

CONSUMER PROTECTION IN BULGARIA: EU CHALLENGES

*Corina Ene*¹

Summary

Consumer protection represents today a key-concern for each modern economy, as it reflects its potential of providing well-being for citizens and of empowering them to act efficiently on the markets. In the European Union, consumer policy for 2007-2013 address several challenges, including those related to the extension of the EU, given the discrepancies between Member States.

This paper aims to underscore challenges that Bulgaria is facing today in the European context, based on relevant data resulting from surveys and reports. It also suggests several steps to be undertaken in the pursuit of better consumer protection at national level.

Key words: *consumer protection, consumer policy, Bulgaria, challenge*

JEL: *D18*

Introduction

European Union (EU) consumer policy for 2007-2013 is considered as a “relatively young EU policy” with “an ambitious agenda” [4], aiming to refocus European regulation towards citizens oriented outcomes, to re-connect with its citizens by also taking into consideration present specific new challenges arising from 2004 and 2007 enlargements. Consumer policy’s scope includes managing these changes and improving the functioning of the internal market, addressing market failures, insuring proper access to goods and services and empowering consumers to make rational choices.

Yet, the rights and obligations included in the EU consumer policy generated *difficulties* in the adoption of consumer protection rules in the new Member States as this approach was less rooted into consumers, enforcement bodies and businesses’ behavior.

1 Corina Ene, Lecturer phd, Petroleum-Gas University of Ploiesti, Faculty of Economic Sciences, B-dul Bucuresti, No. 39, 100.680, Ploiesti, Romania, Tel: +40726259030, E-mail: enecorina@yahoo.com

Situated in the eastern Balkans, Bulgaria experienced a difficult transition to a market economy, and struggled to enhance low standards of living after the end of Communist rule in 1991, dealing with both unemployment and inflation situations.

Although Bulgaria was not invited to join the EU in 2004, it signed the accession treaty in April 2005 and joined the EU in *January 2007*. Yet, the entry requirements were still *tough*, since a series of reports showed that Bulgarian government had failed to fight against corruption and organized crime. As a consequence, EU announced in 2008 that it was suspending aid worth hundreds of millions of Euros. Subsequently, in 2010, the EU urged that Bulgaria take urgent action to address these issues, and by the end of the year France and Germany announced that they would prevent Bulgaria from joining the Schengen passport-free zone until “irreversible progress” in this field has been accomplished.

In this context, the issue of consumer protection in Bulgaria proves to be *actual* and *significant*, since, every year, a great number of goods in the Bulgarian market are identified as potentially dangerous, as the Commission for Consumer Protection in Bulgaria enunciated on the occasion of March 15 (World Consumer Rights Day) in 2012. However, Bulgarian citizens are gradually becoming more acquainted with their rights and interests as consumers, in a market directed by harmonized regulations with the EU *acquis*.

Consumer Protection Framework in Bulgaria

In any economic space, consumer protection framework consists of the *institutional* framework (institutions, public authorities, organizations and other stakeholders) and *consumer policy* framework (enforcement of general and specific legislation with impact on consumer protection).

In November 2010, the European Commission (Directorate General Health and Consumer Protection) has put up a country profile for Bulgaria [1]; we are presenting below several essential elements depicted in this report, aiming to build up a schematic image of this country’s consumer protection framework.

Consumer policy institutions

In Bulgaria, the ministry charged with responsibilities regarding consumer policy is the *Ministry of Economy, Energy and Tourism*. Being in charge with carrying out various national policies (e.g. trade; tourism, innovation and privatization; economic and industrial policies), its aim is to deliver an effective functioning market while promoting and defending consumer’s rights and interests.

This ministry also draws up *the national consumer policy* (based on consumers interests), afferent legislation, and coordinates its enforcement, including the cooperation between administrative authorities (including consultation with consumers organizations) having competencies in the field of consumer protection.

