



STRATEGY

2024 - 2026



Coimisiún um
Iomaíocht agus
Cosaint Tomhaltóirí

Competition and
Consumer Protection
Commission



INTRODUCTION

In an era marked by unprecedented changes in the consumer and competition landscape, the role of the Competition and Consumer Protection Commission (CCPC) has never been more significant. This strategy outlines our commitment to proactive and impactful responses to this evolving landscape.

We are driven by ambition and determination, recognising our profound responsibility to protect and empower consumers and uphold principles of fair competition. This strategy details our forward-looking and innovative approach, envisioning a thriving economic landscape where competition is robust, consumers are empowered, and markets are governed by fair rules.

The CCPC possesses and intends to employ an expanded set of enforcement powers across our competition, consumer protection, and product safety remit. Our increased enforcement not only signals that breaches of the law will be penalised but also acts as a potent deterrent, promoting greater compliance across the economy.

Consumers remain central to our mission. We have successfully established connections with consumers through diverse channels, providing information that empowers them to make informed decisions and assert their consumer rights. Our commitment is to remain

accessible, effective, and enhance consumer awareness of the CCPC as a vital resource.

As a strong public advocate, we take pride in our role as protectors of consumers and promoters of competition. We emphasise robust, evidence-based arguments and aim to translate our work into meaningful changes in consumers' lives through research and stakeholder engagement.

The CCPC has undergone remarkable growth, expanding its portfolio and capacities, adapting to the digital shift. This expansion is set to continue, particularly as the regulation of digital and the data space evolves. Ensuring our team is well-equipped and structured to match our expanded remit remains a priority.

This strategy reaffirms our commitment to promoting competition and ensuring a level playing field. As we step into this ever-evolving era, our values and mission guide us in prioritising resources for maximum impact, working towards an economy and society where markets function effectively and consumers are treated fairly.

Brian McHugh, Chairperson





ABOUT THE CCPC

The CCPC is the statutory body responsible for enforcing and promoting compliance with competition, consumer protection and product safety law. The CCPC also has important and expanding roles in relation to digital markets and data.

Our aim is to make markets work better for consumers. Consumers benefit from competitive markets as firms are incentivised to produce better products and services at lower prices. Consumer protection law seeks to redress the imbalance of power and information between traders and consumers and ensure that consumers are treated fairly. As consumers, we expect that the products we buy are safe. The CCPC's product safety work ensures that this expectation is met.

We encourage compliance by providing guidance to businesses on their obligations and consumers' rights. We promote consumer awareness by providing information to consumers about their rights, personal finance and product safety, through our consumer helpline, our website ccpc.ie, public awareness campaigns and our various financial education initiatives.

The CCPC is governed by an Executive Chairperson and Commission. Each Member of the Commission oversees a number of divisions in the CCPC on behalf of the Commission.

CONTEXT AND DIRECTION

Context: a complex and dynamic environment

Through our efforts and achievements over the period of the Strategy 2021-2023 we have played an important role in helping to create a level and fair playing field for consumers and businesses alike, ensuring consumers are empowered and protected. This leads to a better economy and society. Please see Appendix 1 to this Strategy Statement for further review of the outcomes and effectiveness of our previous Strategy.

The purpose of the CCPC's 2024-2026 Strategy Statement is to set out a high-level framework that enables us to continue our work to deliver tangible, relevant and impactful outcomes within the resources available to us.

The CCPC's 2024-2026 Strategy Statement will cover a period when supply chains are still recovering from the Covid pandemic and where price levels have risen considerably as a result of increased geopolitical conflict. This has translated into a cost of living crisis for households that is not unique to Ireland. At the same time, the process of the continuing digitisation of the economy, the drive for sustainability and the increased interactions between consumers and big tech platforms and Artificial Intelligence (AI) are important background trends that need to be considered.

There is an increasing focus on the support of green choices by consumers, businesses and policy makers as part of the green transition and this context is significant as we look forward to the next three years of our strategy.

In terms of digital and data, modern life and commerce is increasingly conducted online. Information about our preferences and interests are harvested and monetised in ways that would have seemed like science fiction only decades ago. AI and how it may impact on consumer interests and competition raise important issues. As the European Union moves to level the playing field in relation to digital and data, the CCPC has recently received, and expects to receive more, new responsibilities and powers across a range of new and existing functions for the purpose of tackling issues in digital and data markets. The CCPC has to ensure it

is ready to take on these roles and to make robust decisions that will be upheld if they are subjected to judicial scrutiny. The preparations in some areas have been ongoing over our previous strategy but in other areas a significant amount of work is required to draft legislation, establish parameters with other agencies and put structures in place to be able to deliver on new functions.

