

Open Public Consultation on the Evaluation of Directive 2008/48/EC (Consumer Credit Directive - CCD)

Fields marked with * are mandatory.

Introduction

The development of a deeper and fairer single market is one of the European Commission's key priorities. As part of this objective, the European Commission is working on facilitating consumers' access to good quality financial services offered outside their Member State. Regarding consumer credit in particular, the [Directive 2008/48/EC](#) of the European Parliament and of the Council of 23 April 2008 on credit agreements for consumers ("The Directive") has been adopted to encourage cross-border credit agreements while ensuring high protection standards for consumers.

With the [2016 Consumer Finance Action Plan](#), the Commission set out different actions to improve the consumer experience in the field of financial services. It also announced that it would work to facilitate cross-border access to consumer credit and explore ways to achieve common standards for creditworthiness assessment and credit data registers.

The Directive guarantees consumers the right to withdraw from the credit contract within 14 days, the right to early repayment of the credit, and imposes on credit providers an obligation to perform a creditworthiness assessment prior to the conclusion of the agreement. It also ensures that all consumers across the European Union receive standard, easily comparable pre-contractual information regarding the main features of credit offers.

Since 2008, several other EU pieces of legislations have been adopted in the field of mortgages, data protection, anti-money laundering and payment services and which are also relevant for the provision of consumer credit.

Ten years after its adoption, the European Commission is launching a second Evaluation to assess whether the Directive is still fit for purpose given all the market developments that have occurred since 2008. A first Evaluation, carried out in 2014, highlighted the need to improve the compliance of credit providers with the obligations stemming from the Directive so that consumers can make effective use of their rights.

This public consultation is an opportunity for consumers, professionals in the field of credit, national authorities and any other stakeholder interested to interact with the European Commission by giving opinions on the functioning of the Directive. The results of this consultation will help the European Commission assess the coherence, effectiveness, efficiency, relevance and EU added value of the Directive.

The consultation consists of short questionnaires, one for general public (Part I) and another (Part II) for other stakeholders (associations, authorities, credit providers etc.).

You may answer the open questions in this questionnaire in any of the 24 official EU-languages.

Opinions gathered through the open public consultation will directly feed into the evaluation, by providing useful elements to answer the evaluation questions. A summary of all consultation activities, including a specific one for the open public consultation, will be included in the Staff Working Document that will be produced to summarise the findings of the evaluation.

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- Gaelic
- German
- Greek
- Hungarian
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union

Other

* First name

* Surname

* Email (this won't be published)

* Scope

- International
- Local
- National
- Regional

* Organisation name

255 character(s) maximum

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

* Country of origin

Please add your country of origin, or that of your organisation.

- | | | | |
|-------------------------------------|--|-------------------------------------|--|
| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Samoa |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> San Marino |

- American Samoa
- Andorra
- Angola

- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia

- Aruba
- Australia
- Austria

- Azerbaijan
- Bahamas
- Bahrain

- Bangladesh

- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda

- Bhutan

- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory

- Egypt

- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Ethiopia

- Falkland Islands
- Faroe Islands

- Fiji
- Finland
- Former Yugoslav Republic of Macedonia
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau

- Macau

- Madagascar
- Malawi

- Malaysia
- Maldives
- Mali

- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar /Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua

- São Tomé and Príncipe
- Saudi Arabia
- Senegal

- Serbia
- Seychelles
- Sierra Leone

- Singapore
- Sint Maarten

- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Swaziland
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand

- British Virgin Islands
- Brunei
- Bulgaria

- Burkina Faso
- Burundi
- Cambodia

- Cameroon
- Canada
- Cape Verde
- Cayman Islands

- Central African Republic
- Chad
- Chile

- China

- Christmas Island
- Clipperton
- Cocos (Keeling) Islands

- Colombia
- Comoros

- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba

- Curaçao

- Cyprus

- Czech Republic

- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Niger
- Nigeria
- Niue
- Norfolk Island
- North Korea
- Northern Mariana Islands
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia

