

Management has many aspects with many challenges. The goals remain but the solutions are improved. The first volume of this book collected 12 answers of young researches in four main topics. This volume focuses on strategic, market, human and management system issues. The book highlights some actual and interesting issues of the authors' research activity, including theoretical and empirical results. The authors are: Ádám Bereczk (University of Miskolc), Bálint Blaskovics (Corvinus University of Budapest), László Berényi (University of Miskolc), Csilla Margit Csiszár (University of Miskolc), Nikolett Deutsch (Corvinus University of Budapest), Noémi Hajdú (University of Miskolc), Katalin Lipták (University of Miskolc), Róbert Marciniak (University of Miskolc), Éva Pintér (University of Pécs), Bernadett Szolnoki (University of Miskolc).

Management Challenges. Volume II



László Berényi (Ed.)

Management Challenges in the 21st Century. Volume II

Further challenges



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CHAPTER 6.

INSTITUTIONAL MODELS OF CONSUMER PROTECTION

Csilla Margit Csiszár

INTRODUCTION

At the beginning of the third millennium the consumer protection and its challenges are gaining in importance at a global level. Institutions play a fundamental role in the consumer protection system, because they not just allow, but they also help in communication between consumers, companies, and other authorities at national level, and in the European Union, too.

The establishment of the consumer protection institution system is a very complicated process in each country. It can be realized mainly in a very complex structure, therefore no identical and exactly comparable systems can be found. According to the view of the new institutional economy the quality of the institutional system is more important in the case of economic growth, than the technological development, or the accumulation of the factors (Czeglédi, 2006).

Main aim of this capital is the systematic analysis of the European consumer protection related to the activities of the institutional structures, and the presentation of the characteristics of different countries. The methodology of this analysis is on the one hand the categorisation of the national consumer protection organisations' lists, on the other hand carrying out correlational investigation. The results of the research will be shown on country maps. The initial assumption of the research is that the institutional system of the consumer protection in the countries of the European Union has a different structure. The administration system and the functional view can establish a secure basis for the analysis and for the comparative study of the institutional structure.

INSTITUTIONAL MODELS

The analysis of the consumer protection institutions can be primarily initiated by institutional models of the administrative and judicial system, because the institutions belong to these systems. The authorities tend to operate within the governmental administration.

The administrative structure of the European Union shows a large variety. During the analysis of the administrative systems, mostly the following models can be applied (Balázs et al., 2011).

- English model: there is no significant differentiation between the public weal and the private affairs. More attention is drawn to increased efficiency, and the rationality is of importance. The control is based on the courts' justifications. The local governments operate independently, separated from the hierarchic administration. The central authorities have no local bureaus. The tasks of the ministry are handled by the local authorities as a favour, or they get some compensation. Typical countries: United Kingdom, Ireland, Cyprus, Malta.
- French model: centralized administration, law is part of the public administration. Typical countries: France, Belgium, Luxemburg, Greece, Italy, Portugal, and Spain.
- German model: function of chancellery, indirect administration related to the federalism, monitoring of local governments by each other, and judicial control are observable. Typical countries: Denmark, Sweden, Finland, Norway, Netherlands.
- Scandinavian model: special geographical position, and the fact that the engagement of the state and the administration are very similar to each other. Typical countries: Denmark, Sweden, Finland, Norway, Netherlands.
- East-Central European model (former communist states): public administration is affected by the socialist past. After the fall of communism, the reconstruction of administration took more time, and also the effect of EU appeared. Typical countries: Bulgaria, Czech Republic, Poland, Estonia, Lithuania, Hungary, Romania, and Slovenia.

Organisational system of consumer protection can be structured according to the ratio of the activities performed by public and civil (non-state) institutions. Garai and Ritter investigated the formation of the civil consumer protection. They concluded that three institutional structures are formed in Europe as the result of the different development (Garai–Ritter, 1998):

- The state institutions are put first related to the consumer protection activities.
- Typical countries: Finland, Sweden, Norway, Denmark.

- The activity of the civil (non-state) organisations is dominant.
- Typical country: Germany.
- Mixed institutions. The consumer protection activities are carried out by both state and civil organisations. Typical countries: Belgium, France, Spain.

