Survey on Consumer Associations in the Mediterranean

Working Group on Consumer Issues

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1. Introduction

During the 19th General Assembly held in Istanbul in May 2015, MEDREG approved the proposal of the CUS WG to start a more direct engagement of consumers within MEDREG activities, with particular regards to their associations. Moreover the proposal to draft an action plan to create a network of the Mediterranean energy consumers' association was approved.

The first step of this medium term objective has been identified in a survey to investigate which are the main actors and current activities in the Mediterranean, with the following goals

- To provide a general overview on the existing Consumer Associations (CAs)
- To promote an extensive CAs engagement in MEDREG activities
- With a mid-term view, to promote an eventual future coordination of CAs on energy topics

According to the new CUS WG policy to provide direct responsibility of deliverables to defined member with support by a group of colleagues, AEEGSI took the leadership of the task considering the long term experiences in dealing with consumers affairs.

The survey was conducted with a questionnaire, preliminary shared within the CUS WG, whose structure was divided in two main parts. A first section was conceived to investigate the current situation in each country (i.e. consistency, status of consumers associations and legal framework), the interactions with the energy regulatory process and which were the expectations coming from a more intense engagements. The second section was devoted to a more detailed description of each associations with the goal to start creating a sort of detailed map of such associations.

Preliminary results were presented at the 20th General Assembly in Tirana in December 2015, then the final report was approved in the 21th General Assembly in Malta in May 2016, where was approved also to prepare and share within MEDREG Community a set of guidelines and recommendations to promote a better and more efficiently consumers associations.

I would like to thank in particular Sabine Hinz from CRE (France). A special thanks to the MEDREG secretariat and to all the WG CUS members who supported the achievement of the report sending data, comments and information.

Nicolò Di Gaetano

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2. Background

As consumers bear the most relevant costs of the decisions taken within the energy sectors, the regulator's choices affect them both directly and indirectly. Indeed, energy regulation impacts on the economic and social development of our societies with regard to fair competition, cost-reflective energy prices as well as the quality of services proposed by undertakings. It influences the structure of supply offers, and the services, security and quality of supply provided to consumers.

Therefore, most of MEDREG members have clear responsibilities with regard to consumer protection, which is part of their core regulatory mission. Regulators have to ensure that consumers benefit from efficient market functioning and effective competition while contributing to consumer protection, notably of vulnerable households. Tackling into account the particular situation of vulnerable consumers is also one of the common regulatory goals of the MEDREG Strategy 2020-2030 which is supported by all energy regulators in the Mediterranean.

The overall goal of energy regulation is that networks are operated properly and at reasonable costs and to strike the right balance between cost efficiency, investment and consumer interests (e.g., cost-reflective network tariffs). Consumer issues arise not only in liberalized markets, where competition is progressively implemented, but also in non-liberalized markets. Issues that concern all countries include efficiency of the operator(s), quality of service, unfair billing and contracting practices.

Over the past years Mediterranean energy regulators have looked at consumer issues from different angles. They adopted recommendations of minimum requirements to ensure consumer protection (2011), looked at energy billing practices (2013) and at actions taken by regulators with regard to consumer education and information (2013). MEDREG also developed a brochure on consumer rights (2015) as well as worked on access to energy issues (2015) and investment conditions in the Mediterranean (2015).

As energy is a fundamental need for people, all type of consumers are concerned by energy regulation. While large consumers or business are able to support their own interests, households are not fully aware of their rights and of the opportunities they would have if they took full advantage of existing regulation. In particular, consumers lack sufficient information and time to get involved in energy issues. Thus, there is an important place that Consumer Associations (CAs) can fill to help regulators be more aware about consumer needs and concerns and to properly inform consumers about the improvement opportunities they have.

Regulators established many programs aiming at raising consumer awareness,, in particular communication campaigns. For instance many regulators consider the periodical bill sent to each household as an effective tool not only to inform about the costs of energy consumption, but also to provide details about the national energy mix (coal, oil, gas, hydro, etc.) or on the latest regulatory provisions that impact on end-users. Electricity bills may also be used to promote energy efficiency, as suggested by the European Directive 27/2012/CE, which encourages European countries to provide households with information about their historical consumption data so to facilitate comparisons among the behavior of consumers classes and finally clearly describe the components of energy costs.

