

Recommendations for the revision of the CPC Regulation

Key recommendations

1. Modernise procedural rules to speed up cases.
2. Provide a stronger mandate to the Commission for addressing certain EU-wide infringements.
3. Introduce an EU instrument to temporarily limit or suspend Union market access.
4. Improve collaboration across enforcement domains.
5. Leverage new technologies and data sharing for efficient enforcement.
6. Provide guidance and recommendations for businesses and authorities.
7. Set up stakeholder dialogue to address systemic infringements and coordinate awareness campaigns.

In EuroCommerce's view, the **Consumer Protection Cooperation (CPC) Regulation** is a core pillar to ensure consumer protection and a level playing field in the EU market. Next to consumer law, EuroCommerce members also see a need to step up enforcement of EU product, environmental, taxation and digital laws.

In October 2024, we launched its **Compliance4All campaign**¹ to address unfair competition from third-country marketplaces and traders operating in the EU. In response to the sharp increase in individual shipments entering the EU, EuroCommerce called for a holistic enforcement approach that mobilises all relevant policy areas and makes full use of existing legal tools. At the same time, there is a clear need to strengthen the EU legal framework itself. Last year we published **ten legal recommendations**² aimed at improving the enforcement and enforceability of EU law, including the revision of the CPC Regulation.

In general, despite the CPC Regulation's objective to strengthen cross-border enforcement, the current framework suffers from several structural weaknesses that undermine its overall effectiveness regarding third-country marketplaces and traders. The **Commission's 2024 report on the application**

¹ www.eurocommerce.eu/compliance4all

² [EuroCommerce position paper: Restoring the level playing field in retail](#), 23 October 2025.

of the **CPC Regulation**³ identified a number of shortcomings, and the Commission's e-commerce action plan⁴ as well as the 2030 Consumer Agenda⁵ confirmed that a revision is necessary.

EuroCommerce believes that the CPC network and the **Commission should step up addressing cross-border infringements**, ensuring that non-compliant third-country marketplaces and traders do not gain an unfair competitive advantage.⁶ EuroCommerce therefore supports the Commission's commitment to put forward a comprehensive revision of the CPC Regulation in the fourth quarter of 2026. Such a revision is an essential tool and opportunity to strengthen consumer protection, modernise cross-border enforcement, address systemic non-compliance—particularly by third-country marketplaces and traders—and restore a level playing field in the EU retail market.

EuroCommerce has consistently highlighted the need for a swift review of the CPC Regulation, including through a **joint statement**⁷ with **BEUC and BusinessEurope** calling on the Commission to accelerate the revision.

Against this background and based on the current state of discussions, EuroCommerce puts forward the following recommendations to improve the CPC framework.

1. Modernise procedural rules to speed up cases

Effective enforcement requires timely action. The Commission's 2024 report⁸ highlights that CPC authorities and Single Liaison Offices (SLOs) are increasingly overwhelmed by a high volume of alerts, many of which lack sufficient or actionable information, alongside divergent national practices in how alerts are handled. In practice, several months—and in some cases years—can elapse between the launch of a CPC action and the verification of the implementation of traders' commitments.⁹ During this time, consumers continue to be exposed to harmful practices by third-country marketplaces and traders, undermining the credibility of enforcement.

Consumers need to trust that products are compliant and that their rights are respected - wherever, however, and from whomever they buy. Modernising CPC procedural rules should therefore prioritise faster and more efficient case handling in such cases. We believe that **streamlined procedures with clear timelines** would reduce the period during which non-compliant traders can operate, strengthen trust in enforcement mechanisms, and better protect consumers and compliant businesses. Furthermore, having clear rules and procedural safeguards for future CPC cases would improve legal certainty and clarity for traders and consumers in general as well as for traders under investigation.

Experience also shows that enforcement measures limited to a single Member State often lead to forum shopping, with non-compliant operators shifting activities to other jurisdictions. The revision should therefore **facilitate the initiation of joint actions involving all Member States** to prevent such practices and ensure effective EU-wide remedies.

