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EUSurvey

Public consultation on a Communication on the Citizens Energy Package for a Just Transition and Consumer Empowerment

Fields marked with * are mandatory.

Introduction

The Citizens Energy Package for a Just Transition and Consumer Empowerment is linked to the delivery of the Affordable Energy Action Plan. It aims to help make it affordable and easy for all citizens to benefit from the internal energy market and to ensure a just transition that leaves no one behind. This means accelerating the concrete achievement of the Just Transition goals and to implement on the ground the EU rules and policies on consumer empowerment and protection. It thus aims to help not only those citizens who are already engaged, but also the energy poor and vulnerable and in particular consumers for whom energy is a significant part of their cost of living, but who currently lack the capacity to act on energy markets or actively participate in it.

The Package has a three-fold goal: first, it includes measures to enhance the Just Transition principle that no citizen is left behind; it addresses measures tackling energy poverty and supports the complex process of decarbonising coal regions. Secondly, it encompasses a set of actions to facilitate consumer activation, i.e. to promote citizens' participation in energy production and exchange both individually (as prosumers) and collectively through energy communities and energy sharing. Third, it addresses issues that affects all citizens in respect of the energy transition, in particular the need to ensure energy affordability. This implies to ensure public acceptance by citizens, to better inform them, address barriers to affordability, building a mutual trust relationships with suppliers and DSOs, and enhancing the role of local players and initiatives where the energy transition takes place. The feed-back from respondents will be important for the Commission's work to support the smooth and coherent transposition of EU rules on energy consumers through guidance to the Member States.

The Package will also help deliver the Clean Industrial Deal, fulfilling its commitments and promoting flexible market participation that benefits all consumers. It will be closely linked to the electrification and digitalisation strategies with a focus on ensuring that these are delivered in a consumer-friendly way.

This open public consultation together with targeted consultations on the guidance documents aim to ensure a wide understanding and ownership of the whole Package by key stakeholders – regulators, consumer organisations, industry, local and regional administrations, civil society and citizens. This consultation is thus complemented by other consultation fora and processes, such as Citizens Energy Forum and the Regulatory Round Table, outreach events to different types of stakeholders, and working groups on consumers and on energy poverty.

We are very much interested in hearing your views on the Citizens Energy Package as described above.

Thank you in advance for your contribution.

*The following questionnaire consists out of 8 parts. It will start with questions on just transition and energy poverty, after which it will dive into questions on affordability and consumer empowerment and protection. **It is not mandatory to respond to all parts, you are free to respond to those parts that are of interest to you.***

The following topics will be part of the questionnaire

Section 1 on Just Transition and Energy Poverty

1. Questions on just transition, energy poverty and public acceptance
2. On disconnections

Section 2 on Consumer Empowerment

3. On energy communities
4. On active customers and energy sharing
5. On demand flexibility remuneration in retail contracts – dynamic and hybrid contracts

Section 3 on Consumer Protection, Affordability and Public Acceptance

6. On ensuring energy offers are easily understandable and comparable
7. On limiting risk of supplier bankruptcies
8. On consumer protection in natural gas phase-out

About you

* Language of my contribution

English ▾

* I am giving my contribution as

Business association ▾

* First name

Riina

* Surname

Heinimäki

* Email (this won't be published)

riina.heinimaki@energia.fi

* Organisation name

255 character(s) maximum

Finnish Energy

14 out of 255 characters used.

* Organisation size

Small (10 to 49 employ ▾

Transparency register number ⓘ

68861821910-84

* Country of origin ⓘ

Finland ▾

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings ⓘ

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

*

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Section 1 on Just Transition and Energy Poverty

1. Questions on Just Transition and Energy Poverty

01. What priority actions are needed at EU, national and local level to ensure that just transition and consumer rights become concrete throughout all the EU Member States?

5000 character(s) maximum

Just transition and empowerment of consumers can primarily be ensured by effectively implementing the existing legislation and thereby guaranteeing healthy and efficient retail electricity markets across all member states. Energy-poor and other vulnerable customers should primarily be supported through strong social policy.