Moreover, many regulators have decided to constantly engage stakeholders and take their view into account in their decision-making processes. Holding periodical hearings, debating public consultation documents, establishing working groups or technical committees on specific issues are all key elements to make regulatory choices more accountable and transparent. It is now time to bring the consumer's voice to these debates on issues that impact on households.

Mediterranean energy regulators consider that dialoguing and arguing with competent stakeholders is an enriching component of a better regulation which helps regulators to better fulfill their mission and also comply with the "Good Regulatory Principles" (2014).

Therefore, MEDREG has decided to collect information on the role and activities of existing consumer associations in the Mediterranean that are dealing with energy issues and to see how regulators interact with CAs at national level.

The following report evaluates the responses to a questionnaire sent to MEDREG members in order to provide an overall picture of CAs in the Mediterranean and to identify possible actions regulators can take to encourage CAs to interact more regularly with the regulatory decision making process.

3. Main Objectives

The Consumer Working Group has carried out this activity with the following goals:

- Provide a general overview of existing Consumer Associations active in the Mediterranean region and dealing with the energy sector. This includes creating a data set with contact details, board members, number of subscribers, budget and its origins.

- Consider the bilateral relationship between Consumers Associations and energy regulators, how they interact, which is CAs current engagement in the regulation.
- Evaluate the expectations and the potential developments of CAs involvement in the development of regulation.

Starting with this analysis, the activity will move on to identify and share best practices that can increase the engagement of Consumers Associations both within MEDREG activities and in the decision-making processes of regulators.

Finally, with a mid-term view, this activity aims at designing a roadmap for the future coordination of Mediterranean Consumers Associations on energy topics and support the establishment of an institutional stakeholder that can provide a single voice for household consumers in the Mediterranean.

4. Methodology

The CUS WG defined a questionnaire, subsequently circulated among all members of the CUS Working Group. The questionnaire was divided in two parts: a general overview and specific data for each national consumer association.

The first part contains twelve questions and aims at identifying the context of consumer associations within the energy sector. This part investigated their legal framework and asked whether these associations regulators have to be formally recognized and, eventually, which are the requirements to be fulfilled.

Then regulators were asked to described the kind of engagement they have presently put in place to involve the Consumers Associations within the regulatory decision making process or to support directly energy consumers.

Furtherly the questionnaire includes questions to collect information on the perceived or expected benefits which may come from stable interactions between regulators and consumers associations.

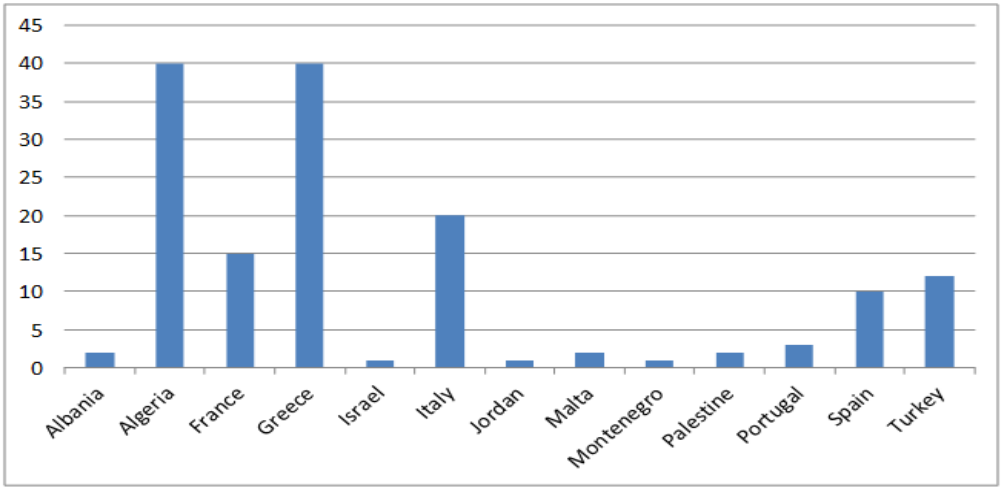
Finally, regulators were asked to provide some potential approaches to increase or enhance the contribution coming from the consumers associations to the regulatory activities.