³ Commission's [report on the application of the CPC regulation & biennial overview](#), 25 July 2024.

⁴ [Communication: A comprehensive EU toolbox for safe and sustainable e-commerce](#), 5 February 2025.

⁵ [Communication: 2030 Consumer Agenda and action plan for consumers in the single market 'A new impulse for consumer protection, competitiveness and sustainable growth'](#), 19 November 2025.

⁶ [Report German Retail Association \(HDE\) on impact Temu and Shein on German economy](#), 23 April 2026

⁷ [Joint statement of EuroCommerce, BEUC and BusinessEurope on Stepping up enforcement of consumer rules to ensure a level playing field in Europe](#), 2 June 2025.

⁸ Commission's [report on the application of the CPC regulation](#), 25 July 2024.

⁹ Commission's [report on the application of the CPC regulation](#), 25 July 2024.

2. Provide a stronger mandate to the Commission for addressing certain EU-wide infringements

Since the adoption of the CPC Regulation in 2018, consumer markets have changed significantly, notably due to the growth of e-commerce,¹⁰ the increasing role of third-country traders and marketplaces, and the use of new technologies such as artificial intelligence. These developments have exposed clear limitations in the CPC framework, in particular its inability to effectively address cross-border and EU-wide infringements.

If effective and efficient enforcement of the rules cannot be ensured, particularly against third-country traders or online marketplaces, this will undermine the competitiveness of EU-based operators compared to non-EU operators and ultimately harm consumers.

EuroCommerce therefore calls for a **stronger mandate for the European Commission**. In clearly defined circumstances, the Commission should be empowered **to initiate and lead investigations** into widespread infringements with a Union dimension, especially when traders are based outside the EU, in order to ensure consistent enforcement across the Union. Such powers should be triggered on the basis of **objective and cumulative conditions** which must all be met. These criteria need to be precise and measurable to ensure the highest level of predictability and legal certainty. They should include, in particular:

- The situation falls within the definition of a widespread infringement with a Union dimension;¹¹
- A high proportion (i.e. a clearly measurable share) of the products or practices concerned is found to be non-compliant with EU consumer laws;
- The non-compliance is persistent and serious, as evidenced by its duration over time or repeated occurrence; and
- The infringement is causing severe impact on the market (e.g. a distortion of competition, taking into consideration the trader's share in the local market).

In addition, the revision should allow the Commission **to take over investigations of such cases from one or several Member States** where enforcement cannot be effectively achieved within the CPC network, or where enforcement at national level is insufficient.

The deterrent effect of the CPC framework is further weakened by the absence of sufficiently effective enforcement measures regarding third-country traders and online marketplaces, as authorities often prioritise negotiated commitments. Moreover, the voluntary nature of participation by national authorities in coordinated actions can facilitate forum shopping.¹² To address this, the Commission should explore the introduction of a general principle whereby, in defined cases of widespread infringements with a Union dimension, **participation in coordinated actions is presumed for all CPC authorities, unless a Member State explicitly opts out**.

Coordinated CPC actions should be driven by the **objective of restoring compliance** of traders targeting EU market and EU consumers, rather than by immediately imposing sanctions. To that end, the revision should introduce a **structured escalation model combining enforcement measures** and penalties in case of widespread infringements with a Union dimension. Initial measures should prioritise softer tools guiding traders towards compliance, with progressively stronger measures applied where non-compliance persists. As a measure of last resort, other penalties such as fines or temporary

¹⁰ [2025 Consumer Scoreboard](#); [State of Grocery Retail 2026, EuroCommerce & McKinsey, 2026](#)

¹¹ Art. 3 (4) of the CPC Regulation: 'widespread infringement with a Union dimension' means a widespread infringement that has done, does or is likely to do harm to the collective interests of consumers in at least two-thirds of the Member States, accounting, together, for at least two-thirds of the population of the Union.

¹² [The Letta report](#) confirms the lack of resources on national level, stating that 9 national enforcement authorities never participated in a coordinated action due to the lack of resources.

restriction of market access could be envisaged. These **measures should be linked to clear, realistic timelines**, allowing the CPC network or the Commission to escalate enforcement swiftly where earlier steps prove ineffective.

