UNIONE CONSUMATORI ITALIANI
ENTE DEL TERZO SETTORE

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To whom it may concern.



CONSUMERS FIRST

Protecting markets Consumers can trust

A policy paper proposed by the Italian Consumers Union

This paper sets out policy recommendations put forward by Unione Consumatori Italiani e.t.s. (UCI) in the context of the forthcoming work of the European Parliament's Committee on the Internal Market and Consumer Protection (IMCO). It takes into account similar positions already expressed by other stakeholders on the same issues and seeks to broaden and develop those positions, contribute further to the public debate and represent consumers' interests more effectively before policymakers.

The EU must lead on Consumers protection

As the European Union shapes its regulatory policy, it should keep the interests of Consumers in clear view. Consumers deserve protection from unsafe products, misleading practices and unfair terms, and those who break the rules should be held accountable.

Europe has 450 million Consumers, and their spending accounts for more than half of the EU's GDP. They are the true foundation of the economy, which is why the system around

them must work well. People should be able to trust what they buy and consume. That trust depends on rules that keep them safe, and enforcement against criminals and others who ignore the rules. At the same time, unnecessary and repetitive regulations can drive up costs for Consumers without adding meaningful protection. A consumer-first market needs clear, proportionate rules that make compliance easier for legitimate businesses and effective enforcement against sellers that ignore them.

The One Europe, One Market roadmap, signed by Parliament, the Council and the Commission on 24 April 2026, provides a shared commitment to simpler rules, a more integrated Single Market and stronger competitiveness, with targets for agreement on its initiatives by the end of 2027. Consumer protection legislation should support that direction by reducing unnecessary burdens and closing gaps in enforcement. The European Parliament's Committee on the Internal Market and Consumer Protection (IMCO) must help lead the way by keeping Consumers at the centre of its work.

Consumers are the economic foundation

Consumers are not merely an economic category. Without them, Producers would have no customers and the whole system would slow to a halt. Consumer demand drives supply, encourages innovation and judges what works. Companies should treat Consumers as a treasure: something worth protecting and investing in.

The figures point the same way. Household spending makes up over 51% of EU GDP, more than any other part of the economy. Consumers should be able to rely on a few basics: products and services that are safe and well made, honest advertising and information and fair treatment by businesses.

Simpler rules can strengthen Consumer protection

Rules only help if they work in practice. A seller who avoids taxes, ignores product requirements or breaks sales restrictions should not gain an advantage over those who follow the rules. When rules differ widely from one Region or Country to the next, the market becomes distorted and people find ways around the protections meant for the most vulnerable Consumers.

The Commission is already looking at this in its 2027 Work Programme. It is considering a measure to stop new single-market barriers from arising, and it wants to address additional national requirements added when EU legislation is put into practice. Territorial supply constraints are part of the same problem. When suppliers restrict sales by Country, Consumers face price differences and less choice.

Simplification should therefore be part of consumer protection. Unnecessary or repetitive requirements can increase the cost of producing and selling legal goods. Where those costs are passed on, Consumers face higher prices. Where demand persists and enforcement is weak, making legal products more expensive or harder to obtain risks moving purchases into markets where consumer safeguards cannot be relied upon.

📦 Online sales from China: keeping pace with trade

Online sales from China are growing so quickly that it is fair to ask whether the controls meant to keep Consumers safe can keep pace. About 4.6 billion low-value parcels entered the EU in 2024, roughly 12 million a day and twice as many as the year before. 91% came from China.

These parcels account for around 97% of imported items but only about 2.1% of import value, with an average price under €9. That makes them difficult to monitor. The EU's Safety Gate alert system recorded 4,671 alerts on dangerous products in 2025, a record, 13% more than in 2024.

Shoppers cannot tell a safe product from an unsafe one at the point of sale, and sellers who break the rules undercut those who follow them. Imports from China or elsewhere must meet the same applicable requirements as products sold by law-abiding European businesses.

💻 Digital markets: protecting Consumers from unfair practices and illegal products

The way a website or app is designed can influence what people decide to buy, so consumer rights may need to keep pace with digital services. Dark patterns are design tricks that push people into choices they would not otherwise make. Examples include countdown timers

that create false urgency, fees that appear only at checkout and subscriptions that are easy to join but hard to cancel.