- Democratic Republic of the Congo
- Lesotho
- Saint Lucia
- Zimbabwe
- Denmark
- Liberia
- Saint Martin

***Publication privacy settings**

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

- Anonymous**
Only your type, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.
- Public**
Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

* I agree with the [personal data protection provisions](#)

Part I- Questionnaire for general public

If you do not reply as general public, please go to Part II

Question 1. Do/did you hold or have you tried to obtain any of the following credits (i.e. loans not secured by a collateral like mortgages), of a value between EUR 200 and EUR 75 000 in the past five years?

	Hold a credit	Tried to obtain a credit
Authorised overdraft (agreement that consumer can borrow money if there is no money left on account)	<input type="checkbox"/>	<input type="checkbox"/>
Personal credit	<input type="checkbox"/>	<input type="checkbox"/>
Open-end credit (pre-approved loan that can be used up to a certain limit)	<input type="checkbox"/>	<input type="checkbox"/>
Credit card	<input type="checkbox"/>	<input type="checkbox"/>
Store card (card that can only be used in a given shop or chain of shops, allowing for discounts)	<input type="checkbox"/>	<input type="checkbox"/>
Store/catalogue/mail order instalment credit	<input type="checkbox"/>	<input type="checkbox"/>
Car loan	<input type="checkbox"/>	<input type="checkbox"/>
Student loan	<input type="checkbox"/>	<input type="checkbox"/>
Home collected credit (cash credit collected at home)	<input type="checkbox"/>	<input type="checkbox"/>
"Pay-day loan" (short term and small value credit)	<input type="checkbox"/>	<input type="checkbox"/>

Question 2. Have you ever tried obtaining a credit from a credit provider based in another country?

at most 1 choice(s)

- Yes
- No

Question 3. If you answered no to the previous question, was it because:

between 1 and 5 choices

- You are satisfied with the products and conditions offered in your country /area
- You are unsure about your rights or where to turn to get redress in case of a problem
- You feel more confident in dealing with a credit provider that uses the same language as you
- You prefer face-to-face contact
- You tried but could not obtain (e.g. because of geographical restrictions) the credit offers available in other countries

Other (*please specify*)

Question 4. As regards your most recent credit, which of the following was the credit provider?

at most 1 choice(s)

- Your bank (the bank where you had an account)
- Another bank (a bank you have not been a customer of before taking the credit)
- Non-bank financial institution (e.g. payday lending companies, businesses offering hire-purchase agreements like a vehicle dealership)
- Other lender (e.g. store seller of a good)

Other (*please specify*)

Question 5. Was the process of getting this credit carried out:

at most 1 choice(s)

- Entirely offline (e.g. at the bank's premises or in a shop)?
- Entirely online?
- Both online and offline (e.g. online at the beginning but then the finalisation of the process occurred offline)?

Question 6. Was this credit provider operating from the country you live in or from another country?

at most 1 choice(s)

- The country you live in

- Another EU country
- Another non-EU country

Question 7. Before taking out a consumer credit, did you compare offers from different credit providers?

at most 1 choice(s)

- Yes
- No

Please specify, if applicable, how many offers did you compare:

Question 8. When looking for your most recent credit, how important were the following factors for you?

	Very important	Somewhat important	Not important	Do not know
Who the credit provider is	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Where the credit provider is located	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The total amount of the credit	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Annual Percentage Rate of Charge (APR) i.e. the total cost of the credit to the consumer, expressed as an annual percentage of the total amount of credit	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The duration of the credit	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The amount and number of monthly payments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The interest rate applicable	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The extra charges	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The advice provided by the credit provider	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify if there are other factors which were important for your choice:

Question 9. Which of the following sources have you used when investigating options for a credit product?

between 1 and 14 choices

- Visit to a bank branch
- Bank websites
- Online lending provider websites
- Consumer organisation websites

- Search engines (e.g. Google)
- Comparison websites
- Information provided by phone
- Government websites
- Newspapers
- Leaflets
- Internet advertisements
- Television advertisements
- Radio advertisements
- Recommendation from family or friends

Other (*please specify*)

Question 10. Have you ever come across advertising for consumer credit?

