

A Quantum Leap for European Consumer Enforcement

The Case for Urgent and Ambitious
CPC Regulation Reform



Executive Summary

**Europe has strong consumer protection rules.
What it lacks is the enforcement to match.**

Across the EU, the same infringement affecting millions of consumers in multiple Member States routinely produces fragmented, delayed, and contradictory national responses. **The Consumer Protection Cooperation (CPC) Regulation**, the framework designed to coordinate cross-border enforcement, is currently not delivering the outcomes it promises.

Euroconsumers¹, representing over 7 million consumers through national member organisations in Belgium, Italy, Spain, Portugal, Poland, and Brazil, has witnessed this enforcement gap first-hand. In the AdBlue emissions case, the Ryanair complaint saga, and the ongoing hand luggage dispute, the same pattern repeated itself: **slow procedures, inconsistent national decisions, opaque processes, and no structured feedback** to the consumer organisations that originally raised the alert.

Our overriding priority is clear: the European Commission must be granted enforcement powers for high-impact, Union-wide infringements. Without this, the system will continue to produce outcomes that are fragmented, slow, and inconsistent — and consumer trust in the Single Market will suffer the consequences.

The Enforcement Gap: Three Cases That Tell the Story

Euroconsumers' CICLE-X² cross-border complaints dashboard provides a **real-time window** into how consumer infringements spread across Member States. Three recent cases illustrate the systemic failures of the current CPC framework.

Case 1 — Stellantis AdBlue: Two Years for a Europe-Wide Fix

From mid-2022, a growing cluster of Citroën and Peugeot owners reported malfunctions in their AdBlue anti-pollution systems, with Stellantis directing them to replace entire tanks at their own expense. Euroconsumers' members Altroconsumo and OCU raised alerts with national authorities in Italy and Spain in December 2022, and flagged the issue to the CPC network. From the onset, it was clear that this was not just an Italian or Spanish problem but one that affected vehicles across Europe.³ Yet, **CPC did not react**. Only Italy's AGCM opened proceedings. When Euroconsumers' organisations in other countries sought equivalent engagement from Stellantis, they were ignored.

Therefore, Euroconsumers' organisations reached out again to the CPC network, this time with monitoring reports. Ultimately, the CPC stepped in and obtained commitments from Stellantis in December 2024 — **two years after the initial alert**. However, the compensation mechanism launched in January 2025 proved ineffective in practice, and Euroconsumers was forced to write to Stellantis again in March 2025.⁴

There is **no structured process** by which the Commission monitors implementation and reports back to the organisations that originally raised the alert. Throughout this period, Euroconsumers' Belgian member Testachats received **no feedback from its national authority (FPS Economy)**, leaving it unable to inform affected Belgian consumers of their rights or available remedies.



Case 2 — Ryanair: Opacity Weaponised Against Enforcement

In 2024 Euroconsumers' Belgian organisation Testachats filed three complaints with the Belgian FPS Economic Inspectorate regarding Ryanair's commercial practices but never received any feedback.⁵ Because of this stalled public enforcement, Testachats subsequently initiated injunction proceedings in May 2025.⁶ However, Ryanair's legal team exploited this opacity by the Belgian consumer authority to request a suspension, arguing that an investigation was pending before the FPS and that Testachats could provide no information about it.



Although the judge rejected Ryanair's request, the episode illustrates a **structural flaw**: the absence of feedback obligations in the CPC Regulation can be actively weaponised by defendants to delay and obstruct private enforcement proceedings.

Case 3 — Hand Luggage: Contradictory Decisions Across the Single Market

Euroconsumers' organisations **challenged the legality of extra fees** charged by budget airlines for carry-on luggage. Spain's consumer ministry, following a complaint from OCU, fined Vueling, EasyJet, Ryanair and Volotea a combined €150 million and demanded they stop.⁷ In Italy, on the contrary, the same practice was not found to be illegal. In Belgium, Testachats is still waiting for the outcome of similar complaints lodged with the national authority since 2024.



Identical practices. Three different national outcomes. This is the contradiction that the CPC Regulation was designed to prevent — and currently fails to address.



Systemic Challenges

These cases are not isolated incidents. They point to deeply embedded **structural problems with the current CPC framework**:

Fragmented EU-wide response to EU-wide problems

The same infringement affecting consumers across multiple Member States too often produces **fragmented, delayed or contradictory national responses**, as illustrated by both the AdBlue and Hand Luggage cases. European consumers and businesses deserve legal certainty across the Single Market.

Slow procedures in fast-moving digital markets

Enforcement timelines are far too long, particularly for fast-moving digital markets. By the time a decision comes, the number of affected consumers can be significant, and i.e. in cases of fraud (fraudulent e-shops), the “trader” may have disappeared.

Weak deterrence

Fines are inconsistent and sometimes so low they are irrelevant to large companies (e.g. Italy's cap of €10 million for unfair commercial practices). On top of that, there is insufficient monitoring of the commitments made by companies.

Fragmented national capacity

Wide gaps exist between active and passive national authorities, leading to uneven application of the same rules across the EU.

