

Euroconsumers' response to the Consumer Agenda 2025 – 2030

30 August 2025

Empower People, Improve the Market

Euroconsumers¹ and its member organisations in Spain (OCU), Italy (Altroconsumo), Belgium (Testachats/Testaankoop) and Portugal (Deco Proteste) strongly believe that a competitive Europe needs empowered consumers at its heart. People are not just passive participants in the economy but drivers of innovation, competition, and growth. When well-informed and protected, they can push markets to deliver innovative products and services that truly meet their needs.

The Consumer Agenda 2025–2030 is an opportunity to recognise that consumer protection and market competitiveness are not opposing goals. Far from being a barrier, robust consumer rights are an industrial asset. Without them, inefficient firms thrive at the expense of better ones, quality declines, and fair competition suffers.

Strong consumer policy fuels competition by ensuring people have the right information and the ability to act on it. It drives innovation by giving businesses the confidence that their investments will reach engaged, trusting customers.

Empowered consumers and competitive markets are mutually reinforcing. The 2025-2030 Consumer Agenda should put consumers firmly at the table, making their empowerment a cornerstone of Europe's long-term competitiveness, sustainability, and resilience.

State of Play

As the European Commission prepares the Consumer Agenda for 2025–2030, it is essential that the voices of consumers guide its priorities. To better understand what directly impacts consumers today, Euroconsumers surveyed consumers in Belgium, Italy, Spain, and Portugal ahead of the 2024 European elections.² The findings highlight both persistent challenges from the last mandate and emerging priorities that must shape the Commission's agenda going forward.

Affordability and the cost of living remain at the forefront of consumer worries. Inflation, rising energy bills, and food prices have continued to strain household budgets throughout the past mandate. Looking ahead, the top priorities consumers want the Commission to focus on under this mandate are guaranteeing access to affordable medicines (83%) and healthy and sustainable food (74%) – a clear signal for any EU policy in these areas.

¹ **About Euroconsumers:** Gathering five national consumer organisations and giving voice to a total of more than 6 million people in Italy (Altroconsumo), Belgium (Testachats/Testaankoop), Spain (OCU), Portugal (DecoProteste) and Brazil (Proteste), Euroconsumers is the world's leading consumer Group in innovative information, personalised services and defence of consumer rights. Our European member organisations are part of the umbrella network of BEUC, the European Consumer Organisation. Together we advocate for EU policies that benefit consumers in their daily lives.

² **Euroconsumers (2024),** *EU Election Fever: Taking consumers' temperature.* <https://www.euroconsumers.org/wp-content/uploads/2024/05/Euroconsumers-Election-Survey-report.pdf>

Digital empowerment also rises as a key concern. 74% of respondents want the EU to tackle online scams, and 72% stress the need to prevent AI from spreading fake or misleading content. Protecting minors on platforms, enhancing cybersecurity, and giving consumers control over their data are equally rated as very important. This focus underlines the need for the EU to advance robust digital rights that empower consumers in an increasingly complex online environment.

Although opinions on the Green Deal's progress are varied, 65% of respondents recognise the significance of EU policies supporting the green transition. Simultaneously, consumers stress the need for affordable options food, energy and mobility, which remain top priorities for them.

Finally, the survey reveals a significant information gap: only a quarter of respondents feel well-informed about EU policies and institutions impacting them. Bridging this gap through transparent communication and meaningful consumer engagement is essential to rebuilding trust and legitimacy.

In summary, the Consumer Agenda must address these expressed priorities with concrete, impactful policies that resonate with consumers' lived experiences, balancing ongoing affordability challenges with growing demands for sustainability and digital protection.

1. Affordability

Surviving not Thriving

Euroconsumers' election survey found that two-thirds of consumers (64%) rank inflation and rising living costs as the top challenges the EU must address in this parliamentary term. These numbers are grounded in the real financial pressures felt by households every day.³

Each year, our Affordability Barometer surveys consumers across Italy, Belgium, Spain, and Portugal to understand how affordable everyday expenses are and how they affect quality of life. The 2025 edition reveals that many households still struggle to save or cover essentials like medical care, while optimism about the future is declining.⁴

Across all surveyed countries, food, especially meat, fish, vegetables, and fruit, remains a heavy burden. Despite easing prices and stabilised energy markets, utility costs like gas, electricity, and water continue to strain monthly budgets.

³ **Euroconsumers (2024)**, *EU Election Fever: Taking consumers' temperature*. <https://www.euroconsumers.org/wp-content/uploads/2024/05/Euroconsumers-Election-Survey-report.pdf>

⁴ **Euroconsumers (2025)**, *Affordability Barometer 2025: Consumer index – Savings are not an option*. https://www.euroconsumers.org/wp-content/uploads/2025/05/Affordability-barometer-2025_final-13.05.pdf

Saving remains difficult. Even as inflation eases, many families live paycheck to paycheck with little or no financial safety net. Without savings, they are vulnerable to unexpected costs driven by global trade shifts or tariff changes, which can quickly raise prices on basic goods and services.

This is more than an economic problem—it's a societal one. Persistent cost pressures shape political priorities and deeply influence millions of daily decisions. Higher prices for fresh produce will limit consumers' ability to eat nutritious food. This lack of spending power also undermines economic growth and hampers the green and digital transitions Europe needs.

Empowering consumers is therefore vital to shaping markets and driving growth toward a sustainable, digital, and affordable future.

Recommendations

- Prioritise **affordable sustainable options across all EU policies and initiatives in the 2025–2030 term**, ensuring that sustainable choices become accessible and affordable for all consumers.
- Ensure sound **competition** in the EU internal market and competitive global markets and trade.

Single Market Constraints⁵

Territorial Supply Constraints (TSC)

Examples of Territorial Supply Constraints (TSCs) are common throughout the EU, particularly in Belgium, according to the experiences of Euroconsumers' organisation Testaankoop/Testachats. Testaankoop/Testachats' work has highlighted how TSCs prevent Belgian consumers from accessing goods or services on equal terms with those in other EU countries. Suppliers may refuse to sell, apply different prices, or restrict product availability based on the buyer's location. This affects both individuals and businesses, particularly in sectors like retail, beverages, or media. For Belgian consumers, TSCs result in higher prices (according to one estimate, they pay a surplus of 3%), reduced choice, and barriers to cross-border purchases, undermining the EU's single market principles.