The ministry works to ensure that Bulgarian consumers become effective “actors” on the market, having the necessary the skills, knowledge and information so that they make rational buying decisions and have access to appropriate redress mechanisms if needed. The ministry’s activity includes the implementation of its own Strategy for Consumer Protection for the period 2010 -2013.

Other *relevant public authorities* with the Ministry of Economy, Energy and Tourism are mentioned below:

Consumer Policy Unit (CPU) plays a key-role in achieving the ministry’s goals in the field of consumer protection, being responsible for the concrete formulation of consumer policy (regarding the whole set of consumers rights: safety, economic interests etc.). The CPU is in charge with specific *initiatives* in support of consumers, such as:

- modernizing existing regulatory framework for consumer protection and release regulation proposals;
- supporting to the ministry in implementing the consumer policy and elaborating medium-term strategies for its development;
- lobbying for consumer interests including in all relevant government actions;
- ensuring the accurate functioning of advice and redress systems;
- sustaining the development of independent consumer organizations and carrying out an efficient dialogue;
- administering the allocated State budget for the support and development of consumer services and consumer NGO’s;
- establishing information and education activities designated to raise consumers’ awareness about their legitimate rights.

In the same time, the CPU aims to promote high standards of consumer protection, ensuring efficient integration of consumer interests into other national policies. It also coordinates the National Council for Consumer Protection activity and selects relevant issues for investigation by the Commission for Consumer Protection.

The Commission for Consumer Protection (CCP) is the main enforcement authority having a wide range of statutory powers and duties, recently extended according to legislation under the Law on Consumer Protection and the Law on Consumer Credit. Thus, the CCP is responsible for the enforcement of consumer legislation (including general product safety and consumers economic interests’ protection), being competent to monitor compliance with consumer protection legislation, to issue specific regulations and procedures for the case of law violation and to coordinate other competent bodies on enforcement of consumer legislation. CCP’s most relevant *powers* include:

- issuing regulations acts establishing violation of consumer protection legislation;
- examining consumer complaints concerning violation of their rights and unfair contract terms;
- controlling price indicating, performing test shopping, inspect business documents;

- prohibit (banning, withdrawing) or limit the marketing of goods and services, especially of those posing risks to consumer's health and safety;
- supervise law enforcement in the matter of general product safety and unfair commercial practices;
- adopting necessary measures in case of legislation infringement;
- initiating court actions for the protection of collective interests of consumers.

The CCP responsibilities cover several key-areas, correlating with general and specific regulations in the field of consumer protection. The CCP is also responsible for the enforcement of the Regulation 2006/2004/EC of the European Parliament and of the Council of 27 October 2004 on cooperation between national authorities responsible for the enforcement of consumer protection laws and of the Directive 2001/95/EC on General Product Safety. The CCP also acts as RAPEX national contact point, sending and reacting to notifications for dangerous products.

At local level, there are *Consumer Protection Units* functioning as *local authorities*, competent both in the field of enforcing the Law on Consumer Protection (with regard to price indication, product labeling, consumer claims settlement) and in providing information and advice to consumers.

In terms of consumer protection legislation, several *public agencies* are in charge with specific areas of consumer protection; the most relevant are:

- the Ministry of Agriculture and Food; responsible for agricultural policy, food and feed safety, functioning as Codex Alimentarius and RASFF (EU Rapid Alert System for Food and Feed) Contact Point and performing risk assessment, risk communication and risk management [10];
- the Ministry of Health; responsible with health policy, food legislation implementation, food safety and the harmonization of legislation with European provisions;
- other agencies: "Bulgarian Accreditation Service" Executive Agency, Bulgarian Institute for Standardization, General Directorate "Market Surveillance" with the Agency on Metrological and Technical Surveillance, the Commission for the Protection of Competition, Commission for the Regulation of Communications, Ministry of Justice, Custom Agency, Bulgarian Food Safety Agency (the public authority responsible for food and feed safety throughout the food chain [10], established in 2011).