Katalin Cseres investigated the institutional solutions on the field of competition law enforcement. The aspect of her analysis was the degree of the separation of the organisations in the different countries. She introduced three models according to the analysis: (1) combined, (2) partially combined, and (3) distinct administrative model. The concentrated model is mostly applied in the countries of the English and the Scandinavian models. Cseres draws the conclusion that the merger of the consumer protection and competition law enforcements could be beneficial because of the common work, experience, and close coordination. Concentrating of the additional activities and services can save costs, too. The advantage of the single authority is the possibility of self-decision, so no compromise is required because of the different aims (Cseres, 2013).

Now the models tend to be overlapped, thus completely separated, pure form cannot be observed today. Administrative institutional structures are characterized also by this speciality, that is the clear assignment of the task and the organization will start to disappear. Previously the tasks of the state was carried out by its own administration in a hierarchic and bureaucratic way. The decisions were made by one person or by a small group. Nowadays state and non-state participants take part together in the preparation of the decisions, and also in the decisions. The role of coordination, inspiration and monitoring is gaining more importance, and that of the operative tasks is decreased. The classification of the administrative organizations shows large differences from country to country. This classification can be either vertical (based on levels) or horizontal (based on task/competence/sector). The countries can be studied according to the relationships of the levels with each other (state governmental or local governmental type), too. According to the vertical division the organizations can be classified as central (with power to the whole country), local, or regional/mid-level institutions. The countries show different specialties in this respect. E.g. Luxembourg, Malta, Lithuania, Latvia, and Estonia does not have any mid-level organization. Characteristic of some country is the great fragmentation. E.g. Germany is made up of 16 federal states, 41 regions, and 439 districts. Other

example is Italy, where there are 103 provinces in 21 regions, but the same structure can be observed in the case of France, Spain, and Great Britain. In the former socialist countries, like in Hungary, the number of the organizations, which are subordinate to the government, is much higher, than the number of the organization in other administrative systems. There are many examples, where the ministries do not set up any separate authorities, but they perform a task by their own unit. The horizontal division is characterized basically by the ministry structure. The ministries have responsibility to control the sectors, and the authorities are responsible for a limited region (Balázs et al., 2011).

There are also very interesting features of the consumer protection authorities. In Finland the Ministry of Employment and the Economy is responsible for the consumer protection politics and for the food safety, but the consumer protection laws are enforced by the Ministry of Justice. The Consumer Agency and the Consumer Ombudsman can be seen as primal authorities at official enforcement. There are distinct enforcement authorities on the field of food safety and financial supervision: Finish Safety and Chemicals Agency, and Finnish Financial Supervisory Authority respectively (Finland, 2010). In Germany there is no centralized supervisory body of consumer protection. At state level consumer protection is controlled by the Ministry of Bundesministerium der Justiz und für Verbraucherschutz, but all of the 16 federal states are responsible for the enforcement of the laws. The consumer protection is based on the principle of prevention, which is supervised by the authority of Bundesinstitut für Risikobewertung. Food safety is controlled by the Bundesamt für Verbraucherschutz. In Germany the efficiency of consumer protection is ensured by assignment of the operation to the non-governmental organizations. One of the largest German non-governmental organizations is Verbraucherzentrale Bundesverband, which includes 41 institutions operating as a union (16 consumer advice centres and 25 other organizations dealing with consumer politics). This union represents the interest of the consumers, it can take legal actions, and it cooperates with the experts, who produced the consumer protection politics, with the authorities, and with the enterprises at both national and international level. In Belgium the federal public authorities are responsible for the consumer protection. The consumer protection politics fall totally within the cognizance of the Federal Public Service for the Economy, SMEs, Self-Employed and Energy, more commonly known as the FPS Economy. In Great Britain the consumer protection

is controlled by the Department for Business, Innovation and Skills at ministry level. Trading Standards Institute is responsible for the procedure from 1956, which has about 200 offices nationwide, and it supports the consumer protection at regional and local level. Its responsibility covers the communication, the investigation of complaints, and the control of compliance, too.

CONSUMER ENFORCEMENT

As a result of the globalization, the free movement of goods, and the cross-border purchases consumer protection enforcement has to be extended to over the border. The main institutions were analysed based on the activity structure concerning complaint management, alternate dispute resolution, and legal proceedings. During the research the number of the organization taking action against law-breaking was analysed on the basis of the reporting obligation of the Member States. There are some countries, such as Ireland, Latvia, Lithuania, Netherlands, Romania, and Sweden, where just one organization can be found. Greece and Germany are towards the other end of the scale, with 71 and 76 organizations respectively. Correlation study was carried out to evaluate the differences in the cardinality. It was found that number of the organization can depend on the size of the territory of the State concerning (Pearson Corr.: 0.517 Sig.: 0.006), but no clear evidence was found on this dependence. The different institutional structure of the individual States can be characterized by the strategy, if an authority or a non-governmental organization is empowered to take action against the law-breaking.

