

BEUC initial response to DG SANCO consultation on future consumer policy strategy

1. INTRODUCTION

This document presents preliminary reflections by BEUC on the post 2013 consumer policy strategy. The aim of this paper is to input into DG SANCO's preparatory work for the next Commission's consumer policy strategy. Our comments below are mainly responses to DG SANCO's list of "Possible issues to be considered in the context of the preparation of the post-2013 Consumer Policy Strategy and Programme of Community Action" sent to the attention of the ECCG in April 2010.

It is important to note that these initial comments are only a first step and of transitory nature as BEUC will make a more profound contribution and deliver its own vision for a future consumer policy strategy in the first half of 2012 at the occasion of our 50th anniversary celebrations. We will of course feed the results of this reflection into the EU deliberation process as soon as they are available.

1.1. A more holistic approach is needed

BEUC welcomes the various bullet points that are listed in the mail circulated by DG SANCO to ECCG members (reproduced below in the framed paragraphs) in the context of the preparation of the post 2013 Consumer Policy Strategy. It must be stressed however that the list transmitted by DG SANCO is not very explanatory as to the exact objective and content of the different initiatives indicated in the mail. It is difficult to provide an adequate input in the absence of more information on the effective scope of the different initiatives.

Most importantly, we would like to underline that DG Sanco's list of potential issues to be included in the future strategy appear to be far too limited and in need of improvement:

- while being presented as the outline of the future EU Consumer policy strategy, the content of the initiatives is clearly restricted to what can be considered as DG SANCO's current portfolio. It is however essential that, at EU level, a "holistic" approach is pursued to ensure that there exists a strong consumer policy that encompasses the competences of all Commission services.
- as detailed below, the almost exclusive focus is set on process rather than on content of consumer policy. Policy objectives in specific sectors are not addressed in terms of identification of the consumer challenges, possible responses and EU input and consequent objectives. This is for example the case in the area of transport, financial services, environment, information society, intellectual property rights, anti-competitive practices, CAP? Etc. Even those initiatives that fall within the scope of DG SANCO, such as food, safety and health, are not addressed in the document as to the promotion of the consumer interests that should be achieved. This is surprising and a major concern in relation to the present DG SANCO approach. While process is important – content is even more so.

1.2 Consultation process

While welcoming the consultation launched by DG SANCO towards the ECCG to feed into the post 2013 EU consumer policy strategy (CPS), BEUC regrets the process with which this consultation was launched. It is regrettable that there no information on the different steps that are or will be undertaken to finalise the consumer policy strategy has been provided at this stage.

The consultation of ECCG was launched mid-April, with no prior notice nor framework setting on the different milestones towards the finalisation of the CPS. This implies that the ECCG, and its members, are not put in a position to assess the timeliness of their contributions, nor the investment that should be made in term of content contribution with regard to the ability to influence the decision making process in due time. It is therefore urgent for the Commission to publish the timeline and the different elements of the policy setting: will there be a public consultation? Will there be an impact assessment? Are there consultants/experts working on the strategy? When will the College take a decision? What is the link with the financial perspectives? When will the European Parliament and the Council be involved?

A multi-annual Commission consumer policy strategy should to be backed by the opinion of the body that has been set up to be consulted on consumer policy matters.

Knowing what the Commission and other consumer organisations or stakeholders say and being able to comment would in our opinion lead to a better end product – even if the process may take a bit more time to conclude. Therefore, BEUC welcomes the current efforts made by DG SANCO to organise a meeting still in June 2011 and hopes that the Commission will be able to adapt the timeline for the preparation of the strategy in a way that the opinion of the ECCG and any comments and suggestions made a the upcoming meeting can still by taken into account.