5. Survey Outcomes

In this first phase of analysis, feedbacks have been sent from 13 members (Albania, Algeria, France, Greece, Italy, Israel, Jordan, Malta, Montenegro, Palestine, Portugal, Spain, Turkey). Although not completed, MEDREG different sub regions are well represented, therefore we can consider that the sample may describe an overall picture.

5.1. Number of CAs

As reported in the figure n. 1, in almost every country some forms of consumers associations are established, largely depending on the relevant population, reaching almost 40 associations in Algeria and Greece.



5.2. Rules to be respected within National legal framework

The second set of information was related to the legal framework for Consumers Association within each country. In general, there are some rules to be respected for constituting an Association. Often, associations dealing with consumers' issues may have specific rules.

In almost all Countries, CAs are recognized by Public Institutions at local and/or national level, and an official register may be held where CAs are listed; an official body may group CAs such as in Italy (CNCU, National Council of Consumers and End-users), France (CNC, National Committee of Consumers), Greece (General Consumer Secretariat), Malta (Consumer Affairs Council), Spain (CCU, Council of Consumers and End Users) and Turkey (Customer Council, Consumer Advertisement Council and Arbitration Committee established by Ministry of Custom and Trade)

There are a number of requirements to be registered such as:

- Compliance to laws, and sometime to the abovementioned specific rules for consumer associations;
- Minimum numbers of members in order to be representative of a significant number of consumers. These minimal thresholds may vary for national (i.e. 25 in Algeria, 10.000 in France, 100 in Greece and Malta) and local associations (i.e. 5 in Algeria and Greece).
- Submission of Founding Act and Statute, to clearly identify the role and the objectives of the association (i.e. Montenegro and Algeria);
- Minimum numbers of years since the CA has been established to interact with mature and well proven associations (i.e. in Italy at least three years);
- To be a no profit organization to be completely devoted to consumers interests, avoiding any provision of services of goods to be delivered;
- Independence from business to avoid any conflicts of interests and to ensure that all actions and positions are taken to support consumers.

In France and Spain, CAs must be certified to be authorized to go to court on behalf of consumers to defend their collective interests and to be allowed to refer to certain jurisdictions (such as Autorité de la Concurrence, Commission des clauses abusives).

Finally, in Malta, both in the governing boards of the Consumer Affairs Council and of the Malta Competition and Consumer Affairs Authority, one member is appointed by government after consultation with CAs.

5.3. Interactions within regulatory processes

In order to explore the real terms of the engagement within decision making process and the overall relationships among Regulators and Consumers Associations, a numbers of items have been asked.

5.3.1. Engaging Consumers in the Regulation

First of all the commitment of CAs to participate is voluntary and not related to a mandatory requirements due to their legal status\requirements to be registered.

Public consultations have been pointed out the main way to involve CAs (67%). It is interesting to highlight that in some countries (i.e. Albania, Spain), public consultations are mandatory when dealing with issues which impacts directly and heavily on consumers such as in tariff setting process.

In these cases, CAs are the main respondents on behalf of households, while it is very rare that a single consumer is able to answer to often complex topics. In other cases, it is up to the regulator to decide if and how to consult.

Focus groups are less used, even if they are considered as a very significant procedure to engage consumers such as France, Spain, Italy (a Permanent Observatory on Regulation has been established where other stakeholders participate to support consulting procedures) and Portugal (CAs are represented within an Advisory Board and a Tariff Board). In Turkey, CAs elect one of the members of Arbitration Committee for Consumer Problems.

A more in deep engagement is carried out considering Regulatory Impact Assessment (RIA) procedures (Italy, Portugal Montenegro), which consists in a systemic approach to critically assessing the positive and negative effects of proposed and existing regulations and non-regulatory alternatives. It is an important element of an evidence-based approach to policy making. Conducting a RIA within an appropriate systematic framework can underpin the capacity of regulators to ensure that regulations are efficient and effective in a changing and complex world.

5.3.2. Information to raise awareness

Since Consumers awareness is a key issue to support households and in particular vulnerable ones, in 50% of our sample CAs devote efforts to inform consumers about their rights, how to realize what they are consuming, more efficient uses of energy (i.e. energy tips) to save money and to adopt a more sustainable and environment- friendly behavior.

