having comprehensive national consumer policies which work in synergy with the 2030 Consumer Agenda, while preserving the autonomy of national decisions, to contribute to a fully functioning single market; INVITES the Commission to support such synergies and create opportunities for collaboration on policy goals</u></b> <b><u>the importance of comprehensive national consumer policies that are fully embedded in and actively contribute to the EU Consumer Agenda 2030, forming part of a common and reinforced approach to consumer protection across the Union also preventing regulatory fragmentation;</u></b> <b><u>STRESSES that the effective well-functioning of the sSingle mMarket increasingly depends on the convergence of enforcement practices, the sharing of tools, data and expertise, and the collective ability to address cross-border and systemic challenges; INVITES the Commission to take a proactive role in supporting this approach by fostering structured and</u></b></p>

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	<p><u>long-term cooperation, promoting the pooling of capacities and resources, and ensuring that consumer protection is given adequate priority <del>and means</del> across the Union, while respecting national competences.</u></p> <p>NL                      (Comments):                      Commission could in a way ensure priority, but not “means” due to national competences.</p>