The cross-border complaint management is performed by the European Consumer Centre established in each country of the EU, as well as in Norway and Iceland. The European Consumer Centre Network “ECC-Net” is a network of these 30 offices. The aim of the network is to provide free of charge help and advice (resolving complaints, informing, etc.) to consumers on their cross-border purchases, whether online or on the spot. ECC’s were contacted by 93,964 consumers in 2015, which means a 0.3% increase compared to 2014. As a result of a 1.2% increase compared to 2014, 38048 consumers complained about an issue with their cross border purchase. 68% of the complaints concerned online shopping (ECC-NET, 2015).

There is no unitary framework or system regarding the operation of the organizations. In the most countries (19) ECC's are operating as governmental authorities, in the Central European and Western European States (9) they are maintained by mainly non-governmental organizations, and in two countries they are totally independently operated (Ireland and Luxembourg). The European Union give a 50% support for the operating costs through proposals, the rest of the costs is financed by national budgetary.

The national specialities of the complaint administration are summarized by the study Consumer Policy Toolkit published by the OECD. E.g. in Belgium any party can file a complaint relating to Belgian economic and consumer protection legislation with the Federal Public Service Economy. The organisation receives more than 15 000 complaints annually. The Danish Government maintains a Consumer Hotline through the National Consumer Agency, which provides around 35 000 consumers every year with information and advice. About 2000 to 3000 cases develop to formal complaints addressed by the Complaint Board. In Finland the Consumer Advisory Service provides consumers and businesses with information on their rights and obligations, and also provides mediation services for disputes between consumers and businesses. The function of this service was took over from the local municipalities by the State in 2009. In Sweden complaints are managed free of charge by the National Board for Consumer Complaints (ARN), which is a public authority that functions similar to a court. The primary task of the ARN is to impartially settle disputes that are filed by a consumer against a business. Although the recommendation of ARN is not legally binding, the majority of companies nonetheless comply with the outcome. In France the complaints can be filed with national or local organisations. About 17 national organisations are linked with the General Directorate for Competition Policy, Consumer Affairs and Fraud Control, which has developed a consumer complaints barometer. The complaints are analysed and classified according to the sector (12 different types), the type of the product or service (54 different types), that was subject of the consumer's complaint, as well as the nature of the claim (on the base of 5 main types, 40 subjects, and more than 160 special questions). Beside that dispute handling mechanisms was set up by some firms in the country, and independent sectorial ombudsmen were called into being by public authorities and/or firms (OECD, 2010).

Institution of complaint management at Union level is the European Ombudsman, which was established in 1995. European citizens, businesses, associations or other bodies with a registered office in the Union may complain to the European Ombudsman on the grounds of maladministration. Maladministration occurs if an institution fails to act in accordance with the law, fails to respect the principles of good administration, or violates human rights. Altogether 23,072 citizens were helped by the European Ombudsman in 2014. 19,170 advices were given through the Interactive Guide on the official website, 1,823 requests for information were replied by the Ombudsman's service, and 2079 complaints were registered. The Ombudsman's costs is an independent section of the EU budget. In 2014 it was as high as 9,857,002 EUR. The institution has a highly qualified, multilingual staff. In 2014, the European Ombudsman's establishment plan contained 67 posts. The ombudsmen deal with complaints against national, regional, and local public authorities in the Member States. Together with the European Ombudsman and the European Parliament's Committee on Petitions, they form the European Network of Ombudsmen. The Network consists of over 95 offices in 36 European countries (Ombudsman, 2015).

The other form of the enforcement is the alternative dispute resolution (ADR, i.e. out-of-court enforcement procedure). Main types of that are conciliation, mediation, and the arbitration. The most often applied organization form of conciliation is the conciliation board. Some differences can be conceived in the case of the countries. One possibility is the centralized form operated conciliation board, which is part of the governmental administration, so it is established by a legalisation, and maintained from the state budget. This form is characteristic in the Scandinavian countries. Other possibility is the maintenance of non-governmental conciliation board, which is operated in parallel with the chambers and public bodies, and the costs of the conciliation are financed by them. This form is normal in Great Britain, Netherlands, and Germany (Fazekas, 2007). In Spain and in Portugal consumer arbitration system was established for the alternate dispute resolution (Dézsi, 2009).

