



**Independent
Retail Europe**

**ROADMAP STRENGTHENING THE ROLE OF CONSUMERS IN
THE GREEN TRANSITION
- COMMENTS OF INDEPENDENT RETAIL EUROPE -**

5 AUGUST 2020



GENERAL CONSIDERATIONS

Independent Retail Europe stresses the importance for EU consumer policy being consistent. Please note that we will respond in more detail to the open public consultation of the New Consumer Agenda (deadline: 6 October) as well as the survey currently undertaken by ICF on this subject of consumer empowerment. We will therefore concentrate on some general comments on this Roadmap on the Inception Impact Assessment.

It goes without saying that in today's fast-changing environments, business as usual (as Option 0 is described) is not sufficient. However, a re-invention of the wheel (Option 2) would also not be advisable as the expected disruptions to the market and well-functioning legal frameworks would outweigh any potential benefits. We would therefore be most in favour of a variation of Option 1 although this should be done with caution and at the right pace.

It should especially be noted that:

- ➔ Products are inherently very different which makes a one-size-fits all approach impossible. The different types of failures require more or less complex repairs. Certain repairs can and should only be undertaken by experts for reasons of complexity, product safety et al.
- ➔ It is imperative that existing and newly revised EU legislation, such as the Directives on contract rules for sales of physical goods (2019/771) and digital content (2019/770) as well as the Implementing Regulations to Directive 2009/125/EC on Eco-design, is first transposed into national law, enforced properly and applies for a few years, before the introduction of additional legislation makes sense.
- ➔ Whilst consumer rights are and should continue to be a priority, they should not hinder the Internal Market. Divergences in Member States in consumer protection make it difficult for businesses, especially SMEs, to operate cross border.

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*Established in 1963, **Independent Retail Europe** (formerly UGAL – the Union of groups of independent retailers of Europe) is the European association that acts as an umbrella organisation for the main groups of independent retailers in the food and non-food sectors.*

Independent Retail Europe represents retail groups characterised by the provision of a support network to independent SME retail entrepreneurs; joint purchasing of goods and services to attain efficiencies and economies of scale, as well as respect for the independent character of the individual retailer. Our members are groups of independent retailers, associations representing them as well as wider service organizations built to support independent retailers.

Independent Retail Europe represents 24 groups and their 380.980 independent retailers, who manage more than 757.000 sales outlets, with a combined retail turnover of more than 971 billion euros and generating a combined wholesale turnover of 291 billion euros. This represents a total employment of more than 6.486.000 persons.

More information about Independent Retail Europe under www.independentretailleurope.eu