Furthermore, energy efficiency and demand-side flexibility should be promoted by increasing customer awareness (advice, communication, and information campaigns) as well as by developing technical solutions. Member states can provide financial support to consumers to promote these investments. Financial support (financed by state budget) should be structured so that it does not affect electricity market price formation or distort customers' incentives to save energy or offer demand response when needed.

There is already sufficient regulation on these matters. No new regulation is needed—at most, some guidance on implementation. As already required by existing regulation, all member states should ensure competitive and efficient electricity markets that deliver the products and services customers desire.

Regulation should be enabling, market-driven, and long-term, encouraging suppliers to innovate new solutions and maintaining effective competition in the retail markets. Suppliers' risks should not be increased any further by unpredictable regulatory changes.

Well-functioning competitive retail markets lead to the best result for the consumers. Wide range of products suitable for the customers' differing needs and preference with regards to pricing/risk exposure, flexibility, simplicity, environmental aspects etc. It is important to ensure good prerequisites for the retailers and service providers, such as level playing field, good hedging opportunities, efficient market platforms like data hubs for data exchange.

Recognizing that retail markets function differently across member states, regulations should be adapted to national contexts to avoid disruptions and maintain functional markets. Therefore, we are sceptical to introducing detailed requirements and obligations on European level (e.g. regarding supplier's mandatory contract variety) to sort problems that are of more local or national character.

The retail markets work well in the Nordics. Active competition, customer friendly processes for e.g. switching, broad range of products and services, efficient collection and reporting of consumption data (smart metering, datahub), supplier of last resort-scheme and good level of consumer protection to mentioned as an example.

One way to improve the position of customers is to make billing clearer. EU legislation should be lightened by reducing the mandatory content required on bills, thereby avoiding information overload.

We also cannot overemphasize the importance of smart metering. It forms the foundation for well-functioning electricity markets, energy efficiency measures, and demand response. Smart metering offers many benefits that ultimately serve the customer.

Ensuring a competitive retail market where suppliers can innovate and offer new products and services will benefit consumers by providing more choices and better catering to their needs. Future business and household customers will also be producers, storers, and sellers of energy. The more active the customer is, the more they will benefit from this change. By utilizing price fluctuations in a flexible and intelligent way, consumers support a sustainable energy system and help manage suppliers' risks. Thus, competition in the retail market should be ensured to enable suppliers to innovate and offer new services and products, benefiting consumers, suppliers, and the energy system.

3764 out of 5000 characters used.

02. What are the main challenges to tackling energy poverty in the EU?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
High energy prices	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	Very important	Important	Neutral	Less important	Not important	No opinion
Effective identification of vulnerable and energy poor consumer	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of energy efficiency in housing	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Limited access to renewable energy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Income inequality	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Insufficient awareness and education about energy-saving measures and available assistance programs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inadequate financial support schemes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of political will	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

Inadequate national welfare support systems for poverty in general. A strong social security system is a key factor in why energy poverty has been relatively rare in Finland.

174 out of 2000 characters used.

03. Do you think that, in addition to implementing existing EU legislation, other measures are needed to tackle energy poverty in the EU?

- Yes, new or additional measures (legal or other) are needed at EU level
- No, the focus should be on effectively implementing existing EU legislation on energy poverty with existing tools

04. Would setting mandatory target(s) help Member States address energy poverty?

- Yes
- No

2. On Disconnections

The energy crisis has exposed already energy poor and vulnerable consumers across the internal market to additional higher energy costs, further eroding their ability to continue paying their energy bills. Legislators have then reinforced the existing legislation on disconnections both for the electricity and gas market, asking Member States to take appropriate measures to prevent disconnections for vulnerable customers and customers affected by energy poverty.

As part of the Package, the Commission will publish guidance on transposition of article 28a of the Electricity Market Directive and Article 28 of the Gas Directive Recast which both legislate on protection from disconnection for vulnerable and energy poor customers.

