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#### COVER NOTE

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From: General Secretariat of the Council

To: Delegations

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Subject: Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions - 2030 Consumer Agenda and action plan for consumers in the single market 'A new impulse for consumer protection, competitiveness and sustainable growth'  
- Opinion of the European Economic and Social Committee (EESC)

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Delegations will find attached a copy of the above-mentioned opinion. Other language versions are available on the following website:

<https://dmsearch.eesc.europa.eu/search/opinion>

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# OPINION

European Economic and Social Committee

## 2030 Consumer Agenda

Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions 2030 Consumer Agenda and action plan for consumers in the single market ‘A new impulse for consumer protection, competitiveness and sustainable growth’

[COM(2025) 848 final]

INT/1107

Rapporteur: **Thierry LIBAERT**

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Advisor	Guénaëlle Gault (to the rapporteur)
Referral	European Commission, 22/12/2025
Legal basis	Article 304 of the Treaty on the Functioning of the European Union
Section responsible	Single Market, Production and Consumption
Adopted in section	15/4/2026
Adopted at plenary session	29/4/2026
Plenary session No	605
Outcome of vote (for/against/abstentions)	191/1/1

## 1. **Conclusions and recommendations**

- 1.1 The European Economic and Social Committee (EESC) welcomes the 2025-2030 Consumer Agenda. This agenda constitutes an excellent framework for consumer protection for the years to come, both in its form and in its content. The EESC recognises that the European Commission is taking more interest in this area.
- 1.2 The EESC hopes that the Commission will be able to propose a more comprehensive vision of consumers that goes beyond a purely rights-based approach. It would be a good idea to establish a consumer policy clarifying the role the European Union envisages for consumers and their capacity to act at different levels.
- 1.3 In order to carry out a more comprehensive evaluation of the Consumer Agenda, the EESC would welcome a structured, detailed and data-driven assessment of the previous agenda.
- 1.4 While the EESC supports simplification measures, it stresses that under no circumstances can they undermine consumer protection.
- 1.5 Consumer protection must take into account diverse situations, particularly with regard to commercial deserts and the vulnerabilities of certain consumer groups.
- 1.6 The EESC would like to see faster and more in-depth checks on the safety of imported products, in particular those sold through e-commerce platforms based outside the EU. It would like to see similar efforts in the fight against counterfeiting. It also advises paying greater attention to microjustice practices in order to settle disputes involving small sums.
- 1.7 The EESC stresses the importance of the upcoming revision of the Consumer Protection Cooperation (CPC) Regulation as regards strengthening the enforcement of consumer law and ensuring a level playing field that protects law-abiding traders and consumers from market players that do not comply with these rules.
- 1.8 The EESC supports digitalisation measures, but also warns of the risks of an increase in cyberattacks and of the dehumanisation of consumer-business relations. The EESC stresses that, for all complaints, consumers must always be able to contact a human as a last resort.
- 1.9 The EESC also warns of the risk of gold-plating of certain directives, as this contributes to market fragmentation, deprives consumers of access to certain cross-border services and discourages the provision of certain products and services.
- 1.10 The EESC calls on the Commission to take more interest in product circularity and durability. The 'sustainable consumption' section of this agenda shows a sharp reduction in objectives at a time when the stakes of the green transition have never been higher.
- 1.11 The EESC recommends establishing a strong consumer protection policy against commercial messages from influencers, particularly those addressed to children. These messages often do

not indicate the influencer's financial links to the product or service, and are often related to contested or dangerous practices (for example cryptocurrencies or cosmetic surgery).

1.12 The EESC would like the Commission to strengthen its consultation process by expanding it to cover all relevant consumer policies and by further expanding its Consumer Policy Advisory Group.

1.13 The EESC encourages the Member States to support consumer associations, including through the use of fines for unlawful practices, in order to strengthen their capacity to act, particularly by carrying out comparative tests.

## 2. **Background to the opinion**

2.1 On 19 November 2025, the European Commission adopted the 2025-2030 Consumer Agenda. This document establishes the strategic framework for consumer policy for the coming years. It supports the view that consumer spending accounts for the largest segment of EU economic activity and that, as the Letta report indicates, consumer protection benefits both consumers and businesses.