National consumer organizations are also relevant institution in this field, including consumer associations acting at both national and regional/local level.

A. At national level

The Federation of Consumers in Bulgaria (FCB) is the most relevant not-for-profit consumer association in Bulgaria. Founded in 1990, the FCB has 23 regional units and more than 12,000 members and it has been a member of Consumer International (CI) from 1991. Its main activities include: protection of consumers rights, solving

consumer complaints, proposals for the elaboration of new legislation in the field of public utilities; acting in court and out-of-court for the collective consumers interests protection; lobbying in favor of consumer interests; public information campaigns; consumer representation within consultative bodies.

Bulgarian National Association “Active Consumers” (BNA, formerly Bulgarian National Consumers Association) was established in 1998 and has been operating under the new name since 2009, having as main goals to protect Bulgarian consumers’ rights and interests by providing reliable information, education, representation, legal advice, lobbying for and proposing consumer legislation improvement, raising public awareness on consumer protection related issues. Current campaigns include exposing misleading labeling on organic food products, education on young consumers nutrition, Internet safety, and financial services. The BNA is in charge with publication of brochures, books and a consumer monthly magazine (“Consumer”). In 2010, the BNA sustained a nationwide information campaign on consumer rights.

Independent Union of Consumers in Bulgaria (IUCB) is an organization that develops programs and projects aiming at protection of health, safety and economic interests of the consumers by encouraging their right to information, education and civil representation. The IUCB participates in the activity of conciliation commissions, advisory and working bodies at national and regional level concerning consumer protection issues.

B. At regional/local level

A number of *consumer protection associations* having similar objectives (consumers and business representatives’ information, education and training, consumer policy development) are acting at regional/local level: Bulgarian Consumer’s Academy (BCA), National Association for Consumer Information and Advices of Citizens (NACIAC), Union of insured persons (UIB), National League - Consumers of Services, Regional Union of Consumers - “Vidin 98”.

Other not-for-profit, non-governmental consumer associations dealing with consumer protection - related issues include: Consumer Centre for Information and Research and Association “Consumer Help”.

Bulgaria’s consumer protection framework also comprises a *consultative body* to the Ministry of Economy, Energy and Tourism - *the National Council for Consumer Protection* (NCCP). Set up in 2000, it consists of representatives of different government agencies and consumer associations aiming at strengthening consumer representation. The NCCP’ most relevant objective is to right balance between businesses and consumers by promoting the conclusion of agreements between consumers’ and traders’ associations and to advise the ministry on elaborating and implementing an effective consumer policy.

Also, in 2005 a *Council for Coordination and Exchange of Information between the Market Surveillance* was put in place in order to establish a mechanism for better interaction between different enforcement agencies carrying out market surveillance activities. Its activity is

complemented with the work of several *implementing agencies* such as: Commission for Consumer Protection (having a coordinating role), the National Centre of Public Health Protection with the Ministry of Health, the Directorate “Nature Protection” within the Ministry of Environment and Water, the Custom’s Agency, Bulgarian Drug Agency, the State Agency for Metrological and Technical Surveillance, the Executive Agency Plant Variety Testing, Approbation and Seed Control, the National Police Service, the National Veterinary Medical Service.

Other stakeholders involved in the consumer protection framework in Bulgaria refer to relevant *media* for the distribution of consumer information. The most important ones are the television, the radio and the print media (various newspapers, e.g. the monthly consumer newsletter published by BNA). Also, on the web site of the CCP, consumer information can be accessed in Bulgarian language.

An important type of institutions are those involved in dispute settlement (redress bodies), both in and out-of-court. Several entities (such as CCP, BNCA, UIB, National League - Consumers of Services, Regional Union of Consumers - “Vidin 98”, National League - Consumers of Services, Association “Consumer Help”, Federation of Consumers in Bulgaria) are qualified to initiate actions in court against practices that violate consumers collective interests.

