

UNICE

THE VOICE OF BUSINESS IN EUROPE

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2 May 2002

Mr Ramon De Miguel
Spanish Secretary of State for
European Affairs
Ministry of Foreign Affairs
C/ Padilla 46
28071 Madrid (Spain)

Dear Mr De Miguel,

I am writing to you in view of the 21 May Internal Market Council and in particular in the context of the discussions on the follow-up to the Commission green paper on EU consumer protection.

Despite strong business scepticism about the Commission's favoured ideas, we understand that the Commission considers that it has received sufficient support to progress its initiative rapidly.

UNICE feels that concerns and doubts expressed by business stakeholders and other groups have not been sufficiently taken into account. UNICE believes that, prior to embarking on any of the green paper's options, clarification and further consultation are indispensable.

On the contrary, UNICE is deeply concerned to learn that the Commission has decided to press on with its favoured option by presenting a follow-up Communication focused on one specific direction, rather than the white paper which should have allowed for further debate, as broadly requested by stakeholders.

UNICE has strong concerns about certain aspects of the Commission proposal such as the scope and detail of the intended framework directive and its impact on the existing consumer protection directives and the consumer protection general framework, the role and the competences of the proposed Regulatory Committee and the use of legally binding self-regulatory codes and mandated co-regulatory dialogue of stakeholders (see our detailed comments at annex).

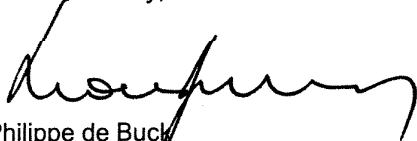
Given the very far-reaching consequences of the proposed reform, not only on consumer policy but also on other policy areas, such as competition, and more generally on the regulatory environment of the EU, UNICE is of the strong opinion that the new approach suggested requires careful and unhurried consideration by all interested parties.

UNICE therefore urges you to demand a further broad debate before any concrete move is decided on this dossier.

We trust that you will bear these comments in mind in your forthcoming discussions on this subject.

We remain at your entire disposal should you need further information.

Yours sincerely,



Philippe de Buch
Secretary General

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