1.3 What role of the Consumer summit ?

The consumer summit that took place on 11-12 April in Brussels would have been a good opportunity to advance in the discussions on the priorities to develop when defining the future CPS. Many consumer experts were present, some of them being consumer representatives. However, unfortunately the Summit was not used as a tool to make real progress on a shared vision for the future CPS: some of the workshops focused on long identified needs and features, while in others, it was decided by the Commission that some topics, such as collective redress were not to be discussed. Many of the participants were not experts in consumer policy or representing consumer organisations. While the summit was presented as a bottom up exercise, many participants from the consumer movement felt that their discussions were framed and that the directions were set by the Commission rather than by the stakeholders.

1.4 Need to give a boost to the future Consumer Policy

The major part of the items proposed by DG SANCO for the strategy is more about the process than about the objective: better understand consumers, integrate the consumer perspective in other policies, creation or enhancement of exchange of

information and coordinating systems (RAPEX, CPC, ECC, ...), awareness raising and education, support to consumer organisations.

We very much welcome all the initiatives that are listed. However, it is essential for them to be combined with more fundamental measures that tackle the key questions that have to be addressed by the EU in the context of a strong policy of promotion of the consumer interests. They should be put in line with the ambitious announcements made by President Barroso at the eve of his second mandate: ***putting consumers at the heart of the Single Market!***

Consumer relevant Community policies are currently scattered around within various DGs. The items listed by DG SANCO seem to be oriented exclusively on the current portfolio of DG SANCO mirroring its limitations. They do not reflect a global, inclusive, ambitious consumer policy strategy that would be the ***fil rouge*** of the works to come of all Commission services, and beyond them of all EU institutions. Therefore, the strategy must be complemented by a more visionary approach on the initiatives that have to be taken to improve the position of the consumer on the EU market, and beyond, in the different sectors that are consumer relevant: food, health, financial services, product safety, transport, environment, etc. In this context, the BEUC 2011-2014 work programme, approved by the Commission at the end of 2010, which lists the challenges faced by consumers within the EU, could provide some inspiration.

2. CONSUMER MARKET MONITORING AND CONSUMER BEHAVIOUR

DG SANCO: Enhancing the consumer market monitoring (Consumer Market Scoreboard and in-depth studies) and the understanding of consumer behaviour to better identify market malfunctioning and facilitate smarter policy design

Defining the frequency and markets coverage of consumer market monitoring to properly support the Commission work in the field of consumer policy

Developing the understanding of consumer behaviour and adapting policy design as a consequence

Further increasing the usefulness of data for the design of policies at EU and national level, including the National Reform Programmes under Europe 2020

The tools defined by the Commission to enhance consumer market monitoring are very much welcome. BEUC supports the CMS and the in-depth studies, as they provide the evidence to base policy measures.

However, in the context of current policy making, not enough attention is granted to the results of the studies, leading to inconsistent decision making between understanding of consumer biases and definition of (not very useful) consumer protection measures. Even within DG SANCO, there are gaps between the fact finding stage and the policy making stage.

Studies and monitoring must have real informative value. It is therefore vital that the principles of transparency and methodology are respected. The same applies to the conclusions drawn from these for further political decisions.

Therefore, it is essential, in the future strategy, to focus on a closer and stronger link between the monitoring and studies on the one hand, and consumer policy design, on the other hand. This link should also be extended to other EU policies where they have an impact on consumers.

3. CONSUMER RIGHTS / CONSUMER LEGISLATION

DG SANCO: Strengthening consumer rights and further improving the integration of consumer interests into all relevant EU policies

This section is key to set the ambition of the future EU approach towards the promotion of consumer interests. It is in continuity with previous strategies. We would firstly ask to separate these two issues of consumer rights and the integration of consumer interest, as both are fundamental elements of each strategy on consumer policy.

