



Raising standards for consumers

POSITION PAPER

ANEC position on the new EU Consumer Agenda 2021 – 2027 Response to the EC Roadmap Consultation

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Which objectives for the new Consumer Agenda?

ANEC wants a new vision for the role of consumers & consumer policy in Europe, one that integrates consumer interests all relevant policies, some not adequately addressed today. We believe this crucial as our activities span important areas unusual for consumer policy. Beyond general product safety, standards are used as a tool for consumer protection in legislation on specific product safety, accessibility, the environment, services & ICT¹. Despite the negative impact and consequences of the COVID 19 crisis, standards have proven to be essential to protect society and the economy in emergency situations and in the new normal ahead. An inclusive standardisation system, with strong consumer participation, is a guarantee standards can play such a key role.

1 | No compromise on the safety of products and services

The GPSD needs revision to reflect the impact of new technologies on product safety². The concept of safety must be enlarged to cover security threats from IoT & AI. Revisions of product directives (e.g. Machinery Directive) must respect consumer interests also³.

The Consumer Agenda should support adoption of a horizontal law introducing basic mandatory cybersecurity requirements for connected and AI products.

We also ask for creation of a legislative framework at European level on the safety of services, underpinned by specific standards.

2 | Improve enforcement again, again and again

During the Covid-19 pandemic, thousands of non-compliant protective masks entered the market, a clear example of laws & standards being of little value if not enforced. There needs to be more joined-up coordination among national authorities, aided by the EU level (e.g. joint market surveillance actions) as well as international cooperation.

3 | Consumers at the heart of the digital transition

Actions to build trust of consumers in the privacy & security of their personal data in the digital environment are urgent.

The assumption that informed consumers will make the best choices for themselves is challenged by digital technologies. In a time of information asymmetry, this does not always hold (eg: consumers with different cognitive abilities). Consumer protection principles should be introduced in the design of products & services, with standards a

¹ [ANEC Work Programme 2020](#)

² ANEC will reply separately to the consultation of the General Product Safety Directive.

³ [ANEC Position paper on the Revision of Machinery Directive \(2006/42/EC\)](#)

tool to embed such principles in technologies (“consumer protection based on sustainability principles by default and by design”).

4 | Consumers at the heart of the green transition

Knowledge about product characteristics (e.g. safety & environmental performance) is a prerequisite for consumers to be actors in the green transition. However, such knowledge can be achieved only if information is coherent, reliable, understandable & transparent.

We believe the legal framework does not protect consumers enough from hazardous chemicals, and so call for introduction of a European horizontal legislative framework for chemicals in consumer products⁴.

Ecodesign should be extended to the broadest range of products, with measures for waste prevention. Enforcement & extension of environmental standards & labelling schemes that have been successful (e.g. Ecodesign & Ecolabel) should be a priority, if levels of welfare are to be increased.

The recovery from COVID-19 should use a Circular Economy model that cuts use of resources & reduces impacts on the environment & human health.

5 | From what to how: addressing consumers vulnerabilities and asymmetries

ANEC believes empowerment of individual consumers needs to be complemented by empowerment of the authorities & associations entrusted with consumer protection.

Consumer empowerment must not avoid or replace the protection of all consumers, vulnerable or not⁵. Reflection is needed on new elements that put consumers in a vulnerable situation, with rules and policies being adopted to tackle vulnerabilities by default. In addition, the needs of the often-discriminated consumer groups like children, persons with disabilities and older persons must be adequately addressed.

Using knowledge built during their activities, national consumer organisations can directly contribute to consumer policy, without the intermediation of consultants and contractors. But for this knowledge to be used at European level, a new structure is needed, reflecting the cross-sectoral nature of consumer affairs and to learn from the national situations and the effects of EU initiatives in the national contexts. National consumer organisations play a vital role in independently representing the collective consumer voice. Moreover, consumer organisations often lack resource and capacity-building should be ensured (eg: to increase consumer participation in national standardisation).

ENDS.

⁴ [ANEC comments to 2020 Roadmap for a new Circular Economy Action Plan](#)

⁵ ANEC Position paper: How to protect vulnerable consumers?, December 2011



ANEC is the European consumer voice in standardisation, defending consumer interests in the processes of technical standardisation and the use of standards, as well as related legislation and public policies.

ANEC was established in 1995 as an international non-profit association under Belgian law and is open to the representation of national consumer organisations in 34 countries.

ANEC is funded by the European Union and EFTA, with national consumer organisations contributing in kind. Its Secretariat is based in Brussels.

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