Finally, joint CPC actions demonstrate that third-country traders frequently mislead consumers through their marketing practices. To improve enforcement effectiveness, the CPC network and the Commission should **assess which categories of traders are systemically non-compliant and which types of cases have posed enforcement challenges in the past**. Such an assessment would support a more targeted and risk-based enforcement approach and help ensure that sufficient resources are allocated so that large-scale and high-impact cases do not escape effective scrutiny.

Interplay with other EU legislation

The Commission has on several occasions expressed its intention to convert the **Unfair Commercial Practices Directive** (UCPD) into a Regulation, arguing that, under the current framework, it can directly enforce only EU regulations, not directives, and that most of Union-wide infringements investigated by the CPC network relate to the UCPD.

However, this raises a number of important questions and concerns, in particular:

- How the Commission intends to ensure that a conversion would remain strictly technical and would not introduce new substantive obligations (including avoiding confusion between the conversion and any other type of amendments that might be foreseen under the Digital Fairness Act);
- How varying national rules that go beyond the current Directive would be affected (despite being a maximum harmonisation instrument, the UCPD allows for certain national specificities and carve-outs);
- What would happen with national frameworks that combine B2C and B2B provisions, and with potential terminological tensions and legal uncertainty arising in such cases when the national transposition measure would not be repealed in full;
- What implications the conversion would have for existing national case law and legal interpretations.

The Commission should explore all possible options to improve enforcement, alongside the potential conversion of the UCPD, ensuring that a full range of approaches can be considered.

In general, we believe that the existing consumer protection framework already provides a high level of protection, as confirmed by the Digital Fairness Fitness Check.¹³ However, its effectiveness is undermined by fragmentation and insufficient enforcement, a finding also reflected in **joint study on digital fairness in retail**.¹⁴ Priority should therefore be given to strengthening enforcement rather than introducing new rules.

The absence of direct Commission enforcement powers under the CPC framework creates asymmetries with parallel investigations conducted by the Commission under the **Digital Services Act** (DSA). Granting the Commission limited and clearly defined enforcement powers under the CPC Regulation should help align enforcement approaches in cases of widespread cross-border infringements, while avoiding overlaps with the DSA enforcement system.

¹³ Confirmed by the Commission's [report on the fitness check on digital fairness](#), 3 October 2024.

¹⁴ [Report of the study on "Digital Fairness in Online Retail" - EuroCommerce](#), 14 November 2024.

Finally, to restore a level playing field, EU legislators should introduce a system of **Certified Authorised Representatives with full responsibility for product compliance** of products placed on the EU market without an EU based manufacturer or importer.¹⁵ To avoid duplication and ensure a coherent, efficient and enforceable legal framework, the Commission should ensure coordination of potential parallel initiatives on responsible persons for third-country operators.

3. Introduce EU instrument to temporarily limit or suspend Union market access

The current CPC Regulation does not empower authorities to take EU wide measures restricting access to traders' websites and online content. Article 9(4)(g) allows national authorities to request the removal of online content, but such measures can only be applied at national level.¹⁶ Experience over recent years has shown that this approach is insufficient in an increasingly digital and cross border market.

At the same time, retailers that are established in the EU are subject to regular enforcement activities, and in case of persistent and serious non-compliance, authorities can temporarily close business activities. However, this is nearly impossible for third country marketplaces and traders.

EuroCommerce therefore calls on the Commission to introduce an **EU level instrument** that would allow for the **temporary restriction or suspension of access to the Union market**, as a measure of last resort, particularly in cases of persistent and serious non-compliance by third country traders and marketplaces. The conditions for activating such an instrument should be clearly defined to ensure predictability and legal certainty for all market players. The period of limited or suspended access could depend on the repetitive character of the infringement, the severity of the infringement, the number of products or product offerings, the number of consumers exposed, the number of Member States affected, etc.