A crucial activities of CAs is to handle complaints, for instance concerning bills, bad quality of the services, unfair commercial practices, etc. In many countries (Algeria, France, Greece, Italy, Jordan, Malta, Montenegro, Spain and Portugal) CAs are actively engaged in supporting their subscribers to cope with issues which may arise.

Moreover in Greece, Jordan, Italy, Portugal and Spain most of the CAs have an hot line to support consumers. For instance in Italy, the Regulator has financed the implementation of a network of 14 registered CAs ("Give Voice to Your Right") where consumers may call a free toll number to ask for information or submit complaints. CAs staff members are trained by AEEGSI on most important issue concerning retail market to provide information and support. Moreover AEEGSI has activated an Alternative Dispute Resolution which is totally on line and that allows consumers to be represented by CAs (started in 2013, more than 5.000 dispute have been voluntary solved with this very simple tool.

In Montenegro, CAs inform consumers on their rights through web page over law advices, messages to consumers, publishing appropriate law and specialists advices on different questions;

There is a consistent interaction in sharing data and research to support. In Spain and Italy relevant reports are delivered to CAs concerning topics which may impact on consumers such as retail energy markets. CAs on the other side publish studies on consumers related topics such as services, customer cares, billing, contracting procedures.

5.3.3. Energy prices monitoring and saving

Some CAs have also a watch dog role concerning energy prices, both in regulated and open market to control any market abuse and to support initiatives to reduce tariffs and improve quality of service.

In open markets, in order to support consumers in choosing the most convenient offer, some CAs have developed price comparison tools in Jordan, Italy and Portugal while in Montenegro, Portugal and Italy CAs carry out a continuous monitoring of energy prices.

It is worth to mention some initiatives aiming, especially in open markets, at grouping large numbers of households to ask special offers to the vendors. This may be considered as an important step when opening a market or supporting large numbers of consumers, exploiting regulatory and market knowledge to obtain benefits for households, not perfectly aware of their rights and potentiality. Two main experiences are reported

- In Italy, a CA (e.g. Altroconsumo) has periodically launched a free subscription obtaining significant savings gathering up to 70.000 subscribers which have expressed their no-binding willingness to purchase energy: average savings of 73 euro for power and 200 euro for gas have been recently experienced after a public tender.
- In Spain, two collective switching experiences (performed by OCU and Prizewize), that improved consumer awareness of the switching procedure and available offers. The process yielded an significant participation of almost 600.000 consumers.

5.4. Perception and expectations

As demonstrated above, Regulators often take in great account CAs since they may provide a successful support to enhance and improve the regulatory processes. Actually listening to consumers' needs and expectations improve regulation since it become based on real necessities to obtain lower prices and better quality of services. The regulatory process when based on data and actual needs may be oriented to satisfy consumers and more effective to solve concrete problems. Rumors coming from CAs or consumers may focus NRA' attention to what it's occurring in everyday real life: commercial dispute about bills or unfair behaviors, delayed connection to the grid, unscheduled power interruptions, etc.

Thus more than 80% of regulators consider that suggestions from consumers side to define a better regulation is the main benefit coming from the CAs engagement in the regulatory decision making process. Moreover 60% believes that another benefit is to increase transparency in the decision making process. Also the feedback coming from CAs is believed to be an important results in supporting a fine tuning of regulation

Perceived benefits coming from the engagement of CAs	(%)
1. to receive suggestions from consumer side	83%
2. to include consumers within the decision-making process	58%
3. feedbacks on regulatory decisions	50%
4. to manage complaints	41%
5. to obtain support on specific policies	30%

Regulators have also been asked to highlight which are the main areas of cooperation with CAs. In Albania and Portugal CAs are directly engaged in the tariff setting process, in order to share opinions and to receive suggestions. Public hearings anyway are the most common areas of interactions such as in Italy, Montenegro, Portugal and Spain. Moreover:

- In Algeria, CREG and CAs work together mainly in informing consumers by means of communication campaigns;
- In Italy significant interactions are in the area of consumer care services and complaints handling, such as the above mentioned “Give Voice to Your Rights” and the cooperation on the ADR process which is totally free and web based. The “Permanent Observatory for energy Regulation” and Focus groups are also significant to share opinion and provide suggestion and feedback for a better regulation.
- In Spain and Portugal, CAs mainly cooperate in the price comparison tool which has been achieved by regulators in order to simplify and support the choice of the best supplier according to each consumer’s consumptions.
- In Spain, CAs and CNMC cooperate in complaints handling and in the collective switching that CNMC has strongly supported to improve market efficiency;