Geo-Blocking

Despite EU rules against geo-blocking, TSCs persist through indirect practices like exclusive distribution agreements. Testaankoop/Testachats has found that consumers

⁵ **Euroconsumers (2024)**, *Euroconsumers' response to the Commission's call for evidence on the Single Market Strategy 2025*, <https://www.euroconsumers.org/wp-content/uploads/2025/01/single-market-strategy-consultation.pdf>

frequently experience issues when trying to order products from non-Belgian EU-wide webshops. When trying to order something from a Belgian webshop, consumers may be told the product is out of stock; however, on a non-Belgian equivalent webshop, the product is still available. In many cases, consumers are unable to enter a Belgian delivery address when trying to purchase the item, effectively preventing them from buying the product.

In addition, exemptions to geo-blocking rules still exist for certain sectors such as audiovisual services, including streaming platforms. Several EU-based media platforms restrict subscriptions or access based on the user's country of residence, despite the EU's digital single market goals. Public broadcasters like ARD, RTBF, and France.tv often require local residency due to licensing agreements. Platforms such as Viaplay and Sky operate separately across countries, blocking subscriptions from outside their target markets. The EU's Portability Regulation allows temporary access abroad for existing subscribers but doesn't mandate cross-border subscription rights.

In contrast, global services like Netflix, Disney+, and Spotify offer more flexibility across the EU, though content libraries may differ by country. Licensing remains the main barrier to full access.

Financial sector

In the financial services sector, many barriers to the single market still exist. It is often difficult, if not impossible, for a European citizen to open a bank account, take out a loan, or purchase an insurance policy (life or non-life) in another EU country. Testaankoop/Testachats has found that specific fiscal and regulatory conditions in Belgium make it difficult for foreign banks to offer attractive savings accounts to Belgian consumers.⁶ In Spain, OCU has found that the benefits offered by the Italian branch of the Spanish bank BBVA were more advantageous than those offered in Spain. Yet opening a bank account in Italy without an Italian passport appeared impossible, meaning Spanish consumers were losing out.⁷ In Italy, Altroconsumo, found that the same restrictions were in place for Italian consumers trying to open an account in Spain with the Spanish bank Santander. In this case, a geo-blocking system prevented citizens from another country from applying to open an account online.

Recommendations

- **Guarantee equal access for all EU consumers to goods, services, and digital content**

⁶ **Test Achats (2024)**, *Les intérêts des comptes d'épargne seront-ils bientôt davantage taxés*. <https://www.testachats.be/invest/fiscaliteetdroits/taxation/news/2024/12/interetepargnetaxe>

⁷ **OCU – Organización de Consumidores y Usuarios (2024)**, *Discriminación financiera: BBVA ofrece peores condiciones a usuarios españoles que a otros usuarios europeos*. <https://www.ocu.org/organizacion/prensa/notas-de-prensa/2024/discriminacionfinanciera300124>

by eliminating territorial supply constraints, closing geo-blocking loopholes, and harmonising cross-border financial service rules.

2. Fraud and Scams: A Strategic Threat to Consumer Trust and Europe's Economy

Fraud and scams are a fast-evolving threat to Europe's consumers and the wider economy. This is not just a consumer protection issue, but a major structural challenge for the EU. Each year, billions of euros are siphoned from consumers and businesses through fraudulent schemes. These are funds that could otherwise support innovation, social inclusion, and investment in the green and digital transitions. Euroconsumers' extensive work in this area highlights both the scale of consumer harm and the urgent need for structural solutions.

These crimes do not operate in isolation: they move fluidly across digital platforms, payment systems, and communication channels. Without coordinated EU-level action across the entire scam chain, the scale and sophistication of online fraud will only increase. The cost of this will continue to rise, not only for individual victims, but for the European economy as a whole.

Consumers are aware of the risks. Our survey found that 74% consumers believe that tackling online financial scams should be a top priority for this legislative term.⁸ This is no surprise when you consider that many have a personal experience with these crimes: 4 out of 5 respondents in our [cybersecurity survey report](#) having encountered a scam online.⁹

The emotional and financial impacts are often severe, with some experiencing long-term distress and insecurity. Despite this, victim support remains patchy or absent in many countries. Our survey found that just over half of the victims surveyed did not seek help, with over 1 in 5 saying they didn't think anything could be done. 25% of cases reported to the police were closed without follow-up, and one in five victims received no response at all.¹⁰

We've consistently called for stronger enforcement and better victim support. At the 2024 and 2025 Global Anti-Scam Summits, we stressed the need for long-term assistance to those affected, not just reactive responses.¹¹ Our work has documented the trauma and

⁸ **Euroconsumers (2024)**, *EU Election Fever: Taking consumers' temperature*. <https://www.euroconsumers.org/wp-content/uploads/2024/05/Euroconsumers-Election-Survey-report.pdf>

⁹ **Euroconsumers (2024)**, *Caught in the web: Navigating the digital maze of scams*. <https://www.euroconsumers.org/wp-content/uploads/2024/12/Caught-in-the-web-Navigating-the-digital-maze-of-scams.pdf>

¹⁰ *ibid*

¹¹ **Euroconsumers (2024)**, *Online scams: caring for consumers when the worst happens*. <https://www.euroconsumers.org/online-scams-caring-for-consumers-aftermath/>; **Euroconsumers (2024)**, *Global Anti Scam Summit: urgent action needed to support scam victims for the long haul*. <https://www.euroconsumers.org/global-anti-scam-summit-urgent-action-needed-to-support-scam-victims-for-the-long-haul/>

vulnerability experienced by scam victims and the lack of follow-up services to support recovery. Together with the Global Anti-Scam Alliance, we issued a joint call for the establishment of national fraud hotlines to provide a centralised point of contact for scam victims.¹²

The scale of the threat is compounded by a lack of accountability across the scam chain. Creating a centralised contact point could also help facilitate coordination across all stakeholders. Fraudsters depend on a whole network of digital platforms that host fake ads, communication networks that enable impersonation, and payment systems that process fraudulent transactions. Our complaint with our Italian member, Altroconsumo, against Booking.com, is just one example of how all digital players need to step up to combat recurring scam incidents on their platforms.¹³ To address this, we need more transparency and accountability. Scam facilitation cannot be dismissed as the price of doing business online. This is the attitude of the Italian communications regulator, AGCOM, which ordered telcos to use an anti-spoofing filter to stop the growing number of fake calls reaching consumers' phones.¹⁴

Our organisations are already working tirelessly to improve consumer awareness on this issue,¹⁵ but addressing this challenge requires more than educational campaigns. The EU needs a coordinated strategy that includes robust enforcement, shared responsibilities across intermediaries, and accessible support services for victims. The fight against fraud must be seen as integral to Europe's economic resilience and digital competitiveness, not as an afterthought.