According to the Law on Consumer Protection, out-of-court consumer dispute settlement framework rely on a national system of 24 *conciliation commission* that support consumers seeking to resolve their disputes with traders and suppliers through an alternative dispute resolution (ADR) scheme, managed by the CCP.

Besides, acting as an advocate for human rights and defender of public interest, *Office of the Bulgarian Ombudsman* function as an independent constitutional body and may act by serving consumers in specific issues.

An important pole regarding consumer cross-border issues is the *European Consumer Centre* (ECC) in Bulgaria, functioning as a part of the ECC-Network across the EU countries, Iceland and Norway and carrying out various activities for supporting consumers. Created in 2008, it has become a relevant institution, especially after a series of promotional activities and is designated mainly to provide information for consumers about the Internal Market opportunities and both EU and national regulations. It collaborates with ECC in other countries and gives advice and support to consumers in case of cross-border disputes, helping them to effectively use ADR schemes. Over last year, most complaints referred to airline companies and online shopping.

Consumer policies

As mentioned before, consumer protection framework relies upon a set of regulations transposing EU *acquis* in the field of consumer protection legislation. Consumer protection legislation in Bulgaria consists of numerous vertical and horizontal *regulations*, of which we mention the most relevant:

- o Law on Consumer Protection (issued in 2005, last amended and entered into force in 2010, resulting from implementing EU Directives at national level); this law is addressing issues related to control of unfair terms in consumer contracts, control of unfair commercial practices, product liability, distance selling contracts, consumer guarantees and claims, timeshare, the protection of collective interests of consumers, price indication, general product safety, product labeling, consumers associations. It aims to ensure the protection of *basic rights of the consumers*, namely:
 - the right to information concerning goods and services;
 - the right to legal defense against risks of acquiring goods and services, which could endanger life, health and their property or their economic interests;
 - the right to compensation for damages caused by defective goods;
 - the right to redress procedures for disputes settlement;
- o Law on Tourism (last amended in 2010), aiming mainly to provide protection for the users of tourist products/packages and to establish the rights and the obligations of consumers in this field;
- o Law on Consumer Credit (promulgated, amended and in force since 2010);
- o Law on Tobacco and Tobacco products (last amended and supplemented in 2009, regarding labeling and presentation of tobacco products);
- o Law on e-Commerce;
- o Law on Distance Selling of Financial Services (issued in 2006, last amended in 2009, effective since 2010); provides security for consumers using distance financial services;
- o Rules of Procedure of the Commission on Consumer Protection;
- o Rules of Procedure for the work of conciliation commissions;
- o Ordinance on the procedure for the provision of information to consumers and for the price indication of the service repair of electrical appliances;
- o Ordinance on the procedure for the provision of information on products and services which present risks for consumers and on the procedure for the cooperation between manufacturers, distributors and service providers and controlling authorities;
- o Ordinance on products imitating foodstuffs;
- o Ordinance on the terms and procedure for withdrawal and recall of dangerous products, the destruction thereof and for compensation of consumers;
- o Ordinance on the terms and procedure for the provision by the State of financial resources to consumer associations;
- o Ordinance for safety lighters;
- o Regulation on the requirements on safety with regards to magnetic toys.

Other *regulations* having impact on consumers protection include: Law on Foods; Law on Technical Requirements to Products; Law on Wine and Spirit; Law on Health; Law on the Protection of Competition; Law on National Standardization; Law on Bank

deposit guarantee; Ordinance on labeling and names of textile products; Ordinance on labeling of the household electrical appliances concerning the power efficiency and other sources; Ordinance on labeling of the type of materials used in the main parts of shoes; Ordinance on labeling of products made from crystal glasses; Ordinance on the requirements of cosmetic products; Regulation on the prohibition of placing on the market of product containing dimethyl fumarate.