It is important to be noted that in two countries (Turkey, Greece and Jordan) there is a reluctant cooperation from CAs side. While the Regulators consider the positive outcomes from a stronger relationships, in these countries CAs do not cooperate as much as desired. In Greece, the Regulator is cooperating mostly with two other Consumer protection Authorities, i.e. “The Consumer Ombudsman” who is responsible to solve conflicts of consumers with private companies and “The Citizen Ombudsman” who is responsible to handle disputes of consumers with public authorities/companies.

5.4.1. Expectations

In order to support more and more in an effective way the regulatory process, regulators generally emphasized that CAs should improve their knowledge about the energy sectors to provide more accurate and aware suggestions. An informed and conscious counterpart is a key issue for an effective and productive dialogue both in defining regulatory provisions and when providing feedback to tune them.

Seldom CAs may find some difficulties in recruiting energy experts on regulatory issues, due to the voluntary features of these organizations. Energy regulation, due its inner complexity and being full of technicalities, requires specific competences and long lasting experiences.

Suggestions coming from the replies to the questionnaires, point out that public hearings, workshops on specific topics, may be important opportunities to explain contexts, scenarios and reasons on which a regulatory decision has been defined or even before the provision is made. This approach increases transparency and may prevent not founded oppositions from stakeholders to ongoing or released provisions.

- In Portugal, the Regulator sets cooperation protocol and MoU with CAs in order to increase the level of expertise of CAs' staff in energy issues;
- In Italy within the aforementioned project “Give Voice to Your Right”, staff members from 14 CAs are trained by AEEGSI on most important issue concerning power and gas retail market to provide information and support to consumers;

Moreover statistical data sharing is believed (Albania, Turkey) to be activities that can enhance CAs engagements.

6. Main Evidences

Considering what MEDREG Members answered to the questionnaire, some evidences come up to identify a general overview of which is the CAs roles and what are the interactions with regulators.

Basically consumers need to protect their own interests with voluntary associations, mainly to cope with companies and sometimes to act in cooperation with Public Institutions, at local and al national levels (in Turkey there are 74 CAs, of which 11 operate at national level). In other countries CAs have local branches to support closer their members.

They are considered fundamental stakeholders since they bring the voice of large numbers of smaller consumers, both small business and households.

There is a growing interest to involve them in the decision making process, such as public hearing and consultations procedures, to collect data and share opinions. At the same time they are considered extremely useful to support a more consistent awareness of consumers to know their rights and to promote fair prices and better quality of services.

Also with local branches or centralized tools (i.e. hot line) they support consumers to handle complaints or instances towards operators, providing a very useful help to less acknowledged and vulnerable consumers.

These important roles may be more and more enhanced with higher knowledge of energy sectors of CAs staff members. More experienced and trained CAs mean an higher level of dialogue, providing two fold benefits in input to be received by regulators and better and more transparent and clear regulatory provisions. Energy sectors are complex and technological systems, with not easily and fully comprehensible items and these may cause barriers to a real cooperative approach.

Training cycles, seminars, workshops may be key options to support a gradual upgrade of CAs energy sectors knowledge. For instance, supporting specific programs could be developed with joint project to support consumers complaints, empowering regulatory expertise of households contracts, or promoting internship stages for CAs junior members.

7. Potential future activities

Since there is a general consensus about the importance of an effective and competent dialogue with final end users, it could be of some interest to pave the way to a more inclusive approach joining CAs and MEDREG activities defining a program which could consists of:

- It could be useful to prepare and share within MEDREG Community **guidelines and recommendations** to promote a better and more efficiently CAs engagement in the regulatory decision making process;
- A further step could relay to complete the survey creating a sort of **database** of CAs which are active within MEDREG countries. Some data have been collected, but more efforts could be done to complete the set of information;

With a view to the next MEDREG Forum, Mediterranean CAs could be involved in an event to discuss about Consumer issues in the energy sector. In that event, a common declaration of a numbers of CAs could subscribe the willingness to regularly meet and discuss on Consumer issues, eventually under MEDREG umbrella signing a Memorandum of Understanding with the aim *to promote and protect consumers rights in the energy sector for reasonable prices, fair commercial practices, energy availability and adequate quality of services.*