2.2 The Commission's efforts to strengthen consumer protection are structured around five key strands:

### 2.2.1 Creating an action plan for consumers in the single market

This plan aims to complement the Single Market Strategy by taking into consideration specific issues that affect consumers. The plan's proposals include:

- conducting an evaluation of the Geo-Blocking Regulation, aimed at improving cross-border access to goods and services;
- developing cross-border financial services and facilitating retail investments in capital markets;
- rolling out European Digital Identity Wallets as a safe and reliable tool.

### 2.2.2 Strengthening online consumer protection

The Commission wants to adapt the EU's legislation to the rapid developments in e-commerce. Three main actions are announced:

- a Digital Fairness Act to tackle unfair commercial practices, with particular regard to minors;
- strengthening protection against online fraud and ensuring better support for fraud victims;
- fostering fair and transparent use of artificial intelligence (AI) in consumer markets.

### 2.2.3 Keeping up the momentum towards sustainable consumption

The Commission notes the growing interest of consumers in the environmental impact of their purchases, while also pointing out the obstacles that consumers continue to face in this regard. It intends to:

- support Member States with the implementation of the directives aimed at fostering sustainable consumption;
- promote harmonised information on the legal guarantee and product durability;
- support the circular economy, and particularly the repair and second-hand markets.

### 2.2.4 Better enforcement of rights and redress

The Commission points out that effective consumer protection depends on effective systems of enforcement and sanctions. The proposed actions include:

- strengthening the enforcement of existing legislation;
- making greater use of artificial intelligence for market surveillance;
- ensuring that businesses in non-EU countries are better informed about EU requirements.

### 2.2.5 Establishing a governance framework

This framework aims to increase cooperation between stakeholders by means of:

- a ministerial forum on consumer protection;
- dialogue geared to stepping up the involvement of young people;
- regular discussion on developments in and the revision of existing rules.

## 3. **General comments**

3.1 The EESC congratulates the European Commission on the high standard of its 2030 Consumer Agenda.

3.2 The Committee acknowledges that the Commission is now taking a greater interest in consumer protection, as the numerous texts published in recent years demonstrate.

3.3 The EESC notes that the agenda, although thorough and detailed, is still very technical and sector-specific (transport, digital, finance), albeit with certain sectors receiving scant attention, such as agriculture and food. It lacks an overarching philosophy: what type of consumption policy does the EU want to promote? The Committee regrets that there is no clear framework: the document reduces ‘consumer policy’ to protection, and fails to consider consumers’ capacity to be actors in the economic, green and digital transitions; it gives too little consideration to the ‘consumption’ ecosystem (producers, distributors, consumers).

3.4 The EESC questions just how effective measures focusing on consumer information are. Behavioural science studies document a structural gap between declared intentions and actual

behaviours. Environmental communication, labels and digital product passports will not be enough to transform practices. The EESC recommends influencing the contexts in which decisions are made (default options, shelf layouts, the online shopping experience), rather than focusing solely on making people aware of their responsibilities.

- 3.5 The EESC warns of the risk of gold-plating of certain directives – a practice that contributes to market fragmentation, makes it impossible for consumers to access certain cross-border services and discourages the provision of goods and services.
- 3.6 The EESC questions whether the 2025-2030 Consumer Agenda is up to the task of dealing with excessive deregulation. It believes that the administrative simplification referred to many times in the document should factor in the constant need to protect consumers.
- 3.7 The EESC regrets that the agenda addresses current challenges without anticipating future transformations such as automated consumption, AI purchasing agents, robotisation of decision making and significant ageing of consumers. A 2035-2040 timeline is needed, possibly through a foresight programme integrated into the Joint Research Centre.
- 3.8 The EESC would ask that in future, the Commission take the initiative of carrying out a structured assessment that includes indicators of results from the previous period's agenda before deciding on a new one. The EESC recommends that the agenda and the indicators go beyond declarations of trust, and include the following elements: the rate of closed complaint cases, average product lifespan and repair/replacement rates. The Commission could make good use of the evaluation work carried out by our Committee<sup>1</sup>.