01. What measure or practice do you consider effective to prevent disconnection from electricity or gas of vulnerable customers and customers affected by energy poverty?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Promoting voluntary codes of conduct or a charter for suppliers and customers (<i>arrangements may concern support for customers in managing their energy use and costs, including flagging unusual high energy spikes or use in winter and summer seasons, offering appropriate flexible payment plans, debt advice measures, self-metering readings, and improved communication with customers and support agencies</i>)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting customers' education and awareness (e.g. through one-stop-shops or advisory points)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to finance, vouchers or subsidies	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encouraging and facilitating the provision of meter readings	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Targeted energy tariffs/allowances for vulnerable consumers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Structural measures to address the root causes of energy poverty (e.g., building renovations, energy efficiency measures, access to renewable energy sources, etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please, use this space if you wish to point out other effective measures/practices to prevent disconnection from electricity or gas of vulnerable customers and customers in energy poverty

2000 character(s) maximum

A sustainable solution consists of well-targeted social support for those in need as well as holistic assistance tailored to each life situation. In addition, state-funded financial support for energy efficiency investments can be provided. Social policy allows comprehensive and effective support. Measures can provide direct financial assistance to cover energy costs of energy poor. This approach helps address the root causes of the problem, such as general poverty, and prevents accumulating arrears and debt. Additionally, state-funded support measures can offer long-term solutions, such as energy efficiency, which improve customers' conditions in the long run and reduce consumption.

Identifying vulnerable customers can't be the responsibility of suppliers, as they lack resources to handle the sensitive customer data required for this purpose and don't have a comprehensive understanding of customers' situations. Instead, this shall be the task of social authorities, who have access to needed information and expertise to assist these customers.

When identifying vulnerable customers, several factors must be considered. Definitions with multiple indicators are most effective in ensuring proper coverage, unlike definitions that are based on a single criterion, such as age/family size.

Disconnection ban is not a constructive measure. Disconnection should be a last resort if other measures don't help. Suppliers strive to help customers find solutions to meet their payment commitments (e.g. extending payment deadlines and payment agreements). It is important that customers are advised timely and that they actively engage and commit to addressing the issue.

In addition to advice on paying bills and applying for social support, suppliers can offer guidance on energy efficiency and demand response. Also other stakeholders (authorities and customer organizations) should provide similar advice. The same message should be repeated by different actors across various channels.

Character limit reached.

02. Which actions/measures could be most effective in preventing customers from accumulating debt?
(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Transparency and clear communication about energy consumption, costs, and payment obligations	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regular billing and payment reminders	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Flexible payment plans taking into account the customer's income and expenditure	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Debt counselling or energy efficiency advice to help consumers manage their energy costs and consumption	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Targeted financial support or coverage/ subsidies/ energy cheques provided by local/regional/national authorities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please, use this space if you wish to point out other effective measures/practices to prevent customers from accumulating debt
2000 character(s) maximum

In Finland, all suppliers comply with the general contractual terms negotiated by the industry association with the authorities. According to these terms if the default on payment is caused by financial difficulties that the user has run into because of a severe illness, unemployment, or some other special cause, principally through no fault of his own, the supply of electricity may be cut at the earliest three months after the due date of the payment. The user shall notify the supplier of the reason for the non-payment as soon as he is aware of it and, if possible, before the due date of the invoice.

Suppliers have an obligation to inform customers about the available support mechanisms in their reminders and the warning of cutting the supply of electricity. In these situations above mentioned delayed disconnection process is applied to give the customer time to handle the matter with social services themselves.

In Finland, an electricity supplier can request a security deposit from a customer before a contract if it is evident that the customer is unable to pay their bills. The social services office in Finland pays the security deposit on behalf of the vulnerable customer. Please see: <https://www.kela.fi/yhteistyokumppanit-toimeentulotuki-maksusitoumukset-sahkovakuus>

A disconnection ban is not effective measure. It only worsens the customer's situation and increases their debt. The customer's situation needs to be addressed through social policy measures and aims to solve the root cause. The customer needs comprehensive help, which is not within the expertise of electricity suppliers. Solutions such as supported energy efficiency measures are beneficial, as they improve the customer's conditions in the long term and reduce energy consumption. E.g joint, consistent information campaigns by various stakeholders have effectively influenced large consumer groups.