Set against this dynamic background, over the period of the 2024-2026 Strategy the CCPC will need to reorganise and grow in size and capability. This is always challenging in the face of a very intense battle for talent. We will have to deepen and broaden the skill base of our staff to be able to perform our functions in a manner consistent with delivering on this strategy. We are, like many other regulators, competing for talent both with each other and with the private sector. Retention will be a key driver of our ability to deliver over the next three years. Recruiting, retaining and developing our staff will be the foundation stone upon which all of our strategic goals will be built. Our "People Strategy" will be aligned to face this challenge and at the same time ensure that the CCPC remains there to support our people to manage their well-being, facilitate flexible work practices and enable continuous professional development.



Direction: a clear future focus

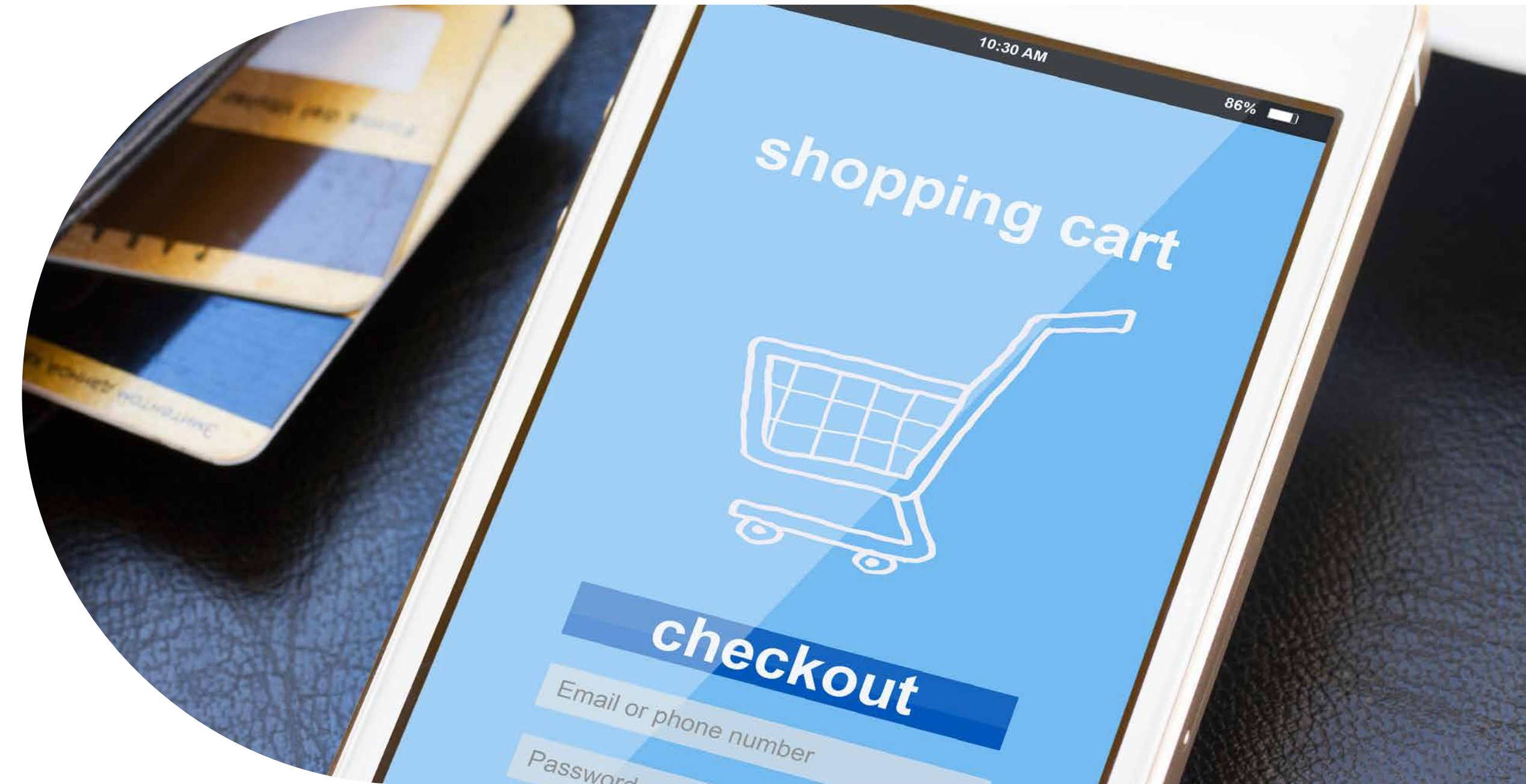
In the course of developing this strategy, the CCPC consulted internally with staff, and externally with stakeholders both in Ireland and abroad to obtain their views on the CCPC's operating environment and where they believe we should focus our efforts. There were many valuable insights, all of which have been extremely beneficial in helping shape the direction of this strategy, and specific priorities for action over the course of the next three years.