Because third-country traders and marketplaces operate online, non-compliant practices can easily affect consumers across multiple Member States. In this context, purely national restrictions on market access are inherently ineffective. When access is restricted in one Member State, non-EU operators can quickly redirect their activities to other Member States where no such restriction applies, undermining enforcement efforts and allowing harmful practices to continue. This clearly demonstrates the need for an EU-wide instrument to ensure effective and consistent enforcement and prevent border shopping.

4. Improve collaboration across enforcement domains

Consumer protection issues increasingly intersect with other policy areas, such as data protection, digital, customs, product safety, etc.¹⁷ Effective enforcement therefore requires a more structured and systematic approach to **cooperation across enforcement domains**. The current fragmentation limits authorities' ability to fully understand complex infringement patterns and to respond effectively.

EuroCommerce calls for the establishment of a clearer EU-level framework to strengthen **coordination between competent authorities across enforcement domains**, both at national and EU level. It would

¹⁵ [EuroCommerce Position on the Market Surveillance Regulation](#), 4 February 2026.

¹⁶ [Wish.com delisted in France](#) (2021); [Letter from French retailers to the government to delist Shein, Temu and AliExpress](#) (June 2025).

¹⁷ At EU level e.g. CPC Network, Consumer Safety network, Customs Expert Group, European Data Protection Board, European Observatory on Infringements of Intellectual Property Rights (EUIPO), etc.

enable a more holistic enforcement approach, facilitate the pooling of resources and expertise, and improve authorities' capacity to address complex, large-scale and cross-border cases.

Stronger collaboration across enforcement domains is essential to ensure consistent application of EU consumer law, avoid enforcement gaps, and maximise the overall effectiveness of the CPC framework.

More effective and efficient enforcement of EU rules!

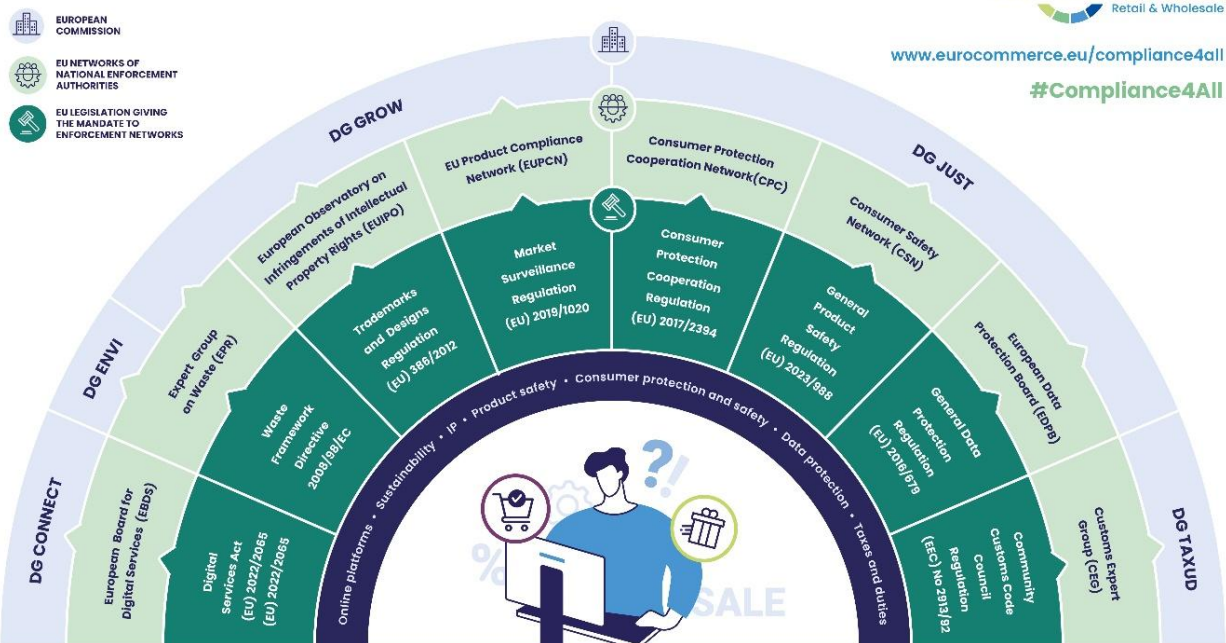


Figure 1, EuroCommerce (2025)

5. Leverage new technologies and data sharing for efficient enforcement

EuroCommerce encourages the Commission to further **develop digital enforcement tools** accessible to national authorities and to facilitate the pooling of resources. Digital tools and data analytics can significantly enhance authorities' ability to detect and respond to non-compliance, improve enforcement efficiency, and enable the early identification of emerging risks.