#### 4. **Specific comments**

##### 4.1 Completing the single market

- 4.1.1 The EESC supports the idea of a Digital Identity Wallet which will make cross-border travel and shopping easier and calls for extreme vigilance given the danger of data hacking and cyber-attacks in general.

To this same end, it is also important to ensure that different identification networks and national electronic identification schemes are compatible.

- 4.1.2 The EESC points out that discussions on prices are almost completely absent from the agenda, even though they are the main market signal for consumers. It recommends incorporating a policy on price transparency and on combating illusory pricing practices (false promotions, manipulated reference prices).

- 4.1.3 The EESC stresses the importance of establishing EU-wide safety and consumer protection standards and the need for consumers to be involved in standardisation efforts. This includes adequate funding for the European Association for the Co-ordination of Consumer

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<sup>1</sup> EESC evaluation report entitled [Final evaluation of the Consumer Programme \(2014-2020\)](#).

Representation in Standardisation (ANEC), and efforts to encourage Member States to support consumer involvement in standardisation.

#### 4.2 Online consumer protection

4.2.1 The EESC notes the contradiction between the Commission's desire to make it easier for consumers to pay in cash and the increasing scarcity of ATMs. Access to cash is essential for many vulnerable consumer groups today, and for all consumers in times of crisis.

4.2.2 Regarding information overload, the EESC notes that the agenda expands the obligation to supply information but does not address the key problem of cognitive overload for consumers. The EESC recommends a European strategy for market legibility, including systematic tests to determine actual comprehension and not only formal transparency requirements.

4.2.3 With regard to digital labelling, the EESC warns of the trend of replacing physical labels with digital tools (QR codes). Essential information cannot be provided by digital tools in place of labels on packaging, as this development excludes vulnerable consumers, people with disabilities, and older people, and makes accessing information more costly in terms of time and attention. The EESC recommends that digital labelling be designed as a complement to, and not a substitute for, information attached to products in physical form.

4.2.4 The EESC calls for greater transparency and for it to be made easier for consumers to object to tracking and profiling for advertising purposes.

#### 4.3 Promoting sustainable consumption

The Commission seems to be taking considerably less interest in this area. The Consumer Agenda does not include any specific reference to the role of marketing and advertising in constant incentives to consume, to information on the sustainability and reparability of products, to environmental labelling, to the future of the Green Claims Directive, or to the role of influencers, particularly those operating from countries outside the European Union. The topic of fair consumption (fair trade) should have been included. While the EESC welcomes the 2028 launch of a European platform for repair, it notes that this was already provided for in the 2024 Right to Repair Directive.

In addition, reuse should be supported more vigorously as is already being done in some countries, particularly as regards spare parts in the automotive sector.

4.3.1 On advertising, the EESC finds it regrettable that the role of advertising in shaping behaviours is not considered at all. While the agenda claims to empower consumers, it ignores the problem of the constant incentives to overconsumption. This point should be taken into account in the Digital Fairness Act, particularly with regard to the issue of manipulative digital interfaces, known as dark patterns. The EESC recommends that due consideration be given to the rules on advertising for products with a high environmental footprint, along the lines of existing restrictions, such as those relating to tobacco.

4.3.2 Regarding circular economy infrastructure, the EESC notes that circular economy practices (repair cafés, second-hand shops) currently rely on the involvement of individuals and associations, with no structural support. The EESC recommends that Member States develop public circularity infrastructure: integration of lending and repair services into municipal facilities (along the lines of public libraries), financial support for citizens' initiatives, or regional networks guaranteeing access to reuse and repair services for everyone.

The EESC reiterates its call for a large-scale campaign to be launched aimed at training people for the repair professions. The profession has completely changed, and can be a major source of employment, offering jobs that cannot be relocated.

4.3.3 The EESC calls for the swift implementation of the Ecodesign Regulation<sup>2</sup> and the establishment of the European platform for repair provided for in the Right to Repair Directive<sup>3</sup> of 13 June 2024.

#### 4.4 Making redress and sanctioning systems more effective

4.4.1 The EESC welcomes the announced improvement of the sanctions system, but was surprised by the terms used, such as 'cooperate' or 'strengthen'. The data available, particularly as regards the danger posed by imported products and especially those imported through e-commerce platforms<sup>4</sup>, show that there is a serious and immediate danger and that it is even increasing drastically (+52% since 2019). The EESC recommends bolstering and clarifying the penalty system in order to counter this issue. Stricter enforcement is essential. The same applies to the fight against counterfeiting, which the European Anti-Fraud Office and Europol must treat as a priority<sup>5</sup>.