Recommendations

- **Make frauds and scams a strategic priority** in the new Consumer Agenda, with a dedicated policy stream and measurable objectives that cut across digital, financial, and consumer protection policy.
- Ensure the **upcoming Action Plan on Online Fraud** includes:

¹² **Euroconsumers (2024)**, *Scam victims need backup: Euroconsumers and GASA call for national fraud hotlines*. <https://www.euroconsumers.org/wp-content/uploads/2024/12/Scam-victims-need-backup-Euroconsumers-and-GASA-call-for-national-fraud-hotlines-.pdf>

¹³ **Altroconsumo (2025)**, *Prenotazioni su Booking.com: occhio alla truffa del sito clone*, 11 June 2025. <https://www.altroconsumo.it/vita-privata-famiglia/viaggi-tempo-libero/news/truffa-sito-booking-clone> See also: **Euroconsumers (2025)**, *Form fraud is rife on booking.com: your scam stories can help to stop crime*. <https://www.euroconsumers.org/fraud-booking-com-share-scam-stories/>

¹⁴ **Altroconsumo (2025)**, *Spoofing telefonico, ecco il filtro Agcom contro le chiamate truffa*. <https://www.altroconsumo.it/hi-tech/internet-telefono/news/agcom-telefonate-truffa>

¹⁵ See: **OCU – Organización de Consumidores y Usuarios (2024)**, *Postura OCU: fraudes online*. <https://www.ocu.org/info/postura-ocu-fraude-online>; **Test Achats (2023)**, *Oplichterij via internet: bescherm jezelf*. <https://www.test-aankoop.be/familie-privé/webshops/dossier/oplichterij-via-internet>; **Altroconsumo (2020)**, *Phishing: 8 consigli per stare tranquilli*. <https://www.altroconsumo.it/hi-tech/antivirus/consigli/phishing-8-consigli-per-stare-tranquilli>; **DECO PROteste (2024)**, *Phishing: o que é e como se deve proteger*. <https://www.deco.proteste.pt/dinheiro/contas-ordem/dicas/phishing-que-e-como-se-deve-proteger>

- Clarification on the **obligations and liabilities of the different stakeholders** across the scam chain, including proactive detection, scam takedown obligations, and escalation processes
- Coordination of **victim assistance and redress frameworks** across Member States
- Stronger **cross-border enforcement cooperation** and data sharing capabilities
- Funding for **targeted public awareness and scam resilience campaigns**, with a special focus on vulnerable groups, including the elderly and young people
- **Integrates scam prevention into broader Single Market and SME strategies**, recognising the **distortionary impact** of unchecked fraud on competition, innovation, and digital participation.
- **Strengthen enforcement of the EU's digital rulebook**, including:
 - **Effective implementation of the GDPR, Digital Services Act, Digital Markets Act, AI Act**, and (once adopted) the **Payment Services Regulation**
 - **Introduce additional anti-fraud obligations and liability measures** for online platforms, search engines, and electronic communication providers if existing measures prove insufficient to deter or prevent online fraud
- Ensure that **regulatory enforcement bodies are adequately resourced and coordinated**
- Consider **concrete, targeted actions to help protect consumers**, such as:
 - Strengthening customer identification through KYC protocols.
 - Encourage real-time detection and blocking of suspicious transactions.
 - Efficient Identification and takedown of fraudulent or scam websites.
 - Greater user control to block payments or set account and time limits.
 - Immediate compensation for consumers deceived into making fraudulent payments.
 - Shifting the burden of proof for payment authorisation onto the banks, not the consumer.

3. Digital

E-commerce: Unsafe Products and Gaps in Enforcement¹⁶

E-commerce has brought consumers more choice, better prices, and unprecedented convenience. Online shopping is now second nature for many consumers, but with convenience comes some risk. Shoppers can lose money to misleading deals or, worse, be exposed to unsafe and sometimes dangerous products. And these risks don't just come from obscure or non-European sellers. Tests by Euroconsumers' members show that dangerous goods can just as easily come from within the EU.

In Belgium, Testaankoop/Testachats found that 8 of 40 costume jewellery pieces sold on

¹⁶ OCU – Organización de Consumidores y Usuarios, Comercio electrónico. Postura OCU. <https://www.ocu.org/info/postura-ocu-comercio-electronico>

platforms like Amazon, Bol.com, Wish and Aliexpress did not meet EU safety standards.¹⁷ In Spain, 8 of 9 carbon monoxide detectors tested by OCU failed to detect harmful levels of the gas.¹⁸ OCU's work highlighted a major loophole in the existing legislation, as identical, unsafe devices were sold under different brand names. However, when one is withdrawn from the market, there's no mechanism under the current rules to track and remove its duplicates.

Our Italian member, Altroconsumo uncovered serious safety concerns weight-loss supplements purchased from popular online marketplaces.¹⁹ Most of the products tested, which were manufactured both in and outside the EU, failed to meet labelling requirements and several had serious safety concerns. Testaankoop/Testachats raised similar concerns with 58 products available for delivery in Belgium.²⁰ OCU had similar results in their tests and referred 11 products to the Spanish Agency for Food Safety and Nutrition (AESAN).²¹

These gaps in enforcement undermine trust and tilt the playing field. To counter these risks, Euroconsumers has worked with online marketplaces through the voluntary Product Safety Pledge Pilot. By flagging unsafe items found in our tests we've helped reduce takedown times from 4–6 days to 1–2. However, similar products often resurface quickly, underscoring the need for continued and reinforced efforts on all fronts and by all actors in the e-commerce value chain, including marketplaces. This is key to protect consumers and give responsible businesses a fair chance to compete.