Consumer Protection in Bulgaria – attitudes, issues and challenges

Ensuring effective consumer protection in Bulgaria remains a sensitive and problematic goal, since, in spite of the consumer policy framework functioning, many consumers still feel insecure and discontent due to numerous situations of consumer rights infringement. In the last years, several surveys showed that Bulgarian consumers face difficulties in asserting their rights and interests in a complex economic environment, which requires more focus on efficient approaches in this field.

For example, a survey conducted by the “Bulgaria for Citizens” Association (recently founded by former EU commissioner for consumer affairs Meglena Kuneva) in March 2012 revealed that nearly half of Bulgarians complain that their consumer rights have been violated in the past year and that they are not familiar with the laws and mechanisms protecting their rights. Most cases of infringement emerged from trade, food and mobile phone operators sectors [2].

Undoubtedly, insufficient consumer protection is closely correlated with reduced purchase power many of Bulgarian citizens. A Eurostat report in 2009 stresses that in Bulgaria, salaries from paid employment are generally the main *source of income* for most households, whereas social transfers remain the main source of income among households with lower incomes. In the first half of 2008, Bulgaria had the *lowest minimum wage* per month (€113) compared €1,570 in Luxembourg [5]. On the other hand, there was no net saving in Bulgaria, as expenses were merely equal to incomes.

Also, the report mention that countries situated at the geographical extremities of Europe tended to report much lower rates of *cross-border purchases* (9 % of consumers in Bulgaria, in 2008). Regarding mean consumption expenditure per household in 2005, Bulgaria provided the *lowest values* for several *sectors*, including food & non-alcoholic beverages, clothing & footwear, household textiles, purchase of vehicles, recreation & culture, secondary education, financial services. Similarly, Bulgaria ranked the last when it comes to the *structure of consumption expenditure for households* in 2005 for *sectors* such as: clothing & footwear, furnishings, household equipment & maintenance, transport, recreation & culture, postal services, personal care but still the first for housing, water, electricity, gas & other fuels.

A recent Euro-barometer survey conducted in 2008 reveals that less than 5 % of Bulgarian consumers stated that *ethical considerations* were among the three most important aspects that influence their choice of buying [5], which underlines the lesser significance that Bulgarians show regarding this kind of issues.

Besides, of the Member States that joined the EU since 2004, Bulgaria reported by far the lowest *levels than the EU-27 average* for the proportion of consumers agreeing that their rights were respected by sellers/providers, only one in five respondents agreeing their rights were respected by sellers/providers in 2008.

In a 2008 survey on consumer satisfaction, Bulgaria was placed *well below* the other Member States for the number of consumers that were of the opinion that clothing and footwear retailers would replace, repair, reduce the price or give them their money back if they had bought defective goods, which indicates an insufficient acknowledgment of consumers' rights [5].

In 2011, the results from EU market monitoring survey, based on the Market Performance Indicator (MPI, measuring key aspects of consumer experience), revealed that *five service markets rank much higher in Bulgaria than in the EU*: bank accounts, private life insurances, house and garden services, Internet services and TV subscriptions. Also, a *positive trend* appear more visible among product markets, where scores have increased for entertainment goods, large household appliances, house and garden products, package holidays, clothing and footwear, cultural services, vehicle rentals, and second hand cars [3].

An EU report on consumer empowerment published in 2011 underlines key-aspects about consumer's subjective feelings regarding their empowerment (a. their feelings of confidence as consumers, b. the extent to which they feel knowledgeable and c. the level of protection they perceived themselves to have as consumers). The *results* show that Bulgarian citizens face *difficulties* in their capacity as consumers [9]:

- 64% of the respondents do not feel *confident* as consumers;
- 72% of the respondents do not feel *knowledgeable* as consumers;
- 81% of the respondents feel *unprotected* as consumers.

In the same time, Bulgaria has the lowest numbers of interviewees expressing confidence in all three areas.