A 2022 Commission study found that 97% of popular websites and apps used at least one dark pattern. The Commission's Digital Fairness Fitness Check (October 2024) found that harmful commercial practices online cost EU Consumers at least €7.9 billion a year.

This shows how unclear or rarely applied rules let these tricks cost Consumers real money. The answer is clear rules that authorities apply in practice. Protecting children online must also cover the products they can buy. Seller traceability, effective age verification for age-restricted goods and clear platform responsibilities are needed to prevent illegal products from reaching Consumers across borders, building on the Digital Services Act.

Consumer protection priorities for IMCO in 2027

Several forthcoming and ongoing files should be priorities for IMCO in 2027. Together, they provide an opportunity to apply the One Europe, One Market commitment to simpler rules, stronger enforcement and consumer protection across borders. Their timetables differ, with some proposals expected before 2027 and others subject to further development.

- **Digital Fairness Act**: IMCO should focus on clear, enforceable protection against dark patterns and other unfair online practices, particularly those affecting children. The initiative should close gaps in consumer protection while simplifying overlapping requirements and working coherently with the Digital Services Act. This includes addressing easy access to counterfeit and illegal goods that pose risks to children online. In this regard, the European Commission has also made a valuable contribution through its proposal (COM(2026) 1100, dated 11 November 2026.

- **Consumer Protection Cooperation Regulation review**: The roadmap sets a target for agreement by the end of 2027. IMCO should prioritise stronger cooperation between National Authorities, effective action against sellers operating across borders and practical remedies for Consumers whose rights have been breached. Each member state is an entry point into the Single Market. Without coordinated enforcement and streamlined rules, illegal sellers easily gain access to the Single Market. In this regard, the European Commission has also made a valuable contribution through its proposal (COM(2026) 1120, dated 11 November 2026.

- **European Product Act**: The roadmap also targets agreement on this initiative by the end of 2027. IMCO should focus on clearer product requirements and stronger market surveillance, including for goods sold online or imported from outside the EU, so that compliant businesses are not undercut by sellers that evade the rules.

- **Tobacco Products Directive revision (TPD3)**: With the Commission's indicative timetable pointing to a proposal in December 2026, the revision is a file for IMCO to follow closely in 2027. Its contribution should address cross-border sales, online youth access, proportionate product requirements and enforcement against illegal supply, alongside public health scrutiny.

Assess how Regulation affects Consumers and illegal supply

Across these files, IMCO should examine whether proposed rules strengthen the regulated market through which consumer safeguards are delivered, or risk pushing more purchasing toward sellers that offer none of those protections. Its scrutiny should focus on five questions.

- **Costs and prices**: will the proposal impose unnecessary costs on compliant businesses that could be passed on to Consumers?

- **Legal availability**: will it restrict access to products for which demand is likely to persist, creating opportunities for illegal suppliers selling unregulated goods?

- **Market fragmentation**: will differing national requirements make lawful trade more costly and complicated while sellers outside the regulated market ignore those requirements?

- **Enforcement**: can authorities enforce the proposed restrictions against illegal sellers, or will the burden fall primarily on businesses already following the rules?

- **Simplification**: could clearer, more consistent requirements achieve the intended protection while reducing the price advantage of sellers that evade taxes and standards?

Each of these areas points to a common need: rules that are clear and enforced are rules that deliver. IMCO is well placed to help turn consumer protection into practice. IMCO can keep consumer protection high on the EU agenda, bring together institutions, authorities, platforms and consumer groups, and look at whether rules actually work. Across these files, IMCO should scrutinise market access, digital sales, consumer economic interests and enforcement. For TPD3, joint consideration with the Public Health Committee would bring both areas of expertise into the legislation.

➜ The way forward

Consumers are the strength of the economy, and protecting them depends on enforcing the rules. The cases in this paper show the same thing: protection that goes unenforced protects no one. The EU should keep the legal market safe, assess how regulatory costs affect Consumers, make its rules clear and enforce them in line with the One Europe, One Market commitment to simplification and market integration.

IMCO can help make that happen, and the *Unione Consumatori Italiani* would welcome the chance to work with it and other institutions in that effort.

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