Lack of digital expertise

Many authorities **lack the IT and AI skills** needed to detect new types of infringements.

No structured feedback loops

Consumer organisations play an important role in gathering evidence and submitting alerts, yet the CPC regulation imposes **no obligation on authorities to keep consumer organisations informed** throughout the process. This absence can be actively exploited to obstruct private enforcement proceedings.

Policy Recommendations

Euroconsumers calls for a CPC revision that is ambitious in scope and urgent in timing. The following four reforms are essential.

1. Direct Enforcement Powers for the European Commission

Euroconsumers strongly advocates for **granting the European Commission direct enforcement powers** to address high-impact, Union-wide infringements. Experience with similar powers granted under the Digital Services Act can serve as inspiration here. National CPC authorities should remain competent for cases below the threshold.

Commission leadership should be triggered specifically for:

- Infringements with a **clear EU-wide dimension** (as in AdBlue);
- Cases where **fragmented action** risks contradictory outcomes or double jeopardy (as in the hand luggage case);
- Infringements by third-country traders with no effective EU footprint;
- Situations requiring **speed and uniform application** (such as dark patterns or AI-generated misinformation).

UCPD or UCPR?

The transformation of the **Unfair Commercial Practices Directive (UCPD) into a Regulation** can be an impactful enabler for meaningful centrally led European enforcement power, and therefore can count on Euroconsumers' support. **Without consistent interpretation across Member States**, direct enforcement cannot function effectively.



2. Modernising and Reinforcing the CPC System

Beyond direct Commission enforcement powers, **the CPC framework itself requires modernisation** to ensure timely, effective and consistent protection:

- **Standardised remedies across Member States** to ensure comparable relief and avoid discrimination between European consumers;
- **Fast-track procedures** for widespread but short-lived infringements;
- **Binding trader commitments** with structured monitoring and reporting back to the organisations that raised the original alert.

3. Structured Stakeholder Communication and Engagement

Consumer organisations play **a critical role in gathering evidence and submitting alerts** — yet the CPC Regulation imposes no obligation on authorities to keep them informed.

Therefore, Euroconsumers calls for:

- **Structured feedback loops** throughout enforcement proceedings;
- Where a complaint comes from a consumer body, that **organisation should be involved in the procedure**, including receiving supplementary information, receipt of the final decision and information on how harm was quantified and commitments monitored;
- **Timely public communication about CPC actions** to strengthen their deterrent effect, including updates throughout the enforcement process, clear explanations of infringements identified and the measures imposed.



4. Public Enforcement as a Gateway to Private Redress

Public and private enforcement are not at odds — they should be mutually reinforcing. Public enforcement should set the scene for follow-up private and compensatory enforcement more than it currently does.

In the context of competition law enforcement, decisions that clearly identify the harm caused to consumers have proven essential for follow-up collective actions — including Euroconsumers' class action against Apple for overcharging consumers' streaming subscriptions. **The same logic should apply in consumer law enforcement.**

Euroconsumers calls for **enforcement decisions to indicate and quantify the harm incurred by EU citizens**, in order to facilitate access to collective redress for affected consumers subsequently.



Conclusions

Consumer trust is not a soft objective — **it is a foundation of European competitiveness**. Consumers who feel unprotected do not engage confidently in digital markets, and businesses that play by the rules are undercut by those who do not. Enforcement is therefore not a technical afterthought; it is the engine that makes the entire consumer acquis meaningful. Europe already has strong consumer protection rules. What is lacking is the enforcement to match.

Euroconsumers has consistently highlighted the need for stronger enforcement, alongside the upcoming Digital Fairness Act. The Digital Fairness Act cannot deliver without a strengthened CPC Regulation to back it up. In other words, there is no DFA without CPC. Together, they offer the chance to not only clarify and modernise the substantive rules, but to ensure those rules are consistently interpreted and effectively enforced across the Single Market. **Clearer rules mean better enforcement**; better enforcement means real outcomes for consumers.

The goal is clear: put a stop to fragmented, slow and inconsistent enforcement outcomes. That's why, for Euroconsumers, granting the European Commission direct enforcement powers for high-impact, Union-wide infringements should be one of the key priorities of this reform. A quantum leap in enforcement starts here.

1 <https://www.euroconsumers.org/>

2 <https://www.euroconsumers.org/cicle-x-making-the-complaints-system-faster-stronger-and-easier-for-consumers/>

3 <https://www.euroconsumers.org/cicle-consumer-data-dashboard-quickly-spotted-costly-citroen-adblue-defect/>

4 <https://www.euroconsumers.org/scrutiny-adblue-compensation-platform/>; https://www.euroconsumers.org/wp-content/uploads/2025/03/20250312_Letter_Stellantis_AdBlue-commitments_2.pdf

5 <https://www.test-aankoop.be/familie-prive/reizen/pers/extra-betalen-voor-handbagage>

6 <https://www.euroconsumers.org/euroconsumers-member-testachats-takes-ryanair-to-court-its-time-to-ground-their-sneaky-pricing-tricks/>

7 <https://www.euroconsumers.org/not-without-my-hand-luggage/>



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Empower people,
improve the market.