



Leaseurope, the European federation representing the leasing and automotive rental industries, supports the Commission's aim to ensure EU consumer policy is adequately equipped to deal with the dual climate and digital transitions, and to take into account the unique challenges COVID-19 has brought about for consumers.

The leasing and automotive rental industries are committed to ensuring high standards of consumer protection, and Leaseurope has taken a number of steps to ensure these high standards are applied consistently and that important information is communicated to consumers in a clear, understandable way. This commitment is demonstrated for example in Leaseurope's [guidelines to the code of best practice for the car and van short term hire industry](#).

Moreover, during the COVID-19 crisis the rental and automotive industries have also played an important role in mitigating the impact of the crisis on customers, with many of our members putting in place measures to support and communicate effectively with their customers. For example, in addition to introducing payment holidays for customers unable to make their repayments, our members set up dedicated webpages or phone lines to ensure customers had access to up to date information and were aware of the measures in place to support them. Additionally, a number of our members (who are in the position to do so) have offered extended payment holidays -that go beyond those required by national law- to customers facing financial difficulties as a result of the crisis.

The digital transition, which has been accelerated during the COVID-19 crisis undoubtedly brings new challenges for consumers, and Leaseurope recognises the need to ensure the regulatory framework is able to deal with changes that have arisen as a result of advances in technology. It is also important that the new consumer agenda recognises the importance of a technology neutral approach to regulation. This is essential to ensure frameworks aimed at protecting consumers do not become outdated as technology evolves, as well as ensuring a level playing field between actors undertaking the same activity.

Whilst the leasing and automotive rental industries undergo tremendous efforts to ensure consumers are provided with relevant information in a clear and understandable manner, there are a number of instances where the efforts of these industries alone is not enough to protect customers from potentially misleading or unclear terms. For example, where consumers choose to book through an online intermediary, which is particularly common in the case of short term car rental, the intermediary may not present information in a way that is clear and concise. Additional guidance on the responsibilities of platforms and intermediaries, and measures to encourage platforms and intermediaries to adopt similar principles to those already adopted by the leasing and automotive rental industry in the context of how information is presented to consumers, would be welcomed.

Finally, the leasing and automotive rental industries are heavily reliant on tourism, and the impact of COVID-19 on the tourism industry has had a knock-on effect on the leasing and automotive rental sectors. It is therefore paramount that the Commission's consumer strategy recognises the efforts already undertaken by our industry, and that any additional measures introduced in this area are proportionate and necessary.