	Yes	No
In print media	<input type="radio"/>	<input type="radio"/>
On the radio	<input type="radio"/>	<input type="radio"/>
On television	<input type="radio"/>	<input type="radio"/>
Online	<input type="radio"/>	<input type="radio"/>

Question 11. If you answered yes to the previous question, what did you think of the information contained in the advertising?

at most 1 choice(s)

- There was sufficient information to understand the main credit features
- There was too much information provided
- There was not enough information provided
- I did not pay attention to the information provided

Please specify

Question 12. Thinking of your interaction with the credit provider of your most recent credit, did he/she give you any explanations on the different types of credits available?

at most 1 choice(s)

- Yes, the credit provider explained what type of credit (duration, amount of monthly instalments, total credit costs) would be best for my situation
- Yes, the credit provider presented different types of credit, but did not explain which would be best for my situation

- No, the credit provider presented only one type of credit
- I chose the credit online, on my own

Other (*please specify*)

Question 13. Did you know that according to the applicable legislation, the credit provider or intermediary has to provide you with standardised pre-contractual information (“Standard European Consumer Credit Information” – SECCI) in good time before the signature of the contract?

at most 1 choice(s)

- Yes
- No

Question 14. Do you remember when precisely you received the SECCI related to the last credit you have obtained?

at most 1 choice(s)

- Yes, well in advance before signing the contract
- Yes, but I was only given the form together with the other Terms and Conditions, right before signing the contract
- Yes, but I received it after signing the contract
- I do not remember receiving the form
- No, I have not received the form

Question 15. Was the time to read and fully understand the information included in the standardised pre-contractual information (“Standard European Consumer Credit Information” – SECCI) form sufficient?

at most 1 choice(s)

- Yes
- No

Please specify

Question 16. Was the information included in the standardised pre-contractual information (“Standard European Consumer Credit Information” – SECCI):

	Totally agree	Somewhat agree	Somewhat disagree	Totally disagree	Don't know
Easy to understand (clear and simple language)	<input type="radio"/>				
Concise	<input type="radio"/>				
Well presented	<input type="radio"/>				

If you answered "somewhat disagree" or "totally disagree" to the previous question, what were the main problems you encountered?

Question 17. Are you familiar with the Annual Percentage Rate of Charge (APR) i.e. the total cost of the credit to the consumer, expressed as an annual percentage of the total amount of credit?

at most 1 choice(s)

- Yes
- No

Question 18. Do you consider the APR easy to understand?

at most 1 choice(s)

- Yes
- No

Question 19. Did the credit provider verify whether you would be able to repay the credit?

at most 1 choice(s)

- Yes
- No
- Don't know

Question 20. What type of information were you asked (orally or in writing) about?

between 1 and 6 choices

- Composition of your household
- Professional status
- Income
- Income of your spouse
- Household expenses
- Other outstanding credits

Other *(please specify)*

Question 21. What type of documents did the credit provider request in order to check the information above?

between 1 and 4 choices

- My last salary slip
- My last tax declaration
- My bank account's balance statement
- I did not have to provide documents, I just had to fill a questionnaire

Other *(please specify)*

Question 22. Has the credit provider told you whether he/she will check other source of information (e.g. credit registers/databases) beyond those you provided?

at most 1 choice(s)

- Yes
- No

If yes, please specify which ones:

Question 23. Since you took out the credit, have you made any attempt to:

	Yes	No	It was not necessary
Withdraw from the contract within 14 days period	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Make early repayment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Replace several credits by a single one	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Re-arrange schedule or amounts of repayments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Change type of interest rate	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you did encounter specific problems in exercising these rights, please specify:

Question 24. Looking back, do you feel that the conditions of the credit were adapted to your needs?

at most 1 choice(s)

- Yes
- No

If no, please specify:

Please explain your responses and/or mention other relevant provisions:

Question 25. How would you rate the benefits flowing from the various provisions of the Directive?