1906 out of 2000 characters used.

03. Please, share any relevant best practice on protection of vulnerable customers and customers affected by energy poverty from electricity and gas disconnections and from debt accumulation.

5000 character(s) maximum

It is essential that the retail electricity market functions well so that customers get as good offers as possible, based on relevant bidding area wholesale prices. Financial markets must also be liquid and operate efficiently so that retailers are genuinely able to offer customers fixed-price contracts, should customers wish for them.

The four essential factors for increasing competition are moderate market concentration, the close relationship between wholesale and retail prices, the availability of consumer engagement and empowerment tools (e.g. dynamic/hybrid pricing, PCT, awareness programs), and innovation and digitalization (e.g. smart metering, advanced consumption reporting, demand response). The most important thing is, however, strong social policies to support energy-poor and vulnerable customers, allowing the market to operate freely without price regulation.

889 out of 5000 characters used.

Section 2 on Consumer Empowerment

3. On Energy Communities

Energy communities are legal entities that empower citizens, small businesses and local authorities to produce, consume and sell their own energy. These can cover various parts of the energy value chain, including production, distribution, supply, consumption and aggregation. These vary depending on their location, actors and energy services. Energy communities enable citizens to access low-cost renewable energy by owning production installation, and access information on increasing energy efficiency in households – helping consumers gain control of their bills. Energy communities benefit from an EU framework in the Electricity Market Directive (EU) 2019/944 and Renewable Energy Directive (EU) 2018/2001).

01. How can the Commission support the realisation of the objectives of energy communities?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Awareness raising	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Legislation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Capacity building support	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Funding	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

Energy communities, like all market participants, should be treated equally. We see no need or justification for special support for energy communities or energy sharing. Energy communities or energy sharing should be enabled for customers who wish to utilize it, but they should not receive subsidies and should be treated equally with other market participants.

For example, the socialization of costs arising from the use of public infrastructure should be avoided, as asymmetric regulation that shifts costs in favor of customers participating in energy sharing or communities can pose significant risks of cost socialization among other customers, particularly vulnerable customers. Energy sharing within a distributed energy community can therefore only concern electricity sale, not distribution tariffs or taxes.

EU legislation should be simplified. The current directives recognize different types of communities as well as energy sharing. This regulation should be clarified and streamlined. It should be considered whether there is a need to specifically regulate renewable energy communities (RECs), given that there is already sufficient existing regulation regarding citizen energy communities (CECs) and energy sharing.

1242 out of 2000 characters used.

02. Would you find it useful if the Commission provides guidance to the EU Member States on the following:

Maximum 6 selection(s)

- Permitting and licensing
- Access to financing and information
- Access to markets
- Public procurement
- Other
- None of the above

03. Are there any good practices that you think would be useful to highlight in such a guidance?

5000 character(s) maximum

0 out of 5000 characters used.

04. Would you find it useful if the Commission includes a political objective in the Communication in relation to:

(Select topics you agree with)

Maximum 5 selection(s)

- Number of energy communities per municipality
- Total installed renewable energy capacity by energy communities
- Number of citizens engaged in energy communities
- Other
- None of the above

4. On Active Customers and Energy Sharing

With the introduction of a right to energy sharing in the Electricity Market Directive (EU) 2024/1711, households, businesses and public bodies can share self-produced renewable energy directly between each other without the need for a supply license. This practice empowers consumers to collectively operate or use renewable energy systems and access the generated electricity at affordable rates.

01. In relation to energy sharing, would you find it useful if the Commission provides guidance on:

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Data management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Consumer protection	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

	Very important	Important	Neutral	Less important	Not important	No opinion
Single point of contact	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Energy sharing organisor	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Involvement of energy poor and vulnerable households	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

In our view, it is very difficult to create a model and guidelines suitable for all member states. The very different national circumstances should be carefully taken into account. At most, examples and best practices could be shared.

234 out of 2000 characters used.