In particular, enforcement would benefit from:

- A connection to relevant registers or databases (e.g. EU Safety Gate, Customs Data Hub, Digital Product Passport Registry, etc.) is urgently needed to improve compliance. This connection will make it easier for operators to perform bulk checks, which expediting the detection of non-compliant products;
- Tools or algorithms that can detect B2C misleading practices by traders or online marketplaces;
- Tools or algorithms that can monitor commitments made by operators in the context of an enforcement investigation;
- Tools for efficient, confidential and safe data sharing mechanisms between competent authorities and businesses should be developed.

In this context, the future EU Customs Data Hub represents a promising model, as it is intended to interact with multiple national and EU level systems, including the digital product passport. Such mechanisms should be based on the "only once" principle, with data collection limited to what is strictly necessary for enforcement purposes.

6. Provide guidance and recommendations for businesses and authorities

Clear, consistent, timely and practical guidance is essential to ensure the effective and uniform application of EU consumer protection rules. To support both compliance and enforcement, the CPC Network should regularly **publish and update best practices, interpretative guidance and practical compliance tools**, such as checklists and explanatory documents, for both businesses and national authorities. Such guidance would help reduce divergent interpretations, promote consistent enforcement, and provide legal certainty for compliant traders, while supporting authorities in their day-to-day enforcement activities.

7. Set up stakeholder dialogue to address systemic infringements and coordinate awareness campaigns

EuroCommerce believes that trade associations can play a more supportive role in identifying systemic infringements of EU consumer protection rules. This role should be embedded in a structured and transparent exchange with enforcement authorities.

EuroCommerce therefore recommends **institutionalising a structural regulatory dialogue** between CPC authorities, traders, and other relevant stakeholders. This dialogue should focus on identifying areas of high non-compliance with specific consumer law provisions, as well as emerging misleading practices. Such a structural enforcement dialogue would help **improve mutual understanding between authorities and traders**, allow for early identification of compliance challenges, and ultimately strengthen overall compliance with EU consumer protection rules.

To support this approach, the CPC Network should work together with industry, consumer organisations and other stakeholders to **establish a multi-year priority enforcement calendar**, setting out agreed enforcement focus areas (e.g. price announcements, right of withdrawal, pre-contractual information, green claims). Such a calendar should, however, remain sufficiently flexible to adapt to unforeseen developments such as evolving geopolitical circumstances or other emerging priorities.

Targeted enforcement priorities should be complemented by **awareness-raising campaigns and compliance workshops** for traders at national level, led by national authorities with the support of EU and local trade associations. This coordinated approach would enable traders to better prioritise compliance efforts and, over time, contribute to higher levels of compliance across the EU.

Conclusion

A swift revision of the CPC Regulation is a key opportunity to strengthen consumer protection, address systemic non-compliance—particularly by third-country marketplaces and traders—and restore a level playing field in the EU retail market. EuroCommerce stands ready to support the Commission and Member States in this process through continued dialogue and close cooperation.

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EuroCommerce is the principal European organisation representing the retail and wholesale sector. It embraces national associations in 27 countries and 5 million companies, including leading global players and many small businesses. Over a billion times a day, retailers and wholesalers distribute goods and provide an essential service to millions of business and individual customers. The sector generates 1 in 7 jobs, offering a varied career to 26 million Europeans, many of them young people. It also supports millions of further jobs throughout the supply chain, from small local suppliers to international businesses. EuroCommerce is the recognised European social partner for the retail and wholesale sector.