Consumers' capacity to make informed decisions requires also *understanding of packaging and labeling information*. Bulgarian consumers' awareness and knowledge of consumer logos is *limited*, as 56% of Bulgarians did not know the meaning of any of the displayed logos during the field study.

In the same time, Bulgaria is among the countries with lowest *awareness of EU legislation* in general amongst the respondents and with *lowest levels of seeking redress* [9].

The European Commission analytical report Flash Euro-barometer 299, published in March 2011 treating the issue of consumer protection in cross-border trade shows that

distance shopping was less common for consumers in Bulgaria (found at the bottom of the country ranking also in 2008 and 2009), revealing data that suggest the *lowest involvement in distance selling* [6]:

- overall level of distance shopping: 19%;
- 9% of Bulgarian consumers had conducted Internet purchases from national sellers and 3% from sellers or providers in other EU countries;
- 4%-5% of Bulgarian consumers had ordered goods or services by telephone;
- mail order was the least frequently in Cyprus and Bulgaria (7%-8%).

Other significant *attitudes* identified in the same study are presented below:

- only 10% of Bulgarian consumers stated that they felt more confident when buying from suppliers in other countries than in their own country;
- 28% of Bulgarian consumers responded to an advertisement or offer that turned out to be misleading or deceptive;
- 62% of Bulgarian consumers disagreed that it was easy to resolve disputes with sellers or providers through an arbitration, mediation or conciliation body;
- roughly one in two of Bulgarian consumers expressed distrust in the public authorities protection of their consumer rights;
- Bulgaria yielded the lowest proportion of consumers (35%) who agreed that they trusted independent consumer organizations to protect their rights as consumers;
- only 34% of Bulgarian consumers considered that sellers and providers in their country respected consumers' rights;
- less than a third of Bulgarian consumers agreed that they felt adequately protected by existing consumer protection;
- less than a tenth of Bulgarian consumers thought that essentially all non-food products currently on the market in their country were safe, while more than a quarter of respondents considered that a significant number of such products were unsafe;
- consumers in Bulgaria were the most likely to think that that a significant number of food products marketed in their country were unsafe;
- less than a fifth of respondents said that the environmental impact of products (or services) had influenced their purchasing decisions.

In 2009, EU launched a consumer information campaign in Bulgaria using the slogan “*In the European Union you have consumer rights. Use your rights*”, aiming at raising awareness of EU consumer rights amongst Bulgarians and promoting Bulgarian National Association “Active Consumers” as a focal point of information, reference and guidance for consumers. The campaign’s most important *objective* was to encourage Bulgarian consumers to become more informed and assertive, approaching and promoting issues related to consumer rights in case of faulty products, bank services and package holidays using media as TV, web and print advertising, public and media relations activities.

Meglana Kuneva, the first EU Commissioner with a specific portfolio on consumer affairs and the first Bulgarian Commissioner (2007-2010), underlined that *companies*, regardless of their size, should become *consumer friendly* and *should adhere to best practices* – which may turn out to be rather a competitive advantage than a costly approach.

Yet, a survey following this information campaign proved that campaign awareness was somewhat low, as only 43% of Bulgarian consumers said they had seen or heard messages about consumer rights in the weeks prior to the survey, while 56% had not [7]. Nevertheless, consumers who acknowledged the campaign received well its messages, considering information as useful, easy to remember, easy to understand and convincing.

Unfortunately, data showed, similarly to the previous survey wave, that the large majority of Bulgarian consumers are skeptical about the level of consumer protection and of the efficiency of the legal system in the field of consumer protection in their country, compared to other EU Member States.

Subsequently, the next survey wave (based on December 2010 data) highlighted several specific notes on Bulgarian consumers behavior and acknowledgement on consumer issues, showing that 72% of respondents thought consumers in Bulgaria were *less protected than consumers elsewhere in the EU*. In addition, 86% of the interviewees were negative when assessing whether Bulgarian sellers respected consumer rights and 79% of the respondents thought that the Bulgarian justice system was not efficient in punishing businesses that misled or cheated their customers [8].