Different network systems are operated in the European Union. In some cases, the Ombudsman may consider it appropriate to transfer a complaint to the European Commission, to SOLVIT, or to Your Europe Advice (YEA). SOLVIT is a network set up by the Commission to help people, who face obstacles when trying to exercise their rights in the Union's internal market. SOLVIT deals with

cross-border problems between citizens or businesses, on the one hand, and national public authorities, on the other. It is actually an online network, and the problems should be solved within 10 weeks in an out-of-court process. The service is provided by the national administration in each EU country, as well as in Iceland, Liechtenstein, and Norway. It can help in dispute settlement procedures, when the EU law may be wrongly interpreted.

There are subgroups of this institutions on the field of financial service, energy, and competition. FIN-NET is similar to the SOLVIT system on the field of alternate dispute resolution. FIN-NET is a financial dispute resolution network. It is part of the national out-of-court complaint schemes in the European Economic Area countries (the European Union Member States plus Iceland, Liechtenstein, and Norway) that are responsible for handling disputes between consumers and financial services providers, i.e. banks, insurance companies, investment firms and others in cross-border cases. YEA is an EU advice service for the public, provided by the legal experts from the European Citizen Action Service. The experts cover all EU official languages, and are familiar both with EU law and national laws in all EU countries. YEA works closely with SOLVIT.

The third subsystem of consumer's enforcement is the legal proceeding, where two international organizations can be highlighted. One of them is the European Court of Human Rights, which is formed from the judges of 47 countries of Europe, but they do not represent any state. The main task of the institution is ensuring the enforcement and implementation of the European Convention on Human Rights. It investigates all the complaints submitted either by individuals, or sometimes by the states. The holding is binding, so the countries concerned must to execute it.

Other main institution of consumer's enforcement is the European Court of Justice, which aims to resolve the legal dispute between Member state's governments and the Union institutions. Individuals, as well as businesses and other organizations can go to the Court, if it is thought that their rights were abused by one of the European Institutions. The institutions consist of one judge from each EU country, and theirs work is supported by 11 Advocates General. The legal proceeding can vary from country to country, just as in the case of the conciliation process. If a file of general interest is planned to be suited, then there are differences in the type of the institution, which can initiate an action in the name of the consumers. In Germany, Greece, Spain, France, Italy, Luxembourg,

Netherlands, Portugal, and Hungary the non-governmental organizations can act on this field. In other countries, like as Great Britain, Denmark, Ireland the independent institutions or the governmental authorities have the right to take the consumers' interest. Belgium is the only country, where both the governmental and non-governmental institutions can take action (Németh, 1998). The court systems of Member States are highly varied, and they reflect the national natures of the different countries, too. In most of the States there are courts of different types. Usually 3 types can be identified, namely (1) general court, (2) specialized court, and (3) constitutional court.

ORGANIZATIONAL COOPERATION

The efficient function of consumer protection is supported by more organizations. Such network systems were established, which helps in the cooperation at international, European, and national level.

International Consumer Protection and Enforcement Network plays an important role at international level. The Network includes international countries and EU States, altogether 53 countries. Its aims are to share information about cross-border commercial activities, to ensure that consumer protection legislation will not be violated out of Europe, to encourage global cooperation among law enforcement agencies, and to protect consumers' economic interests around the world. Consumers, Health, Agriculture and Food Executive Agency (CHAFEA) carries out duties assigned to it by the European Commission's Directorate-General for Health and Food Safety. It administers the EU Health Programme, the Consumer Programme, and the Better Training for Safer Food initiative. CHAFEA is the successor to the Executive Agency for Health and Consumers, and it started to work in 2014. It has about 50 staff members based in Luxembourg.

European Food Safety Authority (EFSA) is a similar organization on the field of food safety. The Authority provides independent scientific advice on food-related risks. Its work involves gathering scientific data and expertise, providing independent, up-to-date scientific advice on food safety issues, providing information about the threats, risk assessment, and collecting and evaluating of data. EFSA provides also information to the European Commission regarding food consumption, consumers' health and safety, in addition, it comments the

legislation drafts. The authority's work is supported by about 400 staff members and external experts.