In terms of the CCPC's operating environment at a top level, there were the following overarching themes:

- **Intervene where consumers need us most:** A constant theme was that the CCPC needs to intervene in areas where our actions can have the most significant impact for consumers.
- **Put a plan in place on how to deploy new functions and tools in relation to digital markets and data:** The CCPC needs to be clear on where it can make the biggest impact in digital markets and data. The CCPC also needs to establish when it will lead and when it will support others (particularly the European Commission).
- **Make a larger impact:** The CCPC has an opportunity to increase our impact with our new powers and to deliver real change as we grow both in size and remit.
- **Push for changes that are needed to enhance consumer welfare:** The CCPC needs to identify market issues that are harming consumers and push for change. This should be in new areas but also following up in areas where the CCPC or its predecessors previously advocated for changes that have not been implemented.

Our international relationships will increase in significance as we take on new digital and data roles and as the long-term arrangements with the UK in the competition and consumer protection/product safety space are agreed at EU level. We will also need to work more closely with other domestic regulators in areas where our work overlaps.

The CCPC needs to continually reassess our priorities and activities, anticipating and responding to evidence of consumer detriment. With an expanding mandate, the CCPC will necessarily have to apply its prioritisation principles (available on the CCPC website) which include a focus on those issues that have the potential to cause the most harm to consumers and businesses. This will require some hard choices but we will have to focus our efforts so as to achieve our vision of open and competitive markets where consumers are protected and businesses actively compete.



OUR MISSION, VISION AND VALUES



Our mission is to use our knowledge, skills and statutory powers to promote competition and enhance consumer welfare



Our vision is for open and competitive markets where consumers are protected and businesses actively compete



Our values are:
Open Communication
Empowerment
Independence
Ambition
Excellence



OUR STRATEGIC GOALS 2024 – 2026

1



Enforcement and Compliance

We will use all our tools, including our new powers, to increase enforcement and compliance outcomes.

2



Empower and Inform

We will empower consumers to make informed choices.

3



Advocacy and Research

We will be the leading voice in promoting open and competitive markets and representing the interests of consumers.

4



Structure and Resource

We will evolve and grow in size and capability.



Goal 1: Enforcement and Compliance

OUR STRATEGIC GOAL

We will use all our tools, including our new powers, to increase enforcement and compliance outcomes.





AMBITION

To ensure that consumers can trust that markets are working in their interests.

OUR ACTIONS

- ▶ Increase our capacity to conduct multiple simultaneous large-scale investigations.
- ▶ Promote arrangements that enable anonymous whistle blowing.
- ▶ Build our capacity to collect and use large scale data sets to identify potential breaches, starting with screening for bid-rigging in public procurement.
- ▶ Develop our surveillance capabilities and policies to support increased enforcement and compliance.
- ▶ Enhance our case management processes so that we can assign resources to high impact cases.
- ▶ Embed and deploy the new enforcement regimes across all our functions including the establishment of a Competition Adjudication Unit.
- ▶ Enhance our engagement with the business community to drive compliance by running campaigns and events targeted at businesses and regularly updating the business sections of the CCPC website.
- ▶ Conduct appropriate market surveillance and inspections for the purpose of supporting increased enforcement and compliance.
- ▶ Assist the European Commission and other Member State authorities with enforcement actions.
- ▶ Build on our relationship with Customs to increase the number of risk-based inspections we conduct.
- ▶ Continue to deliver an effective merger enforcement regime (including by introducing updated merger guidance and by focussing our effort on those mergers that have the potential to cause the most harm to competition).

OUR MEASURES

- ◐ Increased outcomes across all enforcement functions.
- ◐ Increased impactful inspections and compliance sweeps.
- ◐ Increased levels and visibility of direct engagement with businesses to achieve compliance.
- ◐ Impact assessment of our enforcement work.



