

## Revision of the CPC Regulation

eu travel tech welcomes the forthcoming revision of the Consumer Protection Cooperation (CPC) Regulation, which aims to strengthen the cross-border enforcement of consumer law within the EU.

Our members share the Commission's goal of ensuring **fair, consistent and efficient enforcement** of EU consumer protection rules. This revision is an opportunity to improve enforcement consistency, reduce fragmentation, and preserve the elements of the current framework that already work well.

Our central message is straightforward: the gaps identified in the EU consumer protection framework stem from the uneven or incomplete enforcement of existing rules, not from insufficient regulation. Updating the CPC framework and increasing cooperation and dialogue between authorities so they can apply the existing *acquis* effectively and consistently is therefore the right policy response. For the same reasons, duplicative obligations of the kind envisaged under the Digital Fairness Act (DFA) should not be pursued where existing rules can be enforced better.

### [Our five priorities](#)

1. **Preserve the “one-stop-shop”:** coordinated CPC enforcement gives businesses legal certainty and consumers more consistent outcomes across the EU, although it is not as effective as it could be. It should be enhanced.
2. **Improve consistency across enforcement authorities:**
  - ❖ The CPC Regulation contains only limited provisions addressing overlaps with other enforcement authorities, such as Digital Service Coordinators or data protection authorities.
  - ❖ Where *remits* are unclear, authorities may be less confident in taking action, leading to underenforcement. Where they do decide to take action, the same consumer protection issue can lead to divergent conclusions. Greater clarity will lead to more enforcement and accountability.
  - ❖ Authorities' responsibilities should therefore be more clearly delineated to avoid duplication and conflicting decisions.
  - ❖ The Commission's coordinating role should be reinforced so that, where several authorities investigate the same issue, it can steer them towards a single and consistent outcome. The Commission could issue interpretative guidance to enable more consistent enforcement across Member States

- ❖ Commitments agreed through a concluded CPC procedure should not be re-opened by individual national authorities. Reopening settled cases undermines legal certainty and the value of the one-stop-shop.
- 3. **Reduce national fragmentation:** Key consumer law directives, including the Unfair Commercial Practices Directive (UCPD), Consumer Rights Directive (CRD) and Unfair Contract Terms Directive (UCTD), can be applied unevenly across Member States, creating legal uncertainty and higher cross-border compliance costs. We therefore support measures to improve consistency in interpretation, implementation and enforcement across the EU. This could include greater harmonisation, where appropriate, but should avoid reopening settled substantive rules or creating new obligations.
- 4. **Keep any EU-level enforcement risk-based and non-duplicative:** where EU-level enforcement powers are introduced, they must complement, not duplicate, national enforcement and meet the conditions below.

[If the Commission receives centralised enforcement powers: minimum safeguards, thresholds and procedural rules must be met](#)

Our priority is **harmonisation of interpretation**, not centralisation for its own sake.

We believe that more centralised enforcement, in specific circumstances, could enable this harmonisation and reduce the prevalence of illegal online practices previously identified by CPC Network 'sweeps'. However, any EU-level enforcement system introduced alongside national powers should rest on at least the following points:

- **One regulator / one-stop-shop:** there should be no parallel actions or additional layer of scrutiny by a different authority on the same or similar topic.
- **Equal treatment:** once a matter is handled at EU level, the same facts and companies should not be reassessed at national level. National authorities should follow the EU approach in similar cases.
- **Clear roles and risk-based allocation:** The system should include proportionality safeguards and a clear delineation of roles and responsibilities between EU and national authorities EU-level enforcement should be triggered based on **risk criteria** (rather than the size like in the model set up in the DSA). This would allow high-impact infringements to be addressed regardless of the company's size. Clear, objective criteria for prioritising and opening a case are also needed to avoid the same sectors being targeted year after year.
- **Defined investigation scope:** the scope of a CPC investigation should be fixed at the outset. Where authorities join an ongoing case and add new concerns, investigations can expand without concluding. A defined scope gives all parties a clear and predictable framework.

### [Focus on effective remedies, not higher fines](#)

A central driver of the CPC Regulation revision is strengthening /aligning deterrent effects of actions. It has been noted that the current system is characterised by an absence of fines and a wide variation in national fine levels. While potential fines are an important tool in enforcement authorities' toolkit, they should not become the centre of gravity of the new framework. **The most effective deterrent is the remedy itself:** correcting a non-compliant interface changes outcomes for every consumer immediately, whereas a one-off fine does not. Compliance difficulties are largely driven by the complexity of overlapping rules, not on unwillingness to follow them. Swift remedies, clear guidance and dialogue will resolve issues faster and more durably than higher fines. Any new framework for imposing fines should incentivise businesses to resolve any illegal conduct swiftly, by facilitating steep discounts where a business takes action to remedy any breach quickly.