Recommendations

- Improving the complaint process against sellers on marketplaces. We propose that platforms act as a **single point of contact for complaints**, providing a clear interlocutor for consumers.
- Platforms should be required to clearly display product origin, supplier contact details and return conditions to help combat **dropshipping**. Platforms using this model must assume responsibility towards consumers.
- Enhancing consumer awareness of the environmental and social cost of dropshipping, as well as the limited consumer rights. Helping consumers detect misleading

¹⁷ **Test Aankoop (2023)**, *Zware metalen in goedkope juwelen – Fantasiejuwelen onveilig voor de gezondheid*. <https://www.test-aankoop.be/gezond/dagelijkse-verzorging/vervuiling/nieuws/fantasiejuwelen-ongezond>

¹⁸ **Euroconsumers (2024)**, *Unsafe carbon monoxide detectors on sale: New EU product safety rules have come just in time*. <https://www.euroconsumers.org/unsafe-carbon-monoxide-detectors-on-sale-new-product-safety-rules-have-come-just-in-time/>

¹⁹ **Altroconsumo (2025)**, *Integratori dimagranti venduti online: cinque prodotti da evitare*, <https://www.altroconsumo.it/alimentazione/dimagrire/news/inchiesta-dimagranti>

²⁰ **Test Achats (2025)**, *Les compléments alimentaires pour maigrir vendus en ligne sont-ils dangereux* <https://www.test-achats.be/sante/alimentation-et-nutrition/complements-alimentaires/news/complements-amaigrissants-vendus-sur-internet#conclusion-les-autorites-doivent-agir>

²¹ **OCU – Organización de Consumidores y Usuarios (2025)**, *La OCU denuncia a AESAN hasta 11 complementos adelgazantes por irregularidades* <https://www.ocu.org/organizacion/prensa/notas-de-prensa/2025/complementosadelgazantes270325>

information of dropshipper on the origin of their products.

- Enhancing the collaboration within the CPC network to crack down dropship websites that mislead consumers and penalize platforms that fail to meet their responsibility to exclude dropshippers.
- Enforcing **stricter penalties** for fake promotions, particularly around events like Black Friday, including mandatory reimbursement of overcharged amounts.

Influencer Marketing: Hidden Ads and Weak Accountability

E-commerce has expanded into social media, where influencers blur the line between content and commerce. The relationship between influencers²² and consumers is built on perceived proximity, authenticity, and trust. These qualities amplify their impact, especially on minors, who are more vulnerable to hidden advertising that may affect their physical, emotional, or psychological development. But when promoted products turn out to be unsafe, misleading, or even scams, consumers are left with limited protection. Who is responsible?

Euroconsumers has repeatedly flagged these gaps. Already in 2022, we explored influencer marketing risks and explored how we can improve the situation through a combination of enforcement of already existing law and clearer regulation on, i.e. the role of platforms, disclosure standards or joint liability.²³ Testaankoop/Testachats and Altroconsumo documented widespread hidden promotions of dietary supplements and weight loss drugs on social media²⁴. Despite filing complaints, misleading influencer content remains widespread, including for potentially harmful products. Altroconsumo has also reported several influencers promoting cryptocurrencies and other highly risky investments to the Italian Antitrust Authority.²⁵

These cases reveal the limits of enforcement. While misleading advertising is banned under EU law, enforcement struggles to keep up with fast-moving, cross-border content. Platforms often fail to act. This leaves consumers exposed and undermines trust in digital markets.

Influencer marketing is here to stay, but it must become safer. The next EU Consumer Agenda should strengthen enforcement powers at EU level and remove barriers to

²² **OCU – Organización de Consumidores y Usuarios (2024)**, *Postura OCU: los influencers*, <https://www.ocu.org/info/postura-ocu-influencers> (ocu.org); **Test Aankoop (2024)**, *Hoe kun je influencer marketing herkennen?*, <https://www.test-aankoop.be/familie-privé/consumentenrechten/antwoord-van-expert/influencer-marketing-beinvloedt-onze-aankopen>; **Test Aankoop (2024)**, *Waarom food influencers gevaarlijk zijn voor (jonge) volgers*, <https://www.test-aankoop.be/gezond/dagelijkse-verzorging/welzijn/dossier/gevaren-van-food-influencers>

²³ **Euroconsumers (2022)**, *The influencer economy: is the social media salesforce taking over?*, <https://www.youtube.com/watch?v=7AsZQmpLDOo>

²⁴ **Testaankoop/Testachats (2023)**, *La pénurie d'Ozempic est principalement la faute de son fabricant Novo Nordisk*, <https://www.test-achats.be/sante/maladies-et-medicaments/medicaments/presse/penurie-ozempic>

²⁵ **Altroconsumo (2024)**, *Criptovalute: influencer sotto la lente di Antitrust*, <https://www.altroconsumo.it/vita-privata-famiglia/servizi-e-contratti/news/influencer-criptovalute-antitrust>

coordinated cross-border action. Social commerce should not be a regulatory blind spot. Consumers deserve transparency and protection, no matter the channel.

Recommendations²⁶

- Explore the development of a **specific EU-wide legal framework** that defines the rights and obligations of influencers, advertisers, and platforms, including joint liability between the influencer and their brands
- Ensure that all commercial communications are **clearly identifiable**, especially when targeting children.

Regulatory Gaps in the Digital Space

One of the clearest examples of regulatory blind spots is the growing use of **dynamic pricing** — the practice of adjusting prices in real time based on consumer demand. While common in sectors like travel, events, and e-commerce, the lack of transparency around how prices are set can easily cross the line into manipulation. Consumers may not realise they are being shown a different price than others for the same product, or that urgency cues are being artificially inflated to trigger purchases. Euroconsumers' 2024 paper "Definitely! Maybe?" underscores how dynamic pricing, when poorly regulated, risks undermining fairness and trust in digital markets.²⁷ Our work highlights how EU legislation was not designed for today's algorithmically driven marketplaces, meaning consumers are easily caught out. Euroconsumers and its members have been raising awareness on abuses linked to dynamic pricing.²⁸ Most recently, we wrote to FIFA regarding the use of dynamic pricing for the 2026 World Cup.²⁹

Similarly, **fake reviews** continue to distort consumer choice and online competition, despite EU rules. While platforms and marketplaces are now required to verify and remove fake reviews, enforcement remains limited, and consumer trust continues to suffer.