	Very beneficial	Somewhat beneficial	Not beneficial	Do not know
Information to be included in advertising	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pre-contractual information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Annual Percentage Rate of Charge (APR - the total cost of the credit to the consumer, expressed as an annual percentage of the total amount of credit)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Standard European consumer credit information form (SECCI)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contractual information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Right of withdrawal	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Right of early repayment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Creditworthiness assessment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your responses or mention other relevant provisions:

Part II. Questionnaire for other stakeholders

Questions on relevance

Relevance looks at the relationship between the needs and problems in society and the objectives of the Directive. It also requires a consideration of how the objectives of Directive correspond to wider EU policy goals and priorities.

Question 1. Do you consider that the following developments have changed the provision of consumer credit since 2008?

	Totally agree	Somewhat agree	Somewhat disagree	Totally disagree	Do not know
Digitalisation (integration of technology in financial services leading to an increased use of smartphones, internet and on-line tools)	<input type="radio"/>				
Profiling of consumers based on personal data	<input type="radio"/>				

New market players (such as crowdfunding platforms or SMS-loans providers)	<input type="radio"/>				
Caps on interest rates	<input type="radio"/>				
Competition at national level	<input type="radio"/>				
Competition on a cross-border basis	<input type="radio"/>				

Please mention, if any, other developments which you consider important:

Question 2. How relevant do you consider the following provisions of the Directive in light of its objectives?

	Totally relevant	Somewhat relevant	Somewhat irrelevant	Totally irrelevant	Do not know
Scope (loans between EUR 200 and 75 000)	<input type="radio"/>				
Information to be included in advertising	<input type="radio"/>				
Pre-contractual information	<input type="radio"/>				
Annual Percentage Rate of Charge (APR - the total cost of the credit to the consumer, expressed as an annual percentage of the total amount of credit)	<input type="radio"/>				
Standard European Consumer Credit Information – SECCI	<input type="radio"/>				
Right of withdrawal	<input type="radio"/>				
Right of early repayment	<input type="radio"/>				
Creditworthiness assessment	<input type="radio"/>				

Please specify:

Question 3. Are there any issues which the Directive currently does not address but you consider should be addressed?

at most 1 choice(s)

- Yes
- No
- Don't know

If you answered “yes”, please specify:

Questions on effectiveness

The evaluation criterion of effectiveness considers how successful EU action has been in achieving or progressing towards its objectives, in this case:

- creating a single market for consumer credit while ensuring a high level of consumer protection and
- achieving a level playing field for consumer credit across the EU and enhancing cross-border credit

Question 4. How do you rate the effectiveness for consumer protection of the following elements/ features of the Directive?

	Very Effective	Somewhat effective	Somewhat ineffective	Very ineffective	Do not know
Information to be included in advertising	<input type="radio"/>				
Pre-contractual information	<input type="radio"/>				
Standard European consumer credit information form - SECCI	<input type="radio"/>				
Contractual information	<input type="radio"/>				
Right of withdrawal	<input type="radio"/>				
Right of early repayment	<input type="radio"/>				
Annual Percentage Rate of Charge (APR - the total cost of the credit to the consumer, expressed as an annual percentage of the total amount of credit)	<input type="radio"/>				
Creditworthiness assessment	<input type="radio"/>				

Please specify:

Questions on efficiency

When deciding to introduce a sector-specific regulation, the EU faces the challenge of balancing the potential benefits of such a regulation against the potential costs of such a regulation. For the Directive, these costs include direct costs incurred by the credit providers (compliance and administrative costs), national authorities (enforcement costs) as well as other businesses involved in the distribution and granting of consumer credit.

Question 5. How would you rate the costs flowing from the various provisions of the Directive?