Goal 2: Empower and Inform

OUR STRATEGIC GOAL

We will empower consumers to make informed choices.





AMBITION

To ensure every consumer is both informed and empowered, enabling them to make sound decisions, particularly in complex and changing markets.

OUR ACTIONS

- ▶ Develop a new communications strategy to include a new brand and website.
- ▶ Increase consumer engagement with our consumer information channels and financial education programmes.
- ▶ Play a leading role in the development and implementation of Ireland's first national financial literacy strategy.
- ▶ Review and enhance our personal finance comparison tools to help consumers get the best value for money.
- ▶ Deliver practical and insightful consumer awareness campaigns informed by market intelligence, consumer research and behavioural economics to protect consumers from unfair practices and unsafe products.
- ▶ Assist consumers in resolving cross-border consumer issues.
- ▶ Alert consumers when dangerous products are recalled from Irish markets.
- ▶ Promote good business practices such as effective and efficient complaints handling processes.
- ▶ Support reform of the District Court Small Claims procedure.
- ▶ Empower consumers to make informed green choices when purchasing goods and services.

OUR MEASURES

- Increased consumer engagement with our communications channels and financial education programmes.
- Increased awareness of the CCPC amongst consumers and businesses.
- Maintain high level of customer satisfaction with our information services and financial education programmes.



Goal 3: Advocacy and Research

OUR STRATEGIC GOAL

We will be the leading voice in promoting open and competitive markets and representing the interests of consumers.



AMBITION

To make markets work better for consumers by representing their interests nationally and internationally.

OUR ACTIONS

- ▶ Increase level of research and market studies to identify where and how markets can be more competitive and work better for consumers in line with our prioritisation principles.
- ▶ Work with Government departments, regulators, the European Commission and other State agencies to ensure that CCPC recommendations are implemented.
- ▶ Support enactment of legislation to allow screening of public tender data to detect bid-rigging.
- ▶ Advise and make recommendations to Government in relation to proposals for legislative change affecting our remit.
- ▶ Intervene where necessary to ensure consumer welfare is protected and competition is promoted in legislative, regulatory and policy decisions.
- ▶ Provide a strong voice in public debates to promote competition and consumer welfare.
- ▶ Review potential to include market studies and research when assessing the impact of our work.

OUR MEASURES

- ▶ Number of completed market studies and research projects.
- ▶ Increased public recognition of the CCPC as the authoritative voice for the consumer interest.
- ▶ Recommendations from advocacy, policy submissions, market studies and research projects are acted upon.
- ▶ Active analysis of public tender data to detect bid-rigging.



Goal 4: Structure and Resource

OUR STRATEGIC GOAL

We will evolve and grow in size and capability.





AMBITION

To ensure our organisation evolves and grows with the landscape in which it operates – having the resources, expertise and capabilities required to deliver on our remit.

OUR ACTIONS

- ▶ Develop and implement a plan on the structure of the organisation so that we can be optimally configured and resourced.
- ▶ Align our resources in a new structure to realise our strategy in line with our prioritisation principles.
- ▶ Develop and implement a People Strategy to support and develop our people to meet their potential.
- ▶ Develop best workplace practices to meet the changing needs of our workforce and to ensure compliance with all governance requirements.
- ▶ Develop and deliver an ICT strategy to provide systems and infrastructure to enable effective and flexible working.
- ▶ Enhance learning and development, including the digital capability of our people.
- ▶ Regularly review our strategic workforce planning to guide how our organisation will evolve and grow in size and capability.

OUR MEASURES

- New organisational structure in place.
- Recruitment and vacancy levels.
- Staff retention levels.
- Continued professional development of staff through a variety of learning offerings.

DELIVERING AND MEASURING PERFORMANCE

1



PROGRAMMES OF WORK

The CCPC's 2024-2026 Strategy Statement sets out overarching goals to be achieved over the next three years. These will be delivered and monitored through the CCPC's annual work programme planning. Each plan will incorporate the strategic measures alongside each strategic goal.

2



MEASURING PERFORMANCE

Each strategic goal identifies key actions and additional measures which are the intended outcomes of this Strategy Statement. CCPC activity from the last year of the Strategy Statement 2021-2023 will constitute the baseline for measuring performance under the Strategy Statement 2024-2026. Progress on the annual programmes of work that implement this strategy will be monitored. In addition, the CCPC has an oversight and performance delivery agreement with our parent Department, the Department of Enterprise, Trade and Employment. We have also published an Impact Assessment Report 2017-2020 in relation to our competition enforcement and merger control work, and will continue to build on this type of reporting over the Strategy period.