Euroconsumers' members have repeatedly exposed the scale of the problem. In a major screening exercise, OCU analysed nearly 6.5 million online reviews of 50,000 commercial products and services across Amazon, TripAdvisor, and Booking.com. OCU reported their

²⁶ See also **BEUC (2023)**, *From influence to responsibility: Time to regulate influencer marketing*, https://www.beuc.eu/sites/default/files/publications/BEUC-X-2023-093_From_influence_to_responsibility_Time_to_regulate_influencer-marketing.pdf

²⁷ **Euroconsumers (2024)**, *Dynamic Pricing: Definitely! Maybe? Navigating the curious case of dynamic pricing*, <https://www.euroconsumers.org/wp-content/uploads/2024/11/Dynamic-Pricing-Definitely-Maybe.pdf>

²⁸ **Test Achats (2025)**, *Nous portons plainte contre Ticketmaster pour ses "Platinum Tickets" trompeurs*, 4 July 2025, <https://www.test-achats.be/famille-prive/droits-des-consommateurs/news/ticketmaster-1>

²⁹ **Euroconsumers (2025)**, *Concerns and Request for Clarification on the Use of Dynamic Pricing for World Cup Tickets (letter to FIFA)*, Brussels, 10 July 2025, https://www.euroconsumers.org/wp-content/uploads/2025/07/Dynamic-Pricing_FIFA-letter.pdf

findings to the Spanish authority, but no action has followed. Meanwhile, Altroconsumo uncovered an entire ecosystem of “fake review harvesters”, including websites, Telegram channels, and Facebook groups, connecting sellers with users willing to leave fake reviews in exchange for money or goods. Despite filing criminal proceedings in several cities, most cases were dropped or stalled.³⁰

Fake reviews are not a trivial nuisance. They push consumers toward lower-quality products and services, undermining the Single Market and resulting in real economic and welfare losses. The EU must take more ambitious steps to enforce its existing laws and close loopholes that continue to allow review manipulation to flourish.

Recommendations

- Conduct an **economic analysis on the impact of dynamic pricing** for consumers across different market sectors
- Ensure proper **enforcement** of existing legislation and a targeted **clarification/reinforcement of consumer law** to ensure a transparent and fair functioning of dynamic pricing.
- **Prohibit** the use of **dynamic pricing for live entertainment** events where market failure prevents a fair and well-functioning dynamic pricing system
- **Clearly display final prices** from the outset to prevent "**drip pricing**." Market surveillance must be strengthened to initiate sanctions against companies using such misleading tactics.
- **Combat fake reviews**, which should be a priority for enforcement authorities coordinated at EU level. Platforms should be required to verify reviews and remove products influenced by misleading ratings.

Digital Minors

Young people today have the unique experience of growing up with the digital world. We are only just beginning to understand the impact of the online with the offline reality. For example, OCU's study found that excessive screen time impacted grades, sleep and even moods.³¹ Altroconsumo's study also found that the virtual life of adolescents largely escapes adults.³²

While digitalisation brings many benefits, it also poses serious challenges: cyberbullying, harmful content exposure, and privacy concerns. More often, minors are being

³⁰ **Euroconsumers (2023)**, *Enforcers are failing consumers on fake reviews*, 28 June 2023. <https://www.euroconsumers.org/enforcers-are-failing-consumers-on-fake-reviews/>

³¹ **OCU – Organización de Consumidores y Usuarios (2023)**, *Adolescentes online: nativos en un mundo salvaje*. <https://www.ocu.org/tecnologia/internet-telefonía/informe/encuesta-adolescentes-online>

³² **Altroconsumo (2023)**, *Adolescenti online: quello che dicono e quello che i genitori fanno*. <https://www.altroconsumo.it/hi-tech/internet-telefono/news/adolescenti-online>

manipulated by misleading online practices. We regularly hear from consumers who received credit bills for in-game purchases made by ignorant minors. The complex nature of the digital space, with hidden influencer marketing and addictive design in games, makes it all the more challenging for minors to navigate.

We welcome the increased attention on the topic of minor protection; however, we encourage the Commission to consider the opinions of minors when considering any policy solution. While minors are currently the focus of many heated debates, they are often overlooked when discussing solutions. Euroconsumers is currently running an in-depth survey in Belgium, Italy, Spain, Portugal, and Poland, targeting minors directly.

The aim is to develop a detailed overview of their behaviour and experiences, but even more of what they need to be fully protected and empowered in the digital reality. It is our goal to elevate their voice and increase the success rate of possible tools and solutions. With results expected for late September, Euroconsumers will use these results to propose concrete recommendations in the upcoming Digital Fairness Act public consultation.

4. Sustainability

Inaccessible and unaffordable sustainable choices

While consumers overwhelmingly care about sustainability, too often they are unable to act on their intentions. Euroconsumers' election survey revealed that 45% of consumers are deeply concerned about climate change, and 65% believe EU policies must support a green transition.³³ Importantly, a later survey found that 83% of consumers say they have already changed habits to combat climate change, demonstrating a strong willingness to act.³⁴ However, systemic barriers continue to hinder further progress.

Affordability is one of the biggest obstacles. Consumers are not indifferent; they are constrained. According to Euroconsumers' research³⁵:

- 62% say it is too costly to further change their habits;
- 50% lack the financial support to do so;
- 30% feel the benefits of adopting more sustainable habits don't outweigh the cost.

These findings highlight that Affordable Sustainability must become a pillar of the next Consumer Agenda. Price gaps between standard and sustainable options, from food to mobility to home appliances, are deterring even willing consumers.

³³ **Euroconsumers (2024)**, *EU Election Fever: Taking consumers' temperature*, May 2024. <https://www.euroconsumers.org/wp-content/uploads/2024/05/Euroconsumers-Election-Survey-report.pdf>

³⁴ **Euroconsumers (2025)**, *World Consumer Rights Day 2025: Consumers want affordable sustainability*, March 2025. <https://www.euroconsumers.org/wp-content/uploads/2025/03/World-Consumer-Rights-Day.pdf>

³⁵ *ibid*

Information is key to empowerment. Through the EPREL Services Project, in which all Euroconsumers members participated, 2,500 consumers across 10 EU countries were surveyed. The results were clear: when buying major appliances, energy consumption and efficiency are the top decision drivers, on par with purchase price and running costs. Consumers want relevant, accessible, and comparable data.³⁶

Initiatives like the Digital Product Passport offer promise, especially to improve transparency, market access, and multilingual availability. But success depends on consumer-friendly design, with:

- Clear priorities on which information must remain on physical packaging;
- A simplified, intuitive presentation of complex environmental data online.

However, correct information can only have a truly effective effect if we also work with those who produce goods and services and then offer them on the market. In Italy, Altroconsumo has launched a platforming collaboration with producers and retailers, dedicated to informing consumers. All industries must consider their production models to adapt to new consumer needs for more sustainable consumption.³⁷ Without addressing these systemic affordability and accessibility barriers, consumer intentions will continue to be undermined by market realities. The 2025–2030 Consumer Agenda must therefore focus not just on promoting sustainable options, but on making them truly reachable for all.