	Very costly	Somewhat costly	Not costly	Do not know
Information to be included in advertising	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pre-contractual information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Annual Percentage Rate of Charge (APR - the total cost of the credit to the consumer, expressed as an annual percentage of the total amount of credit)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Standard European consumer credit information form - SECCI	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contractual information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Right of withdrawal	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Right of early repayment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Creditworthiness assessment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify:

Question 6. How would you rate the benefits flowing from the various provisions of the Directive?

	Very beneficial	Somewhat beneficial	Not beneficial	Don't know
Information to be included in advertising	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pre-contractual information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Annual Percentage Rate of Charge (APR - the total cost of the credit to the consumer, expressed as an annual percentage of the total amount of credit)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Standard European consumer credit information form - SECCI	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contractual information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Right of withdrawal	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Right of early repayment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Creditworthiness assessment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify:

Question 7. Overall, do the benefits of the Directive outweigh its costs?

at most 1 choice(s)

- Yes
- No
- Don't know

Please specify:

Question 8. Are there any areas in the Directive where there is room for simplification or reduction of your costs?

at most 1 choice(s)

- Yes
- No

If yes, please specify:

Questions on coherence

The evaluation of coherence involves looking at how well or not different actions work together. In the case of the CCD, there are a number of other EU legislations and policies in different fields (for example on mortgages, data protection, anti-money laundering and payments services), which, while they do not directly regulate consumer credit, may affect the consumer credit market.

Question 9. To what extent is the Directive coherent with other EU legislation:

	Very coherent	Somewhat coherent	Somewhat incoherent	Very incoherent	Do not know
Mortgage Credit Directive (MCD)	<input type="radio"/>				
Unfair Commercial Practices Directive (UCPD)	<input type="radio"/>				
Payment Services Directive (PSD2)	<input type="radio"/>				
General Data Protection Regulation (GDPR)	<input type="radio"/>				
Unfair Contract Terms Directive (UCTD)	<input type="radio"/>				



Please specify and/or mention other pieces of EU legislation interacting with the Directive:

Question 10. Are you are aware of any contradictions/overlaps/inconsistencies /missing links between the Directive and other national legislation in the Member States? If so, which ones?

at most 1 choice(s)

- Yes
- No

If yes, please specify:

Questions on EU added value

In any policy initiative, the Commission must consider whether there is added value in EU intervention i.e. whether certain issues should be regulated at EU level or should be left for possible regulation at the Member State level.

Question 11. In your view, what is the added-value delivered by the CCD and its implementation, over and above what could reasonably have been expected from national legislation in the Member States alone?

at most 1 choice(s)

- Better consumer protection
- Better functioning of the internal market
- Legal clarity
- Help addressing cross-border problems

Other (please specify):

Question 12. Should the following different aspects remain regulated at EU level?

	Fully agree	Somewhat agree	Somewhat disagree	Fully disagree	Do not know
Information in advertising	<input type="radio"/>				
Pre-contractual information	<input type="radio"/>				
Standard European consumer credit information form - SECCI	<input type="radio"/>				

Contractual information	<input type="radio"/>				
Annual Percentage Rate of Charge (APR - the total cost of the credit to the consumer, expressed as an annual percentage of the total amount of credit)	<input type="radio"/>				
Right of withdrawal	<input type="radio"/>				
Right of early repayment	<input type="radio"/>				
Creditworthiness assessment	<input type="radio"/>				

Please specify:

Other questions

Question 13. Are there any other issues not falling within the remit of the above questions that might require action at EU level you wish to raise? What would be your preferred solution to the identified issue?

You are invited to upload a document to support your answers.

Please feel free to upload a concise document, such as additional evidence supporting your responses or a position paper.

Please note that the uploaded document will be published alongside your response to the questionnaire which is the essential input to this open public consultation. The document is an optional complement and serves as additional background reading to better understand your position.

The maximum file size is 1 MB
Only files of the type pdf,txt,doc,docx,odt,rtf are allowed