02. Are there any good practices that you think would be useful to highlight in such a guidance?

5000 character(s) maximum

Energy sharing / communities may need two different contact points:

1. The first is a contact point where customers can get reliable and sufficiently simple information about energy sharing or communities. In Finland, this is a state-owned organization (called Motiva) whose task is to provide energy information to citizens. Motiva already offers a lot of energy advice to citizens.
2. The other question is how the customers are registered in energy sharing schemes or communities and how it is made sure their balance settlement and billing takes energy sharing into account. In Finland the national datahub does the balance settlement and creates billing data so datahub will have a crucial role in managing energy sharing also in Finland. We have not yet discussed whether the customers fill their energy sharing schemes directly to datahub or via DSO or some other way, but in all solutions the datahub will have a central role.

We consider the first one (one stop shop for counseling) especially crucial. National impartial advice and information provision are extremely important to empower customers and promote their activity.

1143 out of 5000 characters used.

03. Do you consider there is a need for an implementing act on data interoperability for energy sharing?

- Yes
 No

5. On Demand Flexibility Remuneration in Retail Contracts - dynamic and hybrid contracts

Demand flexibility should be actively promoted in the retail market with offers that provide lower prices for industries, and consumers who choose to participate. As part of its commitment to energy affordability and flexible market participation, the Affordable Energy Action Plan mandates the Commission to develop guidance for promoting the remuneration of flexibility in retail contracts. This aims to boost consumer engagement by incentivising adjustments in energy usage that align with supply and demand dynamics. To ensure broad participation, it is important that these incentives are clear, understandable, and financially attractive for consumers to opt in. Furthermore, increasing consumer participation involves providing them with a range of choices and equipping them with the necessary tools and information to make educated decisions about their energy behaviour, thereby safeguarding their interests as they navigate an increasingly complex energy market.

01. What do you consider as benefits and challenges regarding the integration of demand flexibility into the retail energy market through flexible supply contracts (e.g., hybrid, dynamic pricing, time-of-use contracts)?

(Please rate according to importance)

Benefits - Challenges	Very important	Important	Neutral	Less important	Not important	No opinion
<u>Benefit:</u> Lower electricity costs for consumers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Benefit:</u> More efficient management of the system and lower prices overall	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Benefit:</u> Better integration of renewable energy sources	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Benefit:</u> Improved grid stability	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Benefit:</u> Increased consumer engagement and awareness, leading to better energy management	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Benefit:</u> Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Challenge:</u> Lack of smart metering infrastructure	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Challenge:</u> Insufficient regulatory framework	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Challenge:</u> Lack of standards or guidelines for dynamic or hybrid energy supply contracts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<u>Challenge:</u> Absence of dynamic or hybrid energy supply contracts	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Challenge:</u> Inconsistent regulatory approaches and national practices across the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Challenge:</u> Other	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Benefit: For 'Other', please specify:

2000 character(s) maximum

0 out of 2000 characters used.

Challenge: For 'Other', please specify:

2000 character(s) maximum

Research results from Finland have shown that clients with a dynamic product are significantly more flexible than other clients when electricity market prices are high and there is a need for demand response. So, the absence of dynamic and hybrid contracts is a major obstacle. Consumers will only be willing to provide flexibility if they have a financial incentive to do so. Therefore, these new contract models are needed. Smart metering is an absolute prerequisite for this.

Ensuring a competitive retail market where suppliers can innovate and offer new products and services will benefit consumers by providing more choices and better catering to their needs.

Utilizing demand response requires a new kind of awareness and understanding from customers. This must be improved through various advisory, communication, and educational means. It is not easy and takes time. Early development should not be undermined by hasty and poorly designed actions or interference with market functioning. The right preconditions for the market to operate must be established first, and then there should be trust that the market will take care of the matter.

1159 out of 2000 characters used.

02. What measures or actions are most important for promoting demand flexibility in retail markets?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Offering financial incentives or rewards for consumers participating in demand flexibility programmes	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Developing user-friendly digital tools and platforms for real-time energy management	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhancing the access to smart meter data and automation to support flexible consumption	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring that the regulatory frameworks support fair remuneration of flexibility and consumer protection	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Providing regular, transparent communication about the benefits and risks of flexible supply contracts, alongside educational campaigns to improve consumer awareness and understanding of such contracts	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilitating collaboration between different stakeholders to ensure an efficient and competitive flexibility market	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

Financial incentives or rewards for consumers participating in demand flexibility programmes must come through commercial agreements and pricing models, not through subsidies.