As a general approach towards EU consumer policy, EU institutions should take responsibility to draw the conclusions from the big political and practical problems with the Commission's more recent preference (as expressed in the current consumer policy strategy) for full harmonization as the allegedly only appropriate legislative **harmonisation technique** that should be adopted at EU level when it comes to the promotion of the consumer interest through legislation: indeed, there is currently no evidence that the current approach of the EU, that only allows for maximum harmonisation of consumer legislation, effectively leads to consumer welfare. The Commission should engage into a profound reflection on the use of this technique, bearing in mind that the goal of consumer policy is consumer welfare and not market integration. It should, where appropriate, have the courage to abandon the maximum harmonisation approach and come back to the minimum harmonisation approach that contributed in the previous years to a dynamic progress in consumer protection all over the EU and/or combine both harmonization techniques according to the issue at stake and the needs of European consumers.

The Commission's new and forcefully promoted preference for "optional" tools to regulate consumers' contractual rights is a wrong policy approach and should be urgently re-considered before any further decisions are taken. We strongly regret that the Barroso II Commission seems to be determined to disregard the opinion of the stakeholders which are most concerned, namely consumer organisations and SME's.

Linked to this, the Commission should engage into a proactive policy of proper definition of **smart regulation**, leading to limitation of administrative burdens, too often confused by professional stakeholders with elimination of consumer protection rules. While we are also in favour of reducing bureaucratic burdens, we stress the need for a clear distinction between consumer protection rules and administrative burdens.

4. INTEGRATION OF CONSUMER INTEREST INTO OTHER UNION POLICIES

DG SANCO is in charge of providing input from the consumer perspective to the preparation of the different Commission proposals. However, we are still waiting for a

systematic approach reflected by an institutional architecture and corresponding tools to mirror the obligation enshrined in the TFEU. For example we have been calling since a long time for a report to be published by the Commission on the integration of consumer interests into all relevant EU policies, to be submitted to the other EU institutions and to democratic scrutiny. Recently, the European Parliament (Grech report on the Single Market) has also called for a more systematic reporting on this important aspect of consumer policy.

5. SUSTAINABLE PRODUCTION AND CONSUMPTION

DG SANCO: Moving towards more sustainable patterns of consumption

BEUC welcomes this item and proposes to orientate the focus of this headline to the following elements:

Misleading green claims need to be tackled

Consumers are confronted with a growing number of green claims which are often unsubstantiated, unclear and not comparable. For this reason, consumers are hardly enabled to make sustainable choices.

To change behaviour, consumers need shortcuts such as credible third-party verified excellence schemes such as the EU Ecolabel.

Ensure a policy mix to tackle the sustainability of products

A consumer strategy should look at how the demand side for sustainable products can be strengthened. This requires a policy mix of mandatory minimum requirements (e.g. ecodesign requirements) for more products, mandatory information (e.g. through the Energy Label) and voluntary instruments (e.g. the Ecolabel). On the production side, more needs to be done to ensure that consumers will be offered more sustainable products at affordable prices. Moreover, the work with retailers should be intensified and instruments should be put in place which allows comparing the environmental performance of retailers.

Protecting consumers from hazardous chemicals

We call on the Commission to undertake concrete actions in the context of the next consumer strategy which will contribute to lowering the exposure of consumers and the environment to hazardous chemicals including substances which have endocrine disrupting properties. Consumers are exposed to a cocktail of synthetic chemicals everyday, many of which are known to cause **cancer**, to be **toxic** or to **disturb the hormone system**. The effects of chemicals are traditionally evaluated on the basis of single substances, chemical by chemical. Consequently, also the risk management measures are based on single substances leaving out the **chemical cocktail effect** although the combined effect is greater and more toxic than the effect of single substances. Moreover, the negative effects of chemicals depend more on the timing of exposure than on the dose, i.e. exposure in critical stages of development may lead to life-long negative effects. Research suggests that there are **low-dose effects** which means that exposure to very small amounts of endocrine disrupting chemicals (EDCs) may already unbalance the hormonal system. Therefore we cannot exclude that toxicologists who are responsible for assessing exposure have been misguided in past decades and have given false assurances of safety.