3



OUR PUBLIC SECTOR DUTY

Over the course of the previous Strategy Statement, the CCPC undertook a number of steps, both internally and externally, in the fulfilment of our 'Public Sector Duty' in relation to eliminating discrimination, promoting equality of opportunity and treatment, and protecting the human rights of both staff and those to whom we provide services.

For the period of this strategy our areas of focus will continue to be:

- 1 Our engagement with the public, both directly and indirectly, through our role in providing information and raising public awareness.
- 2 Our enforcement and compliance activities, including our engagement with members of the public in the course of carrying out those duties.
- 3 Our workplace policies, practices and development supports.

Over the course of this strategy we will prioritise a focus on our public sector duty in the development and implementation of our People Strategy, our new website and our new communications strategy. The annual reports published under this 2024-2026 Strategy Statement will report on related developments and achievements.

APPENDIX 1: STRATEGY 2021 - 2023

The ambition of the CCPC's Strategy 2021-2023 was to deliver effective enforcement and compliance outcomes, empower consumers, be a leading voice for consumers and invest in our people and in our infrastructure and governance systems. Key to this was to increase enforcement outcomes, scale up activities, improve merger control processes, increase consumer awareness, improve financial education and money tools, promote changes to make markets work better for consumers and support growth, continuous improvement and innovation through the professional development of our people.

Over the period of the 2021-2023 Strategy there have been many notable achievements that have enabled the CCPC to play a meaningful role in empowering consumers, championing their rights, and ensuring markets are open and competitive. These achievements are detailed as follows:

Effective enforcement and compliance outcomes

We secured legally binding commitments to address alleged anti-competitive price-signalling practices in the private motor insurance sector and other commitments in relation to resale price maintenance (RPM). The Director of Public Prosecutions directed charges to be laid against 13 suspects in a CCPC investigation into alleged bid-rigging of public transport tenders. In addition to this we continued to work to be able to screen public tenders for bid-rigging and rolled out an anonymous whistleblowing system for cartel informants. We continued to support the enactment of the Competition (Amendment) Act 2022, which came into operation in September 2023. We issued 144 merger determinations. The CCPC also dealt with an unprecedented amount of Phase 2 merger cases. Most were cleared with commitments after intensive engagement with the notifying parties. A number were withdrawn before the CCPC issued an assessment and one merger was prohibited by the CCPC on the grounds that it would substantially lessen competition.

The CCPC co-led a formal EU Consumer Protection Cooperation (CPC) dialogue with TikTok, which claims 150 million active users in the EU. Twenty-nine commitments were secured from TikTok on the labelling of advertisements and

branded content, personalised advertising and virtual items. The CCPC also commenced a coordinated action with the Swedish Consumer Agency and the European Commission to address concerns about the manner in which WhatsApp updates its Terms of Service and Privacy Policy.

We published guidance for businesses based in Ireland on their post-Brexit obligations under consumer protection law, including scenario-based guidance for traders to support their compliance with the new Price Indications Directive Regulations. The CCPC carried out 261 consumer protection inspections over the first two years of our strategy and have concluded 147 consumer protection inspections to date in 2023. In addition to that some 227 fuel stations were monitored in relation to their price display practices. Four court prosecutions against vehicle traders were concluded in 2022 and 2023 for offences such as misleading consumers on the ownership history and mileage of cars being advertised and sold. During this period 61 Compliance Notices issued by the CCPC took effect and 65 Fixed Payment Notices issued by the CCPC were paid.

The CCPC removed 763,213 unsafe products from the Irish market and banned the sale of baby self-feeding pillows in Ireland due to the risk of death or serious harm to infants. The CCPC continued to manage EU Safety Gate notifications for unsafe products and worked with 18 market surveillance authorities (MSAs) on risk assessment and corrective measures, in our role as the lead MSA in Ireland.

Empowering consumers to make informed decisions

We implemented a very effective sponsorship through RTE's 'How to Be Good with Money' programme, reaching nearly 11 million views over the course of four seasons. We successfully advocated for the introduction of a national financial literacy strategy for Ireland. The CCPC made two submissions to the National Council for Curriculum Assessment (NCCA) on financial education. The first covered advocating to include financial education in the Aistear Curriculum for children from birth to the age of six. Our second submission supported the proposed focus by NCCA on financial literacy in the Leaving Cert Business Studies Curriculum.