ANNEX

1. Questionnaire

General Information	
1	**Are there any organised Consumer Associations (CAs) within your country?**
2	**Are there any status or rules to be respected by CAs within your national legal framework?**
3	**Are CAs recognised by any public institution of your country (e.g., Government, National Regulatory Authority)?**
	Is there any public register?
	Are there any requirements for the Cas in order to be registered\recognised?
4	**Within the regulatory decision making process, is there any kind of engagement of CAs?**
	Regulatory Impact Assessment (ex-ante/ex-post)
	Public consultations (on general/specific issues)
	Public hearings (on periodical basis/ad-hoc for specific issues)
	Focus groups
	Other (specify)
	None
5	**Are there other kinds of engagment of consumers associations, for instance on consumer protection?**
	Information campaigns
	Complaint handling
	Price comparison tools
	Price monitoring
	Sharing of statistical data or researches/studies
	Consumer hotlines
	Other (specify)
6	**Which is the type of committment of CAs to participate (i.e. voluntary, mandatory due to their legal status\requirements to be registered).**
7	**What benefits does your regulator perceive as coming from the engagement of CAs?**
	to receive suggestions from consumer side
	to manage complaints
	to obtain support on specific policies
	feedbacks on regulatory decisions
	to include consumers within the decision-making process
	Other (specify)
8	**What are the fields\topics where cooperation between CAs and the regulator is more intense?**
9	**Provide some concrete examples on how to increase or enhance the level and the quality of the engagement of CAs.**
10	**Provide a description about consumer protection measures currently active in your country that could provide further information on CAs activities.**

Association # 1		
1	**Name of the Consumer Association**	
2	**Year of establishment of the Consumer Association**	
3	**General Information**	
		President
		Address
		Telephone number
		E-mail address
		Number of employees
		Website address
		Number of consumers represented
4	**Legal Status**	
		Officially recognised
		Registered in a 'Public Sector' list (if any)
		Other
		please, specify
5	**Nature**	
		Governmental
		Independent
		Related to a labor union
		Related to a political party
		Other
		please, specify
6	**Funding**	
		Public
		Private (e.g. donations, subscription fees)
7	**Services offered to consumers**	
		General information
		Support in the selection of offers
		Reception, support and management of complaints
		Other
		please, specify
8	**Communication channels**	
		Website
		Call center
		Public events and workshops
		Targeted publications
		Press releases
		Other
		please, specify
9	**Is the consumer association part of a network of similar associations? (*please describe*)**	
		it is part of a national network
		it is part of an international network
		it has targeted partnerships with other sister organizations
10	**Nature of the cooperation with the regulator**	
		Ruled by formal agreements (i.e. MoU)
		Ruled by law
		On a voluntary basis
		Other
		please, specify

2. MEDREG members replies

Q#2 Are there any status or rules to be respected by CAs within national legal framework

Albania	Algeria	France	Greece	Israel	Italy	Jordan	Malta	Montenegro	Palestine	Portugal	Spain	Turkey
Based on the law on customer protection, consumers have the right to be part of different association for the protection of their rights.	Yes (Law relative to associations)	A CA can be certified if it fills the requirements defined by Law and following of the Consumer Code,	They have to fulfiil a number of requirement	yes	Yes	They have to be registered, according to the ministry of social developme nt rules, and monitoring through the ministry of internal	CAs are recognised under the Consumer Affairs Act as "registered consumers associations". These associations have rights and obligations	They have to be registered, according to Law on NGO	There is the Consumer Protection Law No. (21) for the year 2005 and Associations and foundations law	There are no specific status or rules for CAs, but there is a general legal framework for all associations	National Legal framework for associations in general, and additionally for national consumer associations that qualify to represent legally collective consumers interest. Also regional legal requisites could be enforced.	Real or legal persons has the right to form associations without prior permission. CA notify its application document to the local authority.

Q#3 Are CAs recognised by any public institution of your country (e.g., Government, National Regulatory Authority)?