Other important organization is the European Medicines Agency, which is responsible for evaluation and supervision of medicines, for the benefit of public and animal health in the European Union. It began operating in 1995. PROSAFE (Product Safety Forum of Europe) is a non-profit professional organisation for market surveillance authorities and officers, established in 1990 (PROSAFE, 2016). Its primary objectives are informing, education, and inspiring of experts, development and familiarization of best practices.

More information network systems have been established at European level in order to ensure the rapid exchange of information. Such network systems are e.g. the RAPEX and the RASFF.

RAPEX (Community Rapid Information System) is active on the field of product safety. Its main aim is informing about the measures and actions in relation to consumer products (non-food) posing a serious risk for the health and safety of consumers. Each Member State operates a contact point in one of its national authorities, where the notifications are given from. There are two types of that. The one is the notification in the case of risks requiring rapid intervention (alert), and the other is information notification. Besides the preventing the supply to consumers of products which pose a serious risk to their health and safety, main aim of RAPEX is facilitating the monitoring of the effectiveness and consistency of market surveillance and enforcement activities in the Member States. Most of the products with high risk are clothes, fashionwears, and children's toys, which are originated from China.

RASFF (Rapid Alert System for Food and Feed) was established to provide food and feed control authorities with an effective tool to exchange information about measures taken responding to serious – direct or indirect – risks to human health detected in relation to food or feed (RASFF, 2014). The system is controlled by the European Commission together with the European Food Safety Authority, which includes 28 Member States, Norway, Iceland and Lichtenstein. There are contact points in each country, which ensure a rapid accessing of information by the competent authorities. In addition, RASFF is in connection with the World Health Organisation through the rapid emergency response system called International Food Safety Authorities Network. There are contact points of more than 160 countries in all over the world as part of this network system.

The RAPEX system is in operation from 2003, the RASFF system was introduced in 1979, but it is appeared in the EU legislations just from 2002, as one of the result indicators of safety enhancement. According to the seriousness of the risks identified and the distribution of the product on the market, the RASFF notification is classified as alert, information, or border rejection notification. If the efficiency of the notifying system is measured as the increase of the notification numbers, then significant improvement can be observed in the last decade. Considering the diagram of RAPEX data above a trend break is shown in 2011, which is explained by the effects of the budget restriction. However, data of RASFF system shows a continuous decrease from 2012. Although the number of the alert and information notifications have been increased also in the last period, there was a significant fall in the number of the border rejection notifications. According to the preliminary annual report 2015, a total of 3,049 original notifications were transmitted through the RASFF, of which 775 were classified as alert, 392 as information for follow-up, 495 as information for attention, and 1,387 as border rejection notification. The overall data present a 3.4% decrease in original notifications compared to 2014.

If providing information, the consumer protection advice plays a very important role. The European Economic and Social Committee was established in 1957. It provides a unique forum for consultation, dialogue and consensus among representatives of the various economic, social and civil components of organised civil society. The Committee adopts also resolutions on the legalisations within its competence. During the law-making process, its report has to be taken into account. Also the section Consumer Protection of the Treaty of the European Union gives guidance as follows: “The European Parliament and the Council, acting in accordance with the ordinary legislative procedure and after consulting the Economic and Social Committee, shall adopt the measures...” (EU, 2010:124, Article 169, Paragraph 3)

The other main institution of advice is the European Consumer Consultative Group, established in 2003, which is the main forum to consult national and European consumer organisations. It gives an opinion regarding consumer protection, it advises, guides, and inform the Commission to help in development of the consumer protection politics, and it acts as source of information. The Group meets three times a year. It includes one representative from each Member States, as well as one member from the organisations BEUC (European Consumers’ Organisation) and ANEC (European Association for the Co-

ordination of Consumer Representation in Standardisation), two associate members, and observers from Iceland and Norway.

There are also examples for transatlantic cooperation between consumer protection organizations. E.g. FIAGC (Iberoamerican Forum of Consumer Protection Agencies) realizes the cooperation among Latin America, Spain, and Portugal, CONCADECO (Central American Council of Consumer Protection) is active in Central America, ACCP (ASEAN Committee on Consumer Protection) supports the cooperation in Southeast Asia, and the international platform of Consumer Forum of East Asia Nation holds the consultative meetings on consumer policy among China, Japan and Korea.