Protecting consumers and the environment from unknown risks of nanomaterials

More and more products appear on the markets which claim to contain nanomaterials. BEUC sees an urgent need to assess the safety of nanomaterials before they can be used in consumer products. We are in particular concerned about nanomaterials which are not properly fixed in the material of the products and therefore may release nanoparticles during the products life-cycle, thus resulting in an exposure of consumers and the environment. The safety of nanomaterials should be assessed by knowledgeable independent scientific committees before they can be used in consumer products. The safety of products which are already available on the market should urgently be assessed and should be withdrawn from the market if they are not safe for human health and the environment.

We are concerned that most of the research which had been carried out so far has been oriented towards innovation and new applications. However, we call on the Commission to prioritise research towards, safety, health and environmental risks of nanomaterials which could be used for risk assessment and risk management procedures.

Sustainable food

Food consumption and in particular food waste and food packaging waste are sectors where major progress can be made towards more sustainable consumption patterns.

Consumers are becoming increasingly concerned about the origin of the food they consume and its environmental impact. At the same time, consumers are exposed to a rising range of different green labels on their food packaging and are becoming overwhelmed and confused rather than informed by the proliferation of such labels. As a result, consumer trust in green claims is being undermined by lack of understanding of, and lack of familiarity with them. Clarity, consistency, impact, independence and evidence are the five key guiding principles that should underpin a sustainable labelling scheme. There is a need for a clearer approach to sustainability labelling on foods so that consumers can make more informed choices

Awareness of food waste as an issue is currently low among consumers but rising with environmental awareness as a whole. Around 90 million tons of food waste are generated in the European Union (EU) each year with food waste generating about 170 Mt of CO₂ e.g. in the EU each year.¹ It is a complex problem that requires a multifaceted approach and should be addressed in the future strategy.

¹ Final Report – Preparatory Study on Food Waste Across EU 27, European Commission (DG ENVI – Directorate C), October 2010

6. THE DIGITAL ENVIRONMENT

DG SANCO: Opportunities and threats for consumers brought by the development of digitalisation

This element reflects indeed upon one of the major challenges currently faced by consumers and should be one of the priority elements of the future strategy.

The promotion of the interests of the digital consumer, including the protection against threats constitutes a major challenge for the current and future EU decision maker. There are significant challenges to tackle in this area to provide the consumer with a safe digital environment, and the following could lead to the definition of a focus policy:

- ICT should be consumer centric, i.e. they should be developed in such a way as to meet their expectations, satisfy their concerns and respond to their real-life situations. Consumer control of such technologies should be easy to exercise and should not burden consumers with endless requests.
- Consumers' fundamental rights should be respected, especially the protection of their personal data
- There is a need to carefully monitor and stimulate competition in the EU telecoms market to ensure consumer choice and quality
- Access to telecommunications networks must be guaranteed, as a means of social and economic inclusion
- Consumers must be granted broad access to goods and services online. This means tackling geographic restrictions, availability of efficient, simple, secure and affordable payment services, as well as limitations linked to the enforcement of copyright.

More generally, there are important threats for consumer access to goods and services, as well for consumer criminalisation in the context of a imbalanced definition and implementation of a EU intellectual property rights policy. It is essential, both in the online and the offline world, to strike a fair balance between the need to protect creativity and the right to access to knowledge, information and culture.

7. LIBERALISED MARKETS

DG SANCO: Consumer choice in recently liberalised markets (especially Services of General Interest) or increasingly complex markets

Recently liberalised markets have not yet delivered their expected benefits to consumers. Consumer choice remains theoretical and in real life, the situation of consumers on those markets has often worsened than improved, in terms of bargaining power, transparency, billing, complaints handling. This market shortcoming has to be addressed by a proper strategy.

It is however important ***not to limit EU action to the issue of consumer choice.*** Indeed, beyond consumer choice, the challenge that has to be tackled in recently liberalised or complex markets is that of protecting the consumer in the content and scope of rights: fairness of contract terms, fair marketing practices, effective complaints handling systems,... this should be a priority within the EU consumer policy strategy.