Albania	Algeria	France	Greece	Israel	Italy	Jordan	Malta	Montenegro	Palestine	Portugal	Spain	Turkey
Yes. Ministry of Economy and Trade is responsible for the cooperation with consumer associations. Regulator as well has the duty to consult consumer associations in tariff setting process and other documents to be approved by the regulator regarding consumer rights.	Government	CAs must be certified to be authorized to go to court on behalf of consumers to defend their collective interests, to be represented in jurisdictions such as CNC (national commitee of consumers) and be allowed to refer to certains jurisdictions (such as Autorité de la Concurrence, Commission des clauses abusives)	CAs are recognized by the public authority of the General Consumer Secretariat.	n.a.	Yes, by Ministry of Economic Development.	Yes, by Ministry of Social Developme nt	They are recognized by Consumer Affairs Council as statutory body	Yes	Yes,they are recognized by the government and licenced by Ministry of Interior	Yes	For CAs with a supra-regional scope. They can qualify under certain requirement s as associations that can represent legally collective consumers interests. These CAs can participate in regulatory/n ormative processes.	Yes. Ministry of Interior and Ministry of Customs and Trade

Q# 3.1 Is there any public register?

Albania	Algeria	France	Greece	Israel	Italy	Jordan	Malta	Montenegro	Palestine	Portugal	Spain	Turkey
Association are recorded in the data of the civil court	They must be authorized by Wilayas (administrative circoscription) and by Interior Ministry for National Associations	The approval of the national associations is granted by Minister for Consumer Affairs & Minister of Justice. Approval of local associations is granted by order of the prefect of the department in which the association has its headquarters.	There is a public CAs register maintained under the General Consumer Secretariat	n.a.	A public register of CAs representing consumers at national level is held and periodically updated by the Ministry for Economic Development. Every registered CAs appoints a representativ e in an advisory body established at the mentioned Ministry.	Through out the Ministry of Social Developme nt	Consumer Affairs Council maintains a register of recognized consumer associations	With Ministry of Internal Affairs and Public Administra tion	Yes	No.	Yes. Members of the CCU (Consumers and Users Council).	CAs are represented in Customer Council, Consumer Advertisement Council and Arbitration Committee established by Ministry of Custom and Trade

Q# 3.2 Requirements to be registered

Albania	Algeria	France	Greece	Israel	Italy	Jordan	Malta	Montenegro	Palestine	Portugal	Spain	Turkey
- based on the laws on costumer protection - registration of non profitable organisations	- subject to a declaration and issuance of approval. - The founding members meet in constitutive general assembly to adopt the constitution and appoint the heads of the executive. - This AG is ascertained by bailiff minutes. - The founding members are at least in number: from 10 to 25 (national associations)	- have a year of existence - justify an effective and public activity for the defense of consumer interests) - a number of contributors individually (min. 10,000 for national associations) - independence from all forms of professional activities	- at least 100 founding members - No donations, contributions and payments of any kind from companies/ organizations/ political parties - No advertise in any way - Not having as board members individuals who legal have been convicted. - The board members may not receive any economic compensation, unless to cover expenses.	n.a.	- non-profit - consumer protection as their exclusive purpose; - representative (in terms of number of members at national and regional level); - active for at least three years - Democratic - to keep a list of members - to publish a regular balance sheet. - forbidden to promote or advertise third-parties products or services,	- non-profit - Jordanian nationality	- a minimum of 100 paid up members - non profit making - independent from any other body whose principal object is not consumer protection	- adopt and submit the Founding act and Statute	Need to be licensed by Ministry of Interior	- No	- independency, transparency, - to be a non-prof, with the purpose of defend consumer´s rights, as well as their training and education. - a minimum number of members - A minimum set of activities	- association statutes a approved by the relevant bodies - Listed the number of registered members - to be active consumer organization more than 1 year

Q #4 CAs Engagement within the regulatory decision making process

	Albania	Algeria	France	Greece	Israel	Italy	Jordan	Malta	Montenegro	Palestine	Portugal	Spain	Turkey
Regulatory Impact Assessment (ex-ante/ex-post)						x			x		x		
Public consultations (on general/specific issues)	x		x	x	x	x				x	x	x	x
Public hearings (on periodical basis/ad-hoc for specific issues)	x		x		x	x			x	x	x	x	x
Focus groups			x			x					x	x	
Other (specify)						Observatory for Regulation (composed by CAs and other stakeholders)		A Board member is appointed after consulting CAs. CAs must be consulted when impacting consumers.			CAs are represented in the Advisory Board and the Tariff Board	Consultations are mandatory when Regulation directly impact consumers	

