

10th of October 2008

Position paper of the Federation of German Consumer Organisations

Consultation document on developing a harmonised methodology for classifying and reporting consumer complaints across the European Union

The Federation of German Consumer Organizations (vzbv) welcomes the European Commission's initiative to develop a harmonized methodology for classifying and reporting consumer complaints across the European Union.

During the last couple of years vzbv together with the German federal consumer advice centres has developed an IT-infrastructure to collect data both about consumer complaints and enforcement activities. While the infrastructure is in place, we are now focusing on feeding the database with information. The classification we are using is according to the areas of advice: construction/energy/environment; food and nutrition; finances and insurances; travel/leisure/mobility; health; telecommunication/media; and markets and law.

While we welcome the European Commission's initiative in the development of a harmonized methodology, we regret that the consultation does not adequately take into account differences in the set up of organizations collecting complaints in the Member States. In Germany complaints are collected not only by state agencies and consumer organizations but also by other entities. Some of these do not use any systematic procedures to register complaints. It is therefore necessary that the European Commission proposes in more concrete terms how this harmonized methodology might look like and how to take account of the various entities that might collect information.

Furthermore, we caution that before data on complaints is collected in Member States and aggregated by the European Commission, one needs to ensure that the data is collected on the basis of a common methodology. Otherwise it is not comparable. If done in haste, an aggregation of consumer complaints might do more damage than good.

We would therefore welcome a meeting between the European Commission Service, the German Consumer Protection Ministry and vzbv to offer the opportunity to explain what kind of data is already collected in Germany and according to what methodology.

Personal data

Name of organisation (compulsory)

Country of establishment of the Organisation (compulsory)

Address (compulsory)

Website address (if available) (optional)


Name contact person (compulsory)

Telephone number contact person (compulsory)

E-mail contact person (optional)

Stakeholder group (compulsory)

- Member State Authority NGO Industry
 Individual Other

 Please specify (compulsory)

Size of the organisation (compulsory)

- 1 - 49 50 - 99 100 - 149
 150 - 199 200+ Other