We had over 6 million visits to ccpc.ie and our helpline. We enabled people to understand the benefits of switching financial providers through our Money Tools and had over 2 million visits to this tool. We supported consumers to understand the impact of Brexit on online shopping and the benefits of stronger rights when shopping from EU traders. We informed consumers and businesses of their new rights under the Consumer Rights Act 2022 using our website, helpline, media engagements and advertising.

Representing the interests of consumers and promoting competition

We conducted research into the fuel market, social media influencers and the grocery sector. We continued to advocate for the implementation of the recommendations and findings from the CCPC's market studies, policy initiatives and research projects. This included successfully working towards implementing the Hamilton Review recommendations on bid-rigging. The CCPC provided a detailed submission to the Department of Finance Retail Banking Review where we made a number of recommendations to promote competition and consumers' interests. The CCPC also provided extensive views to the Central Bank of Ireland consultation to inform their ongoing review of the Consumer Protection Code in 2023.

We continued to advocate for reforms in the legal sector, including reducing litigation costs, lowering barriers to entry to the legal professions and for conveyancing reforms.

In 2022, the CCPC started a review of our brand identity so it can better support the communication of our remit to key audiences. This work is ongoing in 2023.

Investing in our people, governance and infrastructure

We increased our staff headcount from 115 staff members at the date of publication of the last Strategy Statement to 185 staff members as at October 2023. 53 members of staff were made permanent staff of the CCPC during 2021 and 2022. During 2022 an average of 13.3 hours per employee were spent undertaking staff training and development. In the 2023 year to date an average of 15.71 hours per employee has been spent undertaking staff training and development.

We completed 19 internal audits from 2021 to October 2023, which included 3 follow-up reviews to assess the progress on audit recommendations. There were also 3 external audits carried out.

The CCPC also completed a Value for Money exercise that looked, in the first instance, at the impact of decisions in competition cases and mergers. This analysis showed that benefits of €66 million were generated from our interventions in these areas over the period from 2017 to 2020.



Headline Items from the 2021-2023 Strategy Period:

Effective enforcement and compliance outcomes

- 1 anticompetitive merger blocked
- 11 mergers cleared subject to commitments
- 2 mergers withdrawn in the course of a Phase 2 review
- Reduction in average time to issue Phase 1 merger decisions from 22.9 days in 2020 to 17.9 days in 2022
- 763,213 unsafe products removed from the Irish market
- Legally binding commitments from Ticketmaster and from 6 motor insurers
- 13 bid-rigging suspects charged by the Director of Public Prosecutions
- 408 consumer protection inspections

Empowered consumers to make informed decisions

- Over 6 million visits to ccpc.ie
- Over 2 million visits to our Money Tools
- New Consumer Rights Act content and campaigns

Represented the interests of consumers and promoted competition

- Reports on the fuel market, social media influencers and the groceries sector
- Successfully advocated for a national financial literacy strategy

Invested in our people, governance and infrastructure

- New Divisions established:
 - Policy, Research and International Division
 - Forensic Technology and Data Analytics Division
 - Cartels Division
- Increased staff headcount from 115 to 185

APPENDIX 2: EXTERNAL CONSULTATION

The CCPC would like to thank the following stakeholders who made contributions in the course of the development of this Strategy Statement. The opinions and views expressed have been central to the development of this document and we look forward to engaging with our stakeholders over the next three years in working towards achieving our common goals.

- Department of Enterprise, Trade and Employment
- Minister of State Dara Calleary
- European Commission – DG Comp
- European Commission – DG Justice and Consumers
- The Northern Irish Consumer Council
- The European Consumer Organisation (BEUC)
- Dr Cliona Kelly – UCD
- Professor Tommaso Valletti
- Patrick Massey
- Dr Vincent Power SC – A&L Goodbody
- Philip Andrews SC
- Helen Kelly SC
- Legal Services Regulatory Authority
- Central Bank of Ireland
- Commission for the Regulation of Utilities
- Coimisiún na Meán
- Data Protection Commission
- Advertising Standards Authority for Ireland
- Financial Services and Pensions Ombudsman
- Corporate Enforcement Authority
- The Bar Council
- National Competitiveness and Productivity Council
- Free Legal Advice Centres (FLAC)
- Sustainable Energy Authority of Ireland (SEAI)
- Irish Business and Employers Confederation (IBEC)
- The Society of the Irish Motor Industry (SIMI)



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