



An Roinn Fiontar, Trádála agus Fostaíochta
Department of Enterprise, Trade and Employment

Ireland's response to the draft of the consultation paper on developing a harmonised methodology for classifying and reporting consumer complaints across the European Union

Ireland welcomes a move forward towards developing a harmonised methodology on classifying and reporting consumer complaints across Europe and therefore, we are pleased to participate in this consultation.

The *Background/Introduction/The need for EU-wide complaints data/Towards a common methodology & Policy options* sections are self-explanatory. Since the aim of the consultation is to assess whether a common methodology is needed and the policy options, the questionnaire seems to satisfactorily comprehend these issues. However we wish to comment in particular on two aspects of the classification: complaints and associated monetary value.

Ireland considers that it would be best if the questionnaire also emphasised the need for an unambiguous 'nature of the complaint' classification (e.g. non delivery, defective product, billing, contract terms, etc.) to complement the suggested harmonised methodology. Otherwise, one may know that a number of complaints about transport or communications were received but will not know what actually happened!

Ireland is also concerned as to how one would assess "associated monetary value". While it is a very good idea, it is a difficult tool to use. How does one assess monetary value? How does one put a value on the lack of a display price for biscuits? Is it a refund for a concert that was cancelled? It is an assessment of how much money customers were saved as a result of an enforcement action? If a consumer complains that a sofa was advertised at €1,500 but when they went to the shop they had to pay €1,600 and after an agency intervenes they get the €100 back, what is the monetary value of the transaction; is it €1,600, €1,500 or €100?

In all other respects, we commend the approach taken in this document and consider it will contribute to strengthening the internal market.

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