8. SOCIAL INCLUSION

DG SANCO: Social inclusion/vulnerable consumers

Social inclusion and the specific situation of vulnerable consumers have often been mentioned by the EU in the past. However, this has not systematically enough led to any specific protective measure. It is important for these groups that the EU takes a more proactive stance and defines clear priorities to address their weaknesses in the different sectors that have specific impact on the vulnerable consumers: energy, food, health, financial services, etc. But also, more horizontally, specific attention must be granted to those vulnerable groups when designing standards for safety of products and services, lay-out and content of information, when regulating marketing of goods and services, etc.

In this context, it is important to expand the analysis to include not only economically vulnerable consumers, but also other categories of vulnerable population groups, such as children, the elderly, pregnant women, disabled persons, people living in rural areas, immigrants, refugees, minorities etc.

9. PRODUCT AND SERVICES SAFETY

DG SANCO: Strengthening product and services safety

Ensuring the stability and continuity of the product safety system by defining a long-term perspective for the operation of the RAPEX network and the coordination of joint surveillance actions with Member States

Pursuing the development of international cooperation to deal with the globalisation of production chains

Product safety constitutes a fundamental and major objective of any market regulation. In the evaluation of the current strategy, improvement of product safety played a major role. It has been pointed out that the strategy enhanced market surveillance cooperation (e.g. through the EMARS project and through PROSAFE) and the functioning and use of RAPEX. We welcome these past activities and call on the Commission to continue efforts which aim at improving the functioning of RAPEX and enhancing cooperation of market surveillance authorities. We believe that it is urgent to establish a coherent system for market surveillance across the EU.

The future strategy should aim at:

- Establishing a more effective regulatory framework, allowing quick market interventions and reliable long-term solutions, without delegating political

decisions to the standardisation bodies. In this context, the GPSD should allow for the establishment of product-specific rules without limitations, either in terms of content or the period of applicability. The legislator should also be able to use an alternative to standardisation.

- Providing for an opportunity to apply higher conformity assessment modules than industry self declaration: We call for introduction of a provision that allows conformity assessment procedures involving third parties to be established for products which may pose significant risks to consumer health and safety.
- Ensuring that a comprehensive European legal framework for the safety of consumer products and services is in place. To this end there is a need for strengthening the GPSD and taking actions at the European level to ensure the safety of consumer services is legally addressed.
- Ensuring a more effective market surveillance system through:
 - the strengthening of the European framework for market surveillance
 - improved product traceability
 - wider access to information about dangerous products
 - the establishment of an EU-funded accident statistical system
 - the creation of a European complaints handling and reporting point
 - the creation of collective redress mechanisms
- Ensuring the safety of child-appealing products through the GPSD by including a legal definition for child-appealing products, introducing specific safety requirements for child-appealing products, maintaining the prohibition of dangerous food-imitating products. This would be also an implementation of the objective of addressing the specific needs of vulnerable consumers.
- Making specific reference to people with disabilities under categories of consumers at risk: this would again be an implementation of the objective of addressing the specific needs of vulnerable consumers.

10. ENFORCEMENT AND REDRESS

DG SANCO: Ensuring the enforcement of consumer rights and redress

Strengthening cooperation through the network of enforcement authorities (CPC Network) network through reinforced coordination of the network operations, in particular foster exchanges of expertise and best practice through joint actions

Increasing consumer awareness about the European Consumer Centres network (ECC-net) and explore how to strengthen cooperation between EEC-net and enforcement bodies, including on ADR

Putting greater emphasis on consumer awareness campaigns of a preventative nature and consumer education initiatives

Raising consumer and business awareness of consumer rights and the means to resolve disputes and obtain compensation

Examining the possibility to support Alternative Dispute Resolution (ADR) and on-line dispute resolution (ODR)

We welcome the initiatives that are proposed by the Commission as they reflect awareness that consumer rights are irrelevant if it is not possible to enforce them.

