

## **CME submission public consultation EU consumer agenda 2025–2030**

Classifieds Marketplaces Europe (CME) welcomes the opportunity to submit input to the upcoming **EU Consumer Agenda 2025–2030** and to support the European Commission in shaping a forward-looking, balanced, and effective consumer policy framework.

CME is a coalition of **EU-headquartered companies**, including [Adevinta](#), [OLX](#), [Vend](#), [Vinted](#), [Wallapop](#), and [CustoJusto](#), operating online classifieds marketplaces that foster sustainable growth in the EU Single Market. Our members connect individuals and local businesses, making it easier to buy and sell **second-hand goods**. With over 50 brands spanning 21 European countries, our members employ more than 10,000 people dedicated to facilitating sustainable commerce.

As a coalition representing **second-hand marketplaces** that enable local and mostly C2C transactions, CME is committed to empowering consumers, encouraging sustainable consumption, and contributing to a fair and inclusive digital economy.

### **Consolidating the existing consumer acquis and ensuring effective implementation**

CME welcomes the adoption of recent milestone legislation, including (non-exhaustive list) the Digital Services Act (DSA), General Product Safety Regulation (GPSR), Product Liability Directive (PLD), Artificial Intelligence Act, Accessibility Act, Empowering Consumers for the Green Transition Directive (ECGT), Right to Repair Directive, Ecodesign for Sustainable Products Regulation (ESPR), and the Packaging and Packaging Waste Regulation (PPWR).

Put together, these constitute a robust consumer protection acquis, particularly in the online environment. However, the full impact of these laws can only be assessed once they are **fully implemented, enforced, and understood** by both consumers and businesses – which requires time.

These frameworks are still in early stages of implementation. Their full potential can only be realised once:

- **Secondary legislation** (e.g. delegated and implementing acts) is adopted in a timely and coherent manner;
- **Practical guidelines and clarifications** are issued by the Commission as foreseen in many of these texts; and
- **New rules are fully implemented and enforced** across Member States, allowing both consumers and businesses to develop a full understanding of their rights and responsibilities.

## Supporting sustainable consumption through second-hand marketplaces

Second-hand marketplaces play a critical role in advancing the EU's environmental, economic, and social objectives. By facilitating the resale and reuse of goods, our platforms help reduce waste, extend product lifecycles, and strengthen local, low-resource economies. This contributes directly to the goals of ensuring a **competitive and sustainable economy for Europe**.

**Reuse is often overlooked in circular economy debates**, but when it is discussed, it tends to focus on offline channels, forgetting that most reuse now happens online between consumers. The role of online in the second-hand market is increasingly tangible, for example, a recent survey in Norway<sup>1</sup> shows that around **60%** of the respondents, nationally representative in age, gender, and geography, had made their most recent second-hand purchase online. At CME, we believe this is a positive development that shows **online marketplaces are a central driver for reuse**, giving EU consumers access to quality everyday items while strengthening Europe's circular economy.

While policy attention has rightly focused on product safety, consumer vulnerability, and deceptive online practices, there is still significant untapped potential in supporting sustainable consumption models that align environmental objectives with consumer protection goals. CME believes the EU should continue to promote **frameworks that recognise the role of circular business models in delivering both environmental and consumer value**.

For example, taking into consideration how **price sensitive** consumers can be,<sup>2</sup> the importance of ensuring affordable sustainable alternatives should not be overlooked. This is why we welcome the ongoing discussions on **VAT reduction for second-hand goods**, for example, or vouchers for repairing products as introduced in some Member States. In a recent and wide survey conducted by OLX in Poland, 69% of the respondents support legal incentives like **tax relief for selling used goods**.

Another concrete example of where policy could make a difference is **shipping**. Imagine finding a used sweater for around €10, only to discover that shipping costs nearly half as much – this discourages many from completing the purchase. Campaigns run on [FINN](#) show that when shipping costs are reduced by 50%, this can lead to up to 40% more second-hand transactions.

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<sup>1</sup> See FINN's Secondhand Survey from 2025, which maps Norwegians' behavior, attitudes, and habits around buying and selling used goods. The survey was carried out by Analysesjefene AS in collaboration with CINT/SYNO, with data having been collected through an online panel in Norway, with respondents completing a digital questionnaire.

<sup>2</sup> Visible for example in the [EU Eurobarometer 535](#), 94% of the respondents consider the price very important and/or rather important the price, when asked about the importance they assign to a product's price, quality, brand and environmental impacts. A McKinsey research '[What's trending in white goods? Durable, efficient, and affordable](#)' (April 2025) also shows affordable price is the most important factor for consumers when buying appliances. [Vinted's Impact report](#) (June 2024) shows that 'the main motivation for Vinted members to choose second-hand over new is that it's great value for money: almost half (48%) chose to buy a second-hand item because the price was lower than new.'

Removing VAT on shipping for secondhand goods would therefore strengthen the core of reuse in a tangible way – by **eliminating a barrier that many consumers encounter in everyday life**.

We also find it extremely important to ensure expert and data driven policies, and commend the work being done in Norway where an **independent and multi-disciplinary expert group** is exploring different alternatives to promoting sustainable consumption in an holistic way. In its [report](#) (May 2025) the expert group recommends stimulating the sale of used goods, either in the form of direct subsidies for the sale of used goods by businesses, or through an exemption from value-added tax.

### **Empowering consumers through education and awareness-raising**

Robust consumer protection depends not only on strong laws and enforcement, but also on **well-informed and empowered consumers**. CME calls for greater investment in **coordinated awareness-raising initiatives for consumers**, particularly to improve understanding of:

- The **environmental and economic impacts** of purchasing decisions;
- **Alternatives and options for more sustainable consumption**, including second-hand and circular models;
- **Practical steps consumers can take to participate in circular economy**, for instance by giving a second life to unused products through **resale or donation**.

We underscore the importance of **communication to consumers and small businesses in a clear, understandable and relatable** way. For example, the campaigns developed by the UK and the Spanish Governments to explain the DAC7 new rules can be taken as inspiration. They outlined which changes the new rules would introduce, and would not, to avoid confusion and wrongly-founded assumptions.

### **Ensuring proportional and risk-based rules and enforcement**

CME supports the Commission's ambition to ensure a level playing field across the Single Market. We support the principle that a consumer should **always feel safe** which is a key goal to all of us. However, this should **not result in disproportionate rules** that do not take into account the **diversity of actors**, including platforms operating in the digital economy. We therefore call for a Consumer Agenda that remains **realistic and targeted**.

### **Conclusions and recommendations**

The coming years offer a unique opportunity to **consolidate the EU consumer protection acquis** while supporting the circular and digital transitions. To this end, CME encourages the Commission to:

- Prioritise **effective and harmonised implementation** of the recently adopted legislative framework;
- Invest in **consumer awareness and education**, to foster informed and sustainable purchasing habits;
- Promote **sustainable consumption and reuse**, including via incentives and VAT considerations;
- Ensure **proportional and risk-based regulation** that accounts for the diversity of digital intermediaries;
- Strengthen **coordinated enforcement**, both within the EU and with regard to third-country operators.

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