175 out of 2000 characters used.

03. What measures or commercial practices could be in place to protect consumers from excessive risks associated with price volatility in flexible supply contracts?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Introducing price limits to contain costs during excessive price peak periods	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Offering hybrid contracts that blend fixed and dynamic pricing for balance and predictability	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring availability of 'safety net' features such as guarantees or insurance against price spikes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

	Very important	Important	Neutral	Less important	Not important	No opinion
Promoting access to real-time consumption data through smart meters to enable informed usage decisions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Implementing clear, simple, and accessible contract terms and conditions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Providing comprehensive information of the opportunities, costs and potential risks, and applying techniques to identify final customer's preferences (e.g. risk profile assessment)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Offering comparison tools that help consumers evaluate different contract options	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encouraging the development of risk-sharing mechanisms between consumers and suppliers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

0 out of 2000 characters used.



Section 3 on Consumer Protection, Affordability and Public Acceptance

General questions

01. What actions are needed at EU, national and local level and by whom to raise awareness about consumer protection, rights and opportunities for consumers to engage in the energy transition? Are you aware of any good practices?

5000 character(s) maximum

The most effective measures are those taken at the national level. We do not see a need for EU-level actions. In Finland, there is a long tradition of impartial and free energy advice provided by the stated owned company Motiva. Similarly, consumers are offered free consumer advice regarding contractual matters.

We also have good experience in Finland with national communication campaigns. Joint messaging and communication campaigns by various actors have proven to be very effective. A good example is the "Astetta alemmas" campaign.

The "Astetta alemmas" energy saving campaign was a public information initiative carried out during the 2022–23 heating season, encouraging Finnish households to save energy. The campaign's goal was to prevent a potential crisis situation as the energy situation became unstable following Russia's attack of Ukraine, which began in February 2022. As a result, there was considerable uncertainty about the availability and sufficiency of energy in Finland and across Europe. In December 2022, electricity consumption was 10% lower than during the same period the previous year. Read more: https://www.motiva.fi/ajankohtaista/julkaisut/astetta_alemmas_energiensaastokampanjan_loppuraportti.15370.shtml

1247 out of 5000 characters used.

02. Are there any specific areas (e.g. clarity of energy bills, unfair commercial practices, peer-to-peer trading) where you believe the EU could further focus to increase consumer protection and engagement in the energy market? If so, which areas should be prioritised?

5000 character(s) maximum

There is already sufficient regulation on these matters. We do not need new regulation — at most, some guidance on implementation. The new regulation is not needed, but rather effective implementation of existing rules across all member states.

We also see useful and needed to streamline current billing legislation to reduce the required content of invoices and avoid information overload.

395 out of 5000 characters used.

03. Do you think that additional measures are needed to enhance public acceptance of renewables in the EU?

- Yes, new or additional measures are needed.
- No, existing rules and recommendations are sufficient and it is more important to focus on their implementation.

04. What type of interventions would be more effective in involving citizens and enhancing public acceptance of renewables in your view?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Indirect financial participation (benefit sharing) e.g. job creation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Direct financial participation e.g. buying stakes in the project, financing for local communities (municipalities, citizens)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting communities' participation in renewable energy projects e.g. through the inclusion of measures to foster public acceptance in renewables auctions criteria	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Communication measures e.g. education and information campaigns	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Early engagement of citizens and involvement in the decision-making process	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

0 out of 2000 characters used.

05. What do you believe are the main retail challenges for affordable energy in your Member State?

Maximum 3 selection(s)

- High retail prices
- Limited access to renewable energy options
- Lack of (competitive) offers
- Lack of access to smart solutions (e.g. smart meters, smart appliances and/or aggregators)
- Lack of information or awareness about energy-saving options
- Other

For 'Other', please specify:

2000 character(s) maximum

The price level of electricity in Finland is reasonable, primarily due to effective competition.