We are however disappointed to see that the DG SANCO list is lacking any reference to collective judicial redress, which is a major element of a strong consumer policy strategy, as it has been acknowledged in the evaluation of the present strategy that it has not been very effective in that respect. There is a major need for a more ambitious approach on behalf of the EU to address this blatant gap in the consumer toolkit to enforce his rights.

The raising of consumer and business awareness of consumers rights should naturally be part of the strategy, however, recent studies and surveys indicate that the focus should be put more on trader awareness, because a vast majority of them is not aware of consumer rights as fundamental as the two years legal guarantees or the length of the withdrawal period. This has the effect that even if a consumer is aware of his rights, he will have to face a trader who refuses to grant him these rights, in good faith, because of ignorance. With increased trader awareness there is a potential of more complaint prevention, as well as of increased satisfactory handling of complaints at the level of the trader himself.

The cooperation of authorities in consumer policy enforcement has to be welcomed, developed and strengthened. BEUC would very much favour that the Strategy also explicitly includes common sweeps as they have been carried out by the previous Commission. These are initiatives that raise awareness, illustrate and facilitate cooperation between authorities; identify obstacles to and differences in consumer enforcement and puts pressure on the professional sector concerned.

ADR in our opinion is not part of the enforcement system, but belongs to redress. It appears that the reference in DG SANCO's document on ADR and ODR does not take into account that these items have been announced as flagship initiative in the Single Market Act and thus will be given priority and a quick adoption of the forthcoming legislative proposals will be aimed at. Even if the current discussions within the EU on a regulatory framework for ADR/ODR could be finalised before the entry into force of the new strategy, this would be far from implying that objectives are achieved. On the contrary, the practical implementation of these potential tools will require a strong and determined strategy to ensure that consumers effectively benefit from them.

11. CONSUMER REPRESENTATION

DG SANCO: Supporting consumer organisations:

Defining the appropriate support to EU level consumer organisations

The funding of NGOs, and in the context particularly as regards the funding at EU level of consumer organisations such as BEUC and ANEC constitutes a fundamental prerequisite to guarantee a democratic EU decision making.

Indeed, it makes it possible for organisations that represent the general public interest, to feed into the EU policy and legislation making process and to try to counter balance the overwhelming resources of the private business sectors in this respect. The funding received from the EU budget allows BEUC to respond to

consultations, to participate in a very high number of expert and working groups, to interact with the Commission, the European Parliament and Council by providing the genuine consumer perspective when EU policy and legislation is defined, designed and implemented.

The funding also enables BEUC to provide the EU institutions with the input from member organisations from (nearly) all countries across the EU, thereby reflecting, as much as possible, the variety of consumer needs and expectations within Europe, yet speaking with one voice.

The big added value that BEUC brings to the EU policy making process has been clearly identified and highlighted in DG SANCO's external evaluation of the current policy strategy. Over the years, we were able to build up constructive relationships with the Commission, the EP and the permanent representations. In relation to the Council of ministers, BEUC regularly co-ordinates actions with its members to influence in a targeted and coherent manner the decision taken at national level in relation to EP policies/legislation. BEUC is recognised universally as the genuine voice of European consumer organisations and is consulted, formally or informally, by numerous Commission services, MEPs and permanent representations.

BEUC's involvement in the EU decision making process and its constant dialogue with EU decision makers has led to more consumer friendly legislation and policy making, thereby bringing the EU closer to its citizens. It could not have had the same influence without the financial assistance of the EU. It is therefore essential to continue, and even to strengthen the financial support, in order to enable the consumer representatives to contribute more strongly to the different EU policies.

Having one strong EU consumer organisation able to build up a horizontal dialogue with EU decision makers is an essential feature of the EU. In this context, we very much welcome the signature of a multi-annual framework partnership agreement that stabilizes our work programme for four years and makes reduces the administrative burden linked to the introduction of work programmes.