4.4.2 What is missing is not only better rules on sanctions, but a system that allows centralised enforcement for certain types of cases (with EU relevance). The EESC supports the upcoming revision of the CPC Regulation and the establishment of centralised sanctioning and investigative powers. The EESC calls for additional mechanisms to be put forward for tackling non-EU operators that target EU consumers, given that EU consumers remain exposed when buying from non-EU countries and national authorities have limited powers to enforce the legislation against these operators.

4.4.3 The EESC would like to see further recourse to settling disputes out of court when consumers seek compensation for damage done to them by traders<sup>6</sup>. As regards microjustice, the EESC points out that the majority of consumer complaints concern small sums that consumers decide not to contest. The EESC recommends exploring mechanisms for ultra-fast justice (48 hours, online) and automatic compensation for proven misleading practices. The Commission could

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<sup>2</sup> OJ L, 2024/1781, 28.6.2024, ELI: <http://data.europa.eu/eli/reg/2024/1781/oj>.

<sup>3</sup> OJ C, C/2024/1799, 10.7.2024, ELI: <http://data.europa.eu/eli/C/2024/1799/oj>; OJ C 293, 18.8.2023, p. 77.

<sup>4</sup> OJ C, C/2026/6, 16.1.2026, ELI: <http://data.europa.eu/eli/C/2026/6/oj>.

<sup>5</sup> OJ C, C/2025/119, 10.1.2025, ELI: <http://data.europa.eu/eli/C/2025/119/oj>.

<sup>6</sup> OJ C, C/2024/2482, 23.4.2024, ELI: <http://data.europa.eu/eli/C/2024/2482/oj>.

take inspiration from the Irish example of the ‘small claims procedure’ for resolving small-scale disputes.

#### 4.5 Improving governance and cooperation

- 4.5.1 Regarding inequality and territorial vulnerabilities, the EESC regrets that the agenda does not consider consumer inequality to be a cross-cutting issue. The EESC recommends a place-based approach that integrates rural areas, urban peripheries, and overseas and cross-border regions. Mapping consumer vulnerabilities (commercial deserts, digital divide, energy and food insecurity) in Europe would make it possible to target action plans.
- 4.5.2 With regard to consumer associations, the EESC stresses that they play a vital role in defending rights, informing people and monitoring commercial practices. The EESC would like to see an increase in both the European funding allocated to them and their capacity for action, particularly to enable them to carry out independent comparative tests, undertake collective action and monitor digital markets. Joint initiatives involving consumer associations and production and distribution companies could be encouraged.
- 4.5.3 With regard to the funding of consumer associations, the EESC recommends that Member States establish public funds to support consumer organisations, partly funded through fines imposed for infringements of consumer rights, digital law (DSA, DMA) and competition law. This model, which is already in place in Italy (EUR 15 million for 2022-2024), Quebec and Brazil, would help clamp down on infringements of consumer rights, compensate for the harm done to the general interest of consumers and permanently strengthen civil society’s capacity to act, thus helping to meet the consumer policy objectives set out in the institutions’ work programme.
- 4.5.4 With regard to consultation, the EESC recommends that the Commission exercise caution when relying on purely digital consultations, and strengthen its working relations with the European Economic and Social Committee, particularly through its Section for the Single Market, Production and Consumption, and Consumers and Environment Category.
- 4.5.5 As regards institutional representation, the EESC recommends expanding and strengthening the Consumer Policy Advisory Group (CPAG) in order to make it a more effective tool for consumer policies. By expanding and bolstering this group, it would be possible to go further than ad hoc consultations, and weave consumers’ point of view into the actual drafting of the rules, through co-creation mechanisms that would include permanent citizen panels, environmental NGOs, distributors, and organisations representing vulnerable people. The participation of an EESC representative would be beneficial.

Brussels, 29 April 2026

*The President of the European Economic and Social Committee*  
Séamus BOLAND