96 out of 2000 characters used.

6. Ensuring energy offers are easily understandable and comparable

Due to the increasing complexity of energy offers, consumers often find it difficult to fully understand the implications of suppliers' offers. Therefore, they should be provided with a summary of the key contractual terms and conditions in a prominent manner and in clear and concise language. The European Commission was tasked to provide guidance to Member States on a summary of the key contractual terms and conditions in both electricity and gas markets.

01. What are the key principles that should guide the presentation of energy offers to ensure consumers receive all necessary information in a user-friendly format and in a timely manner?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Clear and simple language	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Visually appealing design and layout	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Timely presentation of information	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Easy comparison of different energy offers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Personalization of information to individual consumer needs	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Accessibility of information across different communication channels	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Use of concise and straightforward terminology	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

Terminology can only be harmonized at the national level at most. Even then, it has proven to be challenging. The risk with any kind of harmonization is the potential to hinder innovation.

188 out of 2000 characters used.

02. Which is the most important information on an energy offer that should be prominently displayed to consumers?

	Most important information on an energy offer?
1	and clarification on whether the price is fixed, variable, or dynamic
2	day right of withdrawal, if applicable to the contract
3	The duration of the contract and the terms of termination
4	Billing terms, including billing frequency, billing address/method
5	The company's contact details for consumer service

03. Have you identified good practices regarding a summary of key contractual terms and conditions and/or other tools providing consumers with information on energy offers in a user-friendly format allowing easy comparison? Please elaborate.

5000 character(s) maximum

The required summary of key-contractual terms & conditions as pre-contractual information as set out in article 11, 1a should be limited to the information set out in the corresponding electricity supply contract. It must be a concise summary of only the most relevant contractual aspects to help consumers understand their contract at first glance. Elements that are not part of the contract should not be required to be mentioned in the summary to avoid information overload and unnecessarily elongating the summary. This would otherwise run counter to the underlying idea of a summary of a lengthy electricity supply contract.

A summary can be designed in an indefinite number of ways. It should be left to suppliers to decide how to design their summaries. The design and layout are unique selling points that distinguish suppliers in their competitive offers and customer experience.

In Finland the national supplier association and the national Consumer Authority have jointly prepared a recommendation for the industry on a summary of the essential contractual information:

Recommendation by Finnish Energy and the Consumer Ombudsman on key contract terms:

Electricity sales and supply

- Start date of the contract and delivery
- Information regarding the consumer's 14-day right of withdrawal, if applicable to the contract
- Product name and price or the basis for determining the price
 - o Clarification on whether the price is fixed, variable, or dynamic
 - o If applicable, details of any agreed offers or discounts
- The company's email address and contact details for consumer phone service
- Duration of the contract and terms regarding termination
 - o It must be mentioned if there is an agreement that differs from the right to terminate a fixed-term contract due to the user's move as per general terms of contract
- Billing terms, including billing frequency, billing address/method
- Agreed communication channel for price or contract term change notifications
 - o If the communication method is electronic, the method is specified, such as a known email or the company's online channel, with a note that the communication method can be changed to paper at no charge upon request.
 - o When using an electronic service, information is also provided on how the user will be notified of the existence of the notice in the electronic service.
- Details of any agreed additional services, if applicable (at least the name, price, and terms regarding duration/termination)

2502 out of 5000 characters used.

7. On Limiting Risk of Supplier Bankruptcies

'Supplier Hedging' relates to the purchasing strategy of suppliers on the wholesale market. When suppliers do not ensure that their electricity portfolio is sufficiently hedged, changes in wholesale electricity prices can leave them financially at risk and can result in their failure and them passing on costs to consumers and other network users. Hence, suppliers should be appropriately hedged when offering fixed-term, fixed-price electricity supply contracts. In short, suppliers need to buy the electricity provided to you sufficiently in advance to protect against price hikes.

Article 18a of Directive 2024/1711 aims to ensure that National Regulatory Authorities enforce that suppliers have in place and implement appropriate hedging strategies.