Recommendations

- Integrate **affordability** into any future green policies. Affordable sustainability must become a guiding legislative principle in order to ensure we have everyone on board for the green transition.
- Closely **monitor the roll-out of the Digital Product Passport** to ensure it reflects consumers' priorities.
- Develop a **comprehensive EU sustainability index** that rates the environmental, social and economic impact of products, including durability, animal welfare, proximity, seasonality, and corporate responsibility.
- Support market **uptake of all trustworthy sustainability labels**, including private ones and the ones from consumer organisations, to protect consumers against greenwashing.
- Ensure that sustainability information is **accessible** to persons with disabilities and those without digital access.
- Encourage Member States to implement **economic and tax incentives** for sustainable products and for to have the products repaired thus extending their life cycle as much as possible.

³⁶ **Euroconsumers (2025)**, *EPREL Survey: Strong demand for smarter energy labels*, June 2025. <https://www.euroconsumers.org/eprel-survey-strong-demand-for-smarter-energy-labels/>

³⁷ Altroconsumo, <https://www.impegnatiacambiare.org>.

- Encourage cooperation between consumer organisations and the world of production and commerce to implement a new, more sustainable economic model.

Improving product circularity:

Circularity is key to delivering sustainable consumption and reducing environmental impact, while offering consumers affordable, durable alternatives. But to make circularity work, consumers need access to trustworthy, long-lasting products that are easy to maintain, repair, and reuse.

Refurbished products are a central pillar. Euroconsumers' 2025 report "How Good is As Good as New?" found that more than half of consumers are open to buying refurbished goods, particularly electronics. Affordability is the main driver, but concerns persist over product quality, warranty coverage, and transparency.³⁸

Ultimately, circularity must be built into the DNA of the Single Market, backed by regulation and made real for consumers via practical tools and affordable access. By aligning innovation with consumer protection, the EU can make circularity not only an environmental imperative but a mainstream market norm.

Recommendations

- A common **EU-wide definition for refurbished goods**, covered by a legal guarantee of at least two years
- EU-wide **standards for the use of descriptive ranking categories** like 'as good as new';
- **Information requirements on repairs and any parts used** during the process, along with the **identification of the refurbisher**, to be provided to the consumers both at the point of sale;
- **Advance eco-design requirements** to cover more product categories, to ensure consumers can access their right to repair;
- Beyond refurbishment, the next Consumer Agenda must **promote a broader shift toward circular design and informed purchasing**.
- **Promote the right to repair**, by ensuring:
 - Long-term **availability of spare parts**;
 - **Fair pricing** for repairs;
 - **Clear obligations** for manufacturers to support independent repairers.
- Expand the ban on the destruction of clothes and shoes of *New Ecodesign for Sustainable Products Regulation* to non-food items like tobacco, electrical appliances, hygiene products and cosmetics, as France has decreed.

³⁸ **Euroconsumers (2025)**, *How Good is As Good as New? Making the case for empowered consumers in an improved refurbished goods market*. <https://www.euroconsumers.org/wp-content/uploads/2025/01/How-good-is-as-good-as-new.pdf>; **See also** <https://www.ocu.org/info/postura-productos-reacondicionados>

Tackle Software-Induced Obsolescence

Despite progress on physical durability, software-induced obsolescence remains a significant barrier for consumers and the circular economy. When devices remain physically functional but lose software support, consumers face forced upgrades or unsafe usage.

Euroconsumers' 2025 report "How Good is As Good as New?" highlights that software updates and compatibility concerns are a major barrier to purchasing refurbished products.³⁹ This undermines the circular economy and leads to unnecessary waste.

A clear example is Microsoft's upcoming end of free security support for Windows 10 in October 2025. While the devices themselves remain fully functional, they will become vulnerable without regular updates. For many users—particularly those with older hardware from 2017 or earlier that cannot upgrade to Windows 11—this effectively forces premature replacement. A recent Euroconsumers survey shows that 22% of consumers still use such devices.⁴⁰ However, without essential security updates or affordable alternatives, these products are rendered unsafe or obsolete by design.

This means that millions of individual users across the globe will be forced to throw away their old devices and buy new ones. It also directly impacts sustainable consumption models, as consumers are forced to buy newer products to ensure they are protected. Ending security updates for viable devices erodes trust and turns software policy into a driver of e-waste, at a time when we urgently need longer-lasting products.

Euroconsumers raised these concerns in an open letter to Microsoft, calling on the company to reconsider its approach and provide longer-term, accessible support options.⁴¹ While the negative impact on both consumers and the environment is clear, premature software obsolescence is not strictly illegal under the current legislation.

Euroconsumers is concerned with what we view as a shift towards software-induced obsolescence as a business strategy. By limiting the lifespan of digital products, companies can force consumers to upgrade their devices, long before they may have planned to do so themselves.

Addressing software-induced obsolescence is vital to extend product life, reduce waste, and support consumers' right to choose sustainable, circular products.

³⁹ *ibid*

⁴⁰ **Euroconsumers (2025)**, *Euroconsumers calls out Microsoft for planned obsolescence as it limits Windows 10 support*. <https://www.euroconsumers.org/microsoft-security-windows-10-planned-obsolence/>

⁴¹ **Euroconsumers (2025)**, *Open letter to Microsoft regarding planned end of Windows 10 security support*. <https://www.euroconsumers.org/wp-content/uploads/2025/07/Letter-to-Windows.pdf>

Recommendations

- **Ensure proper transposition and enforcement** of recently adopted consumer laws that promote sustainable consumption, including the **Directive on Empowering Consumers for the Green Transition**.
- **Mandate minimum software and security support periods** for digital products that allow to extend the lifespan and facilitate circularity.
- **Ban restrictive software practices** that block repair, resale, or reuse, such as update-induced slowdowns or digital locks.

Water Management

Saving water is becoming increasingly critical as Europe faces more frequent and prolonged droughts. In Portugal last year, 31% of the mainland territory experienced severe drought, while Spain and Italy have also faced water scarcity.⁴² The EU's Water Resilience Initiative rightly stresses the need to reduce water stress and improve efficiency, but this cannot be done without involving consumers.