There are numerous non-governmental organizations in the consumer protection system as part of the representation subsystem. The Consumers International (CI) is said to be the largest and most influential global consumer protection organisation in the world. It was founded as a non-governmental organisation in 1960, and it has more than 240 member organisations in 120 countries, on 4 continents. It is registered in the UK, but there are regional offices in Asia, in Latin America, and in Africa. CI support and cooperate with its member organisations, as well as protect, inform, and give a voice to and secure rights for customers worldwide. The aim is to build such a world, where people can make informed choices on safe and sustainable goods and services.

Transatlantic Consumer Dialogue (TACD) is another, global active organisation, which was launched in 1998. It is a forum of US and EU consumer organisations. TACD's aim is drawing up common suggestions on consumer politics for the USA and for the EU, which strengthen the customers' interests in the politics of both sides. BEUC (European Consumers' Organisation) plays an important role in consumer protection at European level from 1962. It supports also the work of ECCG. It includes 40 European independent consumer organisations from 31 countries, and, accordingly, this is the largest non-governmental organisation in the European Union. BEUC supports also the European Parliament. Main task of this organisation is to represent and defend the interests of its members and all European consumers at Union level. The organisation is based in Brussels, and it financed by membership fees and EU resources (BEUC, 2015). Main representative body of quality and standardization is ANEC (European Association for the Co-ordination of Consumer Representation in Standardisation), which is also called as The European consumer voice in standardisation. ANEX operates as an international non-

governmental organisation from 1995. It includes one representative of each consumer protection organisation of the Member States. ANEC represents the European consumer interest in the creation of technical standards, mainly at the three European Standardisation Organisations (CEN, CENELEC, ETSI). ANEC is financed by the European Union (95%) and EFTA (5%), and in part by the members, too.

The most dominated institution of the executive committees in Europe is the Consumer Protection Cooperation System, which improves the cooperation and information exchange in the field of consumer protection enforcement. In the frame of this network the national authorities are entitled to different procedure actions, if they experience any infringement in the Union. The cooperation is regulated by Council Regulation (EC) No 2006/2004 (Cooperation between national authorities responsible for the enforcement of consumer protection laws). The network is maintained by the communication between the liaison offices of the Member States and the competent authorities. Consumer liaison office is such a Member State authority operating like a sort of governing body, which harmonises the cooperation. The competent authorities include all the national, regional or local formed authorities, which serves the protection of consumers' interest, and which has power to implement specified legislations. The tasks of the consumer liaison office in the different countries can be carried out at different levels, such as ministry, public authority or Ombudsman. It can be seen on the previous map above that the countries of ombudsman institutional structure are comparable with the states with previously discussed administration structure of Scandinavian model, as well as with the countries with largely state institutional system. It can also be stated that there are more countries with consumer protection liaison offices operate at public authority level, then at ministry level.

The Member States have to name the different authorities with competence related to 19 Directives. These organizations were analysed according to both their cardinality and overlapping with single liaison offices. In the most countries the liaison offices are simultaneously organizations with some competences, too. The last map shows the results of the analysis according to the cardinality of the authorities with competence. We can conclude that in the most countries there are 6...10 organizations. Belgium is a special country from this point of view, because all of the competences are assigned just to one authority. On the other hand, Germany has 34, and Spain has 20 authorities. Characteristic feature of Hungary is the fact that our liaison offices have competence related to almost each

directive (concentrated institutional structure). According to the comparison of the analysis of Katalin Cseres on institutional model, and the different type liaison office systems it can be stated that official bodies at ministry level are included in the distinct authority model.

The institutional model introduced by the author confirms also my conclusion that in large number of countries complex consumer protection activity is assigned to the single organizations. It is proofed by the observation that the countries of the single institutional model of Katalin Cseres are identical to the states, where the liaison office also acts against the infringement.

Summarized it can be stated that there is no equal or almost identical structure of the organizations engaged in consumer protection activity. The sector specific tasks are managed either by a single or by more authorities in the case of different countries. The functions are shared between the mid-level, regional authorities in federal states. Analysing the institutions from the point of view of carrying out of their tasks similarities can be detected among the countries. General intention is e.g. the concentration of the activities, so the consumer protection organizations carry out more and more wide-ranging tasks. The structure of the institutions is complex, and hard to analyse. Considering the future directions, it can be predicted that current organisational structures will be intensively changed. This assumption is also suggested by the challenges of the consumer protection in the 21st century, such as the unsolved problem of data protection or the e-commerce.