Q #5 Other CAs Engagement within consumers protection

	Albania	Algeria	France	Greece	Israel	Italy	Jordan	Malta	Montenegro	Palestine	Portugal	Spain	Turkey
Information campaigns		x	x	x		x	x		x	x	x	x	x
Complaint handling		x	x	x		x	x	Periodically	x	x	x	x	x
Price comparison tools						x	x				x		
Price monitoring							x		x	x	x		
Sharing of statistical data or studies		x				x	x		x	x	x	x	x
Consumer hotlines				x		x	x			x	x	x	x
Other (specify)						Collective switching	x					Collective switching	brochures and booklets

Q#6 Commitment of CAs to participate

Albania	Algeria	France	Greece	Israel	Italy	Jordan	Malta	Montenegro	Palestine	Portugal	Spain	Turkey
Voluntary	Voluntary	Voluntary	Voluntary	n.a.	Voluntary	Voluntary	n.a.	Voluntary	Mandatory in accordance with Consumer Protection Law No. (21) for the year 2005 and Associations and foundations law	Some on a voluntary basis, some others due to legal requirements (binding).	the CAs must comply with a minimum of activities to register at the Official Register of CAs.	voluntary

Q#7 Perceived benefits

	Albania	Algeria	France	Greece	Israel	Italy	Jordan	Malta	Montenegro	Palestine	Portugal	Spain	Turkey
to receive suggestions from consumer side	X	X	X	X	X	X			X	X	X	X	X
										X			
to manage complaints	X	X			X	X					X		
to obtain support on specific policies	X	X		X	X					X			
feedbacks on regulatory decisions	X			X	X	X				X	X	X	
to include consumers within the decision-making process	X		X		X	X			X		X	X	

Q#8 More intense cooperation's between CAs and NRA

Albania	Algeria	France	Greece	Israel	Italy	Jordan	Malta	Montenegro	Palestine	Portugal	Spain	Turkey
Tariff setting process	Information Campaigns		There is no intense cooperation with CA's , because they are reluctant to cooperate. The Regulator is cooperating mostly with two other Consumer protection Authorities		Public Hearing Focus Groups Observatory for energy Regulation Consumer Information (22 CAs offices to support consumers rights) and ADR	No cooperation		Public hearings, during decision - making process	Tariff issues	Code setting, tariff setting, price comparison tools	Collective switching, Consumer Care Service, Billing, Complaints , CNMC Price Comparison Tool.	Weak Cooperation

Q#9 How to increase\enhance the quality of CAs engagements

Albania	Algeria	France	Greece	Israel	Italy	Jordan	Malta	Montenegro	Palestine	Portugal	Spain	Turkey
Tariff setting process	Information Campaigns		There is no intense cooperation with CA's , because they are reluctant to cooperate. The Regulator is cooperating mostly with two other Consumer protection Authorities		Public Hearing Focus Groups Observatory for energy Regulation Consumer Information (22 CAs offices to support consumers rights) and ADR	No cooperation		Public hearings, during decision - making process	Tariff issues	Code setting, tariff setting, price comparison tools	Collective switching, Consumer Care Service, Billing, Complaints , CNMC Price Comparison Tool.	Weak Cooperation

Q#10 Other information

Albania	Algeria	France	Greece	Israel	Italy	Jordan	Malta	Montenegro	Palestine	Portugal	Spain	Turkey
informing consumers in regard to consumer rights in specific issues			There are no such measures on a global level for the moment. Usually the most active CA's communicate and/or advertise their activities individually.		Some Cas promote collective swtiching Some CAs have set up Price Comparison tools Cas support AEEGSI in Alternative Dispute Resolutions (online)	the CA issues an indicative price list for some types of goods		- informing consumers on their rights through web page over - law advices, messages to consumers, publishing appropriate law and specialists advices on different questions	• Price monitor • product quality • complaints handling of consumers	Price comparison tools developed by Cas in Portugal where set in cooperation with NRA under a specific protocol	-	CAs are member of Consumer Council where. under the coordination of the Ministry, to deal with consumer issues A member elected by CAs is member of Arbitration Committee for Consumer Problems