Euroconsumers' research shows consumers are ready to do their part: 84% of respondents said they are already taking action to save water.⁴³ Yet many face barriers: 58% need more information, and 67% ask for concrete tools. Our member organisations across Spain, Italy, Belgium, and Portugal have stepped up, sharing ways to save water at home without buying new products or by testing the latest water-saving devices on the market.⁴⁴

But while individual actions matter, consumers cannot carry the burden alone. Sustainable water management also requires structural action from policymakers, industry and enforcement authorities. Authorities must invest in long-term infrastructure and planning, and producers must be more transparent about water use throughout their production and supply chains. Labels showing the water footprint of products, backed by verifiable data, could help consumers make more sustainable choices.

At the same time, access to clean, safe water is non-negotiable. A recent Testaankoop/Testachats investigation found that while tap water is drinkable for now, traces of pesticides and TFAs could change this in the future. Even at low doses, these

⁴² **Joint Research Centre (2024)**, *Prolonged drought and record temperatures have critical impact in the Mediterranean*. https://joint-research-centre.ec.europa.eu/jrc-news-and-updates/prolonged-drought-and-record-temperatures-have-critical-impact-mediterranean-2024-02-20_en

⁴³ **Euroconsumers. (2025, March)**. *World Consumer Rights Day 2025: Consumers Want Affordable Sustainability*. <https://www.euroconsumers.org/wp-content/uploads/2025/03/World-Consumer-Rights-Day.pdf>

⁴⁴ **OCU – Organización de Consumidores y Usuarios (2024)**, *Reductores de caudal para ahorrar agua*. <https://www.ocu.org/vivienda-y-energia/equipamiento-hogar/consejos/reductores-de-caudal-para-ahorrar-agua> ; **Altroconsumo (2024)**, *Trucchi per non sprecare e risparmiare acqua in casa*. <https://www.altroconsumo.it/alimentazione/acqua/consigli/non-sprecare-acqua-in-casa> **DECO PROteste (2025)**, *Como poupar água em casa: truques*. <https://www.deco.proteste.pt/sustentabilidade/artigo/como-poupar-agua-em-casa>

residues raise questions about long-term exposure. Consumers deserve clear information and high-quality water, now and in the future.⁴⁵ A similar situation exists in Italy, where two recent Altroconsumo investigations found TFAs in water bottles⁴⁶ and in tap water⁴⁷.

Euroconsumers and its members will continue to empower consumers, but we will also push for the systemic reforms needed to make the water market more transparent, fair, and resilient.

Recommendations

- Support **rigorous product testing and labelling for water-saving devices**, ensuring consumers can identify effective and comfortable options.
- Require companies to **clearly label the amount of water used** to produce consumer goods, so that consumers can make informed choices and producers are encouraged to adopt more sustainable practices.
- Change the rules regarding the presence of **PFAS and TFA**, always keeping public safety in mind. If there are any concerns about the danger, the rules must protect citizens first.

Enforcement

Public enforcement

Several shortcomings and challenges can be identified when it comes to an effective public enforcement of consumer rights⁴⁸.

In particular:

Lengthy procedures: the procedures for coordinated enforcement actions are often too long and cumbersome, making them not ideal for fast-evolving (digital) markets. In Belgium for example, Euroconsumers' member Testaankoop/Testachats asked their authority back in July 2024 to act upon FTI, a travel agency that went bankrupt but whose insurer refuses to reimburse Belgian customers. So far, no action has been taken. A complaint filed in September 2024 against some music festivals for not respecting consumer rights equally remains unresponsive. And despite multiple alerts with regards to misleading price reductions, especially during sales periods, the wrongful application of the reference price

⁴⁵ **Test Achats (2025)**, *Analyse des eaux en bouteille*. <https://www.test-achats.be/sante/alimentation-et-nutrition/eau/presse/analyse-eaux>

⁴⁶ **Altroconsumo (2025)**, *Test sull'acqua minerale in bottiglia: alcune marche bocciate per presenza di Pfas*. <https://www.altroconsumo.it/alimentazione/acqua-in-bottiglia/news/test-acqua>

⁴⁷ **Altroconsumo (2025)**, *TFA (Pfas) nell'acqua potabile: superiore ai limiti in quattro campioni su quindici*. <https://www.altroconsumo.it/alimentazione/acqua/news/tfa-acqua-potabile>

⁴⁸ See, i.e., the outcomes of the report from the European Commission evaluating the application of Regulation (EU) 2017/2394, which governs cooperation among national authorities for the enforcement of consumer protection laws (CPC).

remains a common practice.

Lack of deterrence from fines: the deterrent effect is limited because penalties have not been applied in a coordinated manner. Moreover, the maximum penalties provided by national legal systems are sometimes so derisory in the case of large players that they are not dissuasive enough. For example, the maximum financial penalty in Italy, where our member Altroconsumo operates, for an unfair commercial practice is €10 million.

Inconsistencies in national capacities and application: differences in national enforcement capacities, limited resources and varying interpretations of the regulation and consumer rules hinder consistent enforcement. Some national authorities appear to be more active, while others show a very low level of responsiveness, which essentially renders the watchdog activities of local consumer and civil society organisations useless. Sometimes, differences in interpretation occur within the same authority.

For example, back in 2023, when Euroconsumers/Altroconsumo submitted a report to the Italian Antitrust Authority regarding the original version of Bing Chat, which for the first time integrated artificial intelligence into its search engine, generating a series of 'hallucinations' with misleading purchasing advice for consumers and without any disclaimer (which was then introduced months later), the Authority closed the case, deeming the consumer relationship non-existent and, therefore, the discipline of unfair commercial practices not applicable.⁴⁹ Two years later, the Authority has opened a procedure against Deepseek for exactly the same reasons that we reported two years ago.⁵⁰ This confirms that the legislation (both European and national) on unfair commercial practices is 'future-proof,' but its interpretation is often not consistent.

Inadequate digital enforcement skills: authorities may not have the necessary capacities and skills, such as IT and AI experts, to detect and address new types of infringements in the digital environment.