BEUC strongly advocates for the budget to be increased and at the very least kept at its present level. One of the major weaknesses of the European Union's integration process today is the lack of acknowledgment of its advantages and benefits by its own citizens; Consumer policy is one of the very few Union policies which is directly tangible by European citizens/consumers; Its reach out capacities are big but so far have not been sufficiently employed by the EU institutions. Putting consumers centre stage as promised by president Barroso for his second term of office needs the corresponding financial support.

The fact that other EU-wide organisations which are active in the promotion of consumer interests would also have a legitimate role to play and require financial support (for example financial services users, patients organisations, transport users), should be reflected in an increase of the overall EU budget line devoted to this funding, yet the funding should be dependent on the fulfilment of criteria including independence and representativeness.

Working together with national authorities to address the heterogeneity of the situation of national consumer organisations

BEUC very much welcomes the intention of the Commission to work together with national authorities to address problems faced by some national consumer organisations. Its vision paper, transmitted to the Commission in autumn 2010, contains some paths for reflection on how to improve the situation of the consumer movement in some countries. These reflections will be complemented by the recommendations soon available from field visits carried out in early 2011, as well as by the results of the conference organised in Warsaw on this issue on 19 May 2011, where DG SANCO will participate in the works. We hope that the final version of the consumer policy strategy will reflect some of the conclusions and recommendations of these works.

Adapting the support to capacity building for consumer national organisations

When it comes to support of capacity building for national consumer organisations, BEUC has developed, with EU funding, a training programme, well known as the TRACE-programme. TRACE has been evaluated positively in the context of the current strategy, as well as during the workshop devoted to capacity building during the recent DG SANCO Consumer Summit. In the future strategy, the strengths of the TRACE programme should be used to enhance the capacity building programmes, but also, it should be taken to the next level in order to deliver tailor made courses at EU, national or regional level. It is indeed important to adapt the training programmes available to current developments within the consumer movements, ICT and the challenges faced by consumers and their organisations in markets. More fundamentally, the idea of the establishment of a consumer training institute/academy with training courses for consumer organisations other non-profit parties, teachers, DGs, MEPs, government officials and public authorities, multipliers of vulnerable groups, media, etc, should also be explored, maybe also in combination with research activities that could be coordinated by this institute. It could also be envisaged to develop a consumer practitioner certificate, as well as to organise summer courses on top EU priority consumer topics.

Beyond Training and TRACE, the BEUC vision paper as well as the recommendations from the field visits carried out in selected countries in EU12, have identified other measures that could be identified and implemented at EU level in order to make it possible for the consumer movement in those countries to gain more influence on the decision making at national level, and therefore, indirectly, raise the profile of the consumer policy in these countries and at EU level. Among these measures, one can mention setting up independent start-up help service for consumer organisations, reach out and partnership programmes: incentive programmes such as mentoring and internships or entering partnerships with national organisations, universities, public authorities, and other consumer policy stakeholders.

12. INFORMATION AND EDUCATION

DG SANCO: Consumer information and education

Reviewing education tools to ensure that they are suited to users needs (content and presentation) and that they have an effective impact on their skills as consumers

Exploring the possible synergies with national curricula

Defining what consumer information, methods and tools to prioritise, using the lessons from behavioural economics

BEUC supports the objective of the Commission to engage into a review of the current education tools that exist at EU level in order to assess their effective impact on consumer skills. In this context, we especially draw the attention of the Commission to the need to engage into a genuine cost/effectiveness analysis based on a broad consumer survey, taking into account also the results of behavioural studies. This is especially the case when it comes to financial consumer education. It is also important to bear in mind that not all consumers can be reached through information and education measures.

It is also important to organise a structured link between consumer education and consumer information. Indeed, the consumer, where educated, must, in order to be able to use this education, have at his disposal the right information tools : eg in the food sector, it is not sufficient to educate the consumer into healthier food habits if the food products that he purchases can still contain irrelevant, potentially misleading or unclear information on their health effects. There is a need for coherence in consumer policy making.

- Educational tools should be more promoted (most schools, teachers don't know they exist)
- The tools could be used at the consumer training/academy and make the investment worthwhile

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