01. Which elements of article 18a EMD are important to clarify further?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Definitions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Legal implementation Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Implementation/enforcement National Regulatory Authorities	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	Very important	Important	Neutral	Less important	Not important	No opinion
Further considerations on types of risks for suppliers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Best practices by NRAs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Any other elements or comments you think are important to highlight? Please elaborate.

2000 character(s) maximum

The right for a supplier to choose hedging products is one of the basic characteristics of a free market. Mandatory detailed hedging requirements/tools are restricting the retail competition and business models of suppliers rather than benefiting customers. Hedging strategy is part of the differentiation factors between suppliers and their ability to offer competitive offers and hedging strategies vary between suppliers. The party, whose risks are involved, must be free to decide the hedging tools that are most suitable without the authorities specifying the use of certain instruments. Normalizing, even partially, the hedging strategies would undermine competition, lower the diversity of offers, reduce suppliers' ability to optimize their sourcing based on sound knowledge of their own portfolio and, in the end, be detrimental to consumers.

To ensure suppliers' resilience, protect consumers and reduce costs, measures can be

- Enhanced regulatory oversight: Strengthening the cooperation between energy and consumer authorities to prevent and correct potential abuses in a timely manner
- Stress tests: Introducing stress tests can ensure suppliers are capable of handling significant market changes and maintaining their resilience, and keep market competition healthy
- Developing hedging opportunities: Rather than imposing hedging obligations, focus should be on removing obstacles to efficient hedging for suppliers (e.g. ensuring access to necessary financial instruments)
- Nationally tailored regulations: Regulations shall be adapted to national contexts to avoid disrupting retail markets. We are skeptical about introducing detailed EU-level requirements to sort national problems
- Encouraging innovation: Ensuring a competitive retail market where suppliers can innovate and offer new products will benefit consumers and the whole energy system. By flexibly and intelligently using price fluctuations, consumers support a sustainable energy system and help manage risks

 1998 out of 2000 characters used.

8. On Consumer Protection in Natural Gas Phase-out

Phasing out the use of natural gas in the household sector may be part of national, regional or local energy transition plans. If this is the case the consumers and especially energy poor and vulnerable consumers, need to be protected and supported to ensure that they do not suffer negative consequences. In accordance with the requirements of article 27 of the recast EU Directive on gas and hydrogen markets (2024/1788), the Commission is preparing guidance on principles and good practices that would apply after a decision has been made, in order to make the process of a natural gas phase-out consumer-focused, just and inclusive.

01. What are the main concerns for households when phasing-out natural gas?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Lack of alternatives to natural gas for heating and cooking	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Higher energy bills	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of financial resources to invest in alternative heating sources	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Complexity of access to funding or financing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	Very important	Important	Neutral	Less important	Not important	No opinion
Inconvenience of works for renovation and/or installation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Uncertainty/absence of national/regional/local plans and timelines for phasing out natural gas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of information on plans and concrete actions to take	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
No availability of companies or workers for the installation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Difficult to take action for a rented home	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Difficult to take action in a multi-apartment building	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

0 out of 2000 characters used.

Please use this space if you wish to elaborate on the main concerns you have identified (explanations, suggestions, etc.)

2000 character(s) maximum

0 out of 2000 characters used.

02. What types of support will be essential for citizens, notably vulnerable customers and customers affected by energy poverty, to assist them in the phase-out of natural gas in their homes?

	Very important	Important	Neutral	Less important	Not important	No opinion
Clear and comprehensive information (what to do)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Practical advice (how to do it)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Financial advice (how to pay for it)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Financial support (grants, subsidies, loans, etc)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fully developed packages of solutions (someone does it for you)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support to bundle individual projects for joint purchasing or contracting (do it together to get a better deal)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

0 out of 2000 characters used.

03. Do you know of best practice examples where natural gas has already been phased out with a focus on consumers such as by involving consumer collectives, consumer organisations, national or local administrations, energy regulatory authorities, or other

local actors? If yes, please describe briefly.

3000 character(s) maximum

0 out of 3000 characters used.

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