Recommendations⁵¹

Based on these findings, a proposal for better public enforcement should focus on the following key areas:

- **Enhance the deterrent effect of enforcement actions by:**
 - **Empowering the European Commission:** Grant the European Commission a stronger and clearer mandate to directly address EU-wide infringements,

⁴⁹ **Euroconsumers (2023)**, *The misleading maze of Bing Chat*. <https://www.euroconsumers.org/the-misleading-maze-of-bing-chat/>

⁵⁰ **Autorità Garante della Concorrenza e del Mercato (AGCM) (2025)**, *Bollettino n. 23/2025, 18 June 2025*. <https://www.agcm.it/dotcmsdoc/bollettini/2025/23-25.pdf>

⁵¹ See also **BEUC (2022)**, *Strengthening the coordinated enforcement of consumer protection rules: The revision of the Consumer Protection Coordination (CPC) Regulation*, https://www.beuc.eu/sites/default/files/publications/BEUC-X-2022-135_Strengthening_the_coordinated_enforcement_of_consumer_protection_rules.pdf

including the explicit power to impose fines. This would provide a more centralised and impactful deterrent.

- **Imposing coordinated fines:** To address the limited deterrent effect, a stronger emphasis should be placed on coordinating the imposition of penalties and fines.
- **Increasing communication about CPC coordinated actions** to increase the deterrent effect on other traders who use similar illegal practices.
- **Streamline and accelerate procedures for digital markets:**
 - **Fast-track procedures:** Develop "tailor-made fast-track responses" for specific cases, especially those that are widespread but short-lived, such as fraudulent e-shops or advertising campaigns.
 - **Clarify coordinator role:** The role of the case coordinator, whether a Member State enforcer or the European Commission, should be more clearly defined. This clarity would enable them to effectively lead the coordination of a binding CPC position and establish a clear protocol for follow-up actions.
 - **Horizontal, industry-wide approach:** The CPC network should consider a horizontal, industry-wide approach to cover several traders engaging in similar illegal practices simultaneously.
- **Strengthen capabilities and consistency across the network:**
 - **Provide more resources and training to national authorities,** particularly in countries with limited resources, to ensure they can actively participate in and contribute to CPC actions and sweeps.
 - **Increase the availability of e-enforcement tools** to help authorities detect new infringements in the digital environment.

Private enforcement

While Public enforcement plays an important role, improving private enforcement is equally crucial. It requires a multi-pronged approach that addresses procedural hurdles, fosters coordination and simplifies the legal framework:

Strengthening representative actions: implementing the RAD Directive

To ensure consumers can effectively seek redress, particularly in cases involving anticompetitive behaviour, it's crucial to bolster the Representative Actions Directive (RAD). A key step is to include Directive 2014/104/EU on **competition damages** actions in the annexe of the RAD Directive. This integration would allow qualified entities to pursue collective redress for damages resulting from competition law infringements, giving consumers a powerful tool against cartels and abuse of dominance.

Furthermore, a critical improvement would be to establish a uniform, **EU-wide opt-out** regime for these representative actions. This approach would replace the current system, where Member States can choose between opt-in and opt-out models. An EU-wide opt-out system would automatically include all affected consumers unless they explicitly choose to

leave the action. This would significantly increase the effectiveness and reach of collective redress. Limited exceptions to this opt-out rule could be decided by the court on a case-by-case basis, ensuring fairness and flexibility while maintaining a strong default position in favour of consumer protection.

Another critical consideration is introducing **statutory damages** into EU legislation. This would help overcome the significant challenge of proving the exact amount of damage, which is often difficult for individual consumers, especially in cases involving complex digital practices like dark patterns. By providing a fixed or calculated amount of damages, statutory damages would lower the burden of proof and make it more viable to pursue litigation.

Promoting coordination across enforcement mechanisms

Effective consumer protection requires seamless coordination between different enforcement bodies. The CPC Regulation must be harmonized with private enforcement through representative actions and Alternative/Online Dispute Resolution (ADR/ODR). This synergy would create a comprehensive system where public authorities can act quickly to stop infringements, while private actions provide redress for damages, and ADR/ODR offers a faster, less costly alternative for resolving disputes.

Strengthen the capabilities of consumer organisations

Consumer organisations, particularly in countries with limited resources, often face significant capacity gaps to engage into collective redress actions. It's crucial to facilitate resources and training. Moreover, to effectively combat modern consumer issues, consumer organisations need to increase their digital expertise. Providing them with access to e-enforcement tools will help them detect new infringements in the digital environment, such as misleading online advertising, hidden fees in e-commerce, and unfair practices in online marketplaces.

New approach for a new agenda

A note on simplification

Euroconsumers recognises the value of recent EU legislative initiatives, but notes that the growing number of acts has also added complexity to consumer law, which can make rights harder to implement effectively and swiftly. This is further complicated by disparities in how directives are transposed and interpreted by different Member States. To address this, Euroconsumers supports the process of simplification with the aim of ensuring consistency in concepts, definitions, obligations and enforcement, particularly where they intersect across different directives and regulations. This should ultimately lead to a more coherent and user-friendly legal framework. Critically, this process should not compromise

or rescind any existing consumer protections in place.

Fostering Innovation in Regulation

Euroconsumers believes that many of today's challenges can be addressed through innovative solutions. For the upcoming Consumer Agenda, we encourage the Commission to adopt approaches that recognise the inherent link between a competitive market and strong consumer empowerment. These goals are mutually reinforcing—not opposing—but to fully realise their potential, we must shift our perspective and develop bold, imaginative solutions that firmly embed this symbiotic relationship at the heart of policy making.

One way to exemplify that relationship could be regulatory sandboxes. They provide supervised environments where businesses can test innovative products, services, or data uses while ensuring compliance. When innovation is tested in collaboration with regulators, consumers can gain services that are not only cutting-edge but also safe, transparent, and respectful of their rights.

Providing Consumers with Real Alternatives

Innovation is a crucial driver of competition and progress; it should have consumers' concerns at heart and meet their needs. To truly harness innovation's potential, consumers need real access to new options that can help shape sustainable, digital and forward-looking markets. Take novel foods like cultivated meat, for example: a promising food innovation that can play a vital role in addressing climate change by offering more sustainable protein sources. Our survey found that half of consumers would be willing to try cultivated meat if it were approved and available in their market.⁵²

At the same time, strong competition and effective regulatory oversight are essential to ensure innovation benefits consumers without compromising safety, transparency, or fairness. But rather than viewing consumer protection as antithetical to innovation, the new Consumer Agenda must cement the belief that consumers are key players in driving innovation. This will help strike the right balance in enabling sustainable and digital innovation that empowers consumers and supports long-term societal goals and promotes a stronger economic market.

⁵² **Euroconsumers (2025)**, *Is there a place for cultivated meat on consumers' plates?* https://www.euroconsumers.org/wp-content/uploads/2025/05/Cultivated-meat-final_web.pdf