Another problematic aspect in Bulgaria is represented by the *need for proper consumer protection in the financial services sector*, as the use of consumer financial services has been increasing in Bulgaria and also did the number of consumers' complaints about the financial institutions practices [12]. A recent report addressing the consumer protection and financial literacy in emerging markets [11] underlined several *issues* that consumer face in Bulgaria, including the need of adequate institutional framework for financial consumer protection, the need to protect personal data, the need for complete, accurate, comprehensible information, for financial education and also for access to efficient mechanisms of redress [12].

The study stresses that in order to ensure financial consumer protection in Bulgaria, there are some specific *suggestions* and *recommendations* to take into consideration [11]:

- o financial institutions should be required to apply fair and adequate practices when selling and advertising financial products and services to consumers. The report mentions that financial institutions personnel “are unable to explain to customers their financial products and if consumers had disputes over entries in credit register, correction of errors was difficult at best”;
- o consumers should be entitled to make a choice regarding the provider of any financial product (as, for example, auto dealers prevent consumers from freely choosing the liability insurance provider);

- o statistics on consumer complaints should be publicly available and used to establish the financial sector trends and to determine future improvements in the consumer protection framework (revision to legislation or institutions);
- o as consumers in the EU new member states tend not to pursue complaints, there is a need to establish efficient dispute resolution mechanisms, as mediation and conciliation committees don't address the issue of imbalance of power and information between a financial institution and a consumer. Besides, the financial institution can avoid responding to any consumer complaint simply by refusing to attend any session of the relevant conciliation committee.

In this respect, a World Bank report published in 2009 highlighted that financial consumer protection represents a necessity as it improves efficiency of financial intermediation, and indirectly reduces risks to financial stability [12].

Conclusions

In the EU, consumer protection is gaining increasing importance and Bulgaria followed this trend by putting in place the necessary consumer protection legislation and institutions.

Due to the gap between Bulgaria and other Member States (because of Bulgaria being a relatively young Member State), this country faces obvious challenges and constraints transposed into limited consumers empowerment and skeptical attitudes revealed by last years' EU studies and reports' main findings.

Therefore Bulgarian consumers need a strengthened consumer protection framework for all sectors (including financial sector), better access to relevant information sources about consumer rights, better knowledge about institutions, organizations and associations, better implementing of the existing legislation, improved regulation and practices.

A greater attention should be devoted to vulnerable consumers (especially to those less educated, old, living alone, retired, internet non-users etc.) as they are more prone to be affected by consumers rights infringement and reduced access to means of redress.

Only if and when this framework become more pragmatic and effective, being able to empower consumers, Bulgarian citizens could become more self-confident and assertive about their rights as consumers. Nevertheless, meanwhile they should focus on acquiring better consumer skills, on becoming more knowledgeable and on making their voice heard, to exert the necessary pressure so that the system provides real protection.

To this end, Bulgaria needs efficient cooperation and exchange of information with EU countries concerning application of the consumer protection legislation to help guarantee observance of consumers' rights, which could result in increasing their trust in the domestic market.

References

1. *** Bulgaria (country profile), November 2011, [available at http://ec.europa.eu/consumers/empowerment/cons_networks_en.print.htm].
2. *** *Nearly half of Bulgarians complain of consumer rights violations in past year; survey shows*, 14 March 2012, [retrieved at http://3e-news.net/show/21917_nearly%20half%20of%20bulgarians%20complain%20of%20consumer%20rights%20violations%20in%20past%20year%20survey%20shows_en/].
3. *** *The Consumer Markets Scoreboard*, Making Markets Work For Consumers, 6th edition, October 2011, [retrieved at http://ec.europa.eu/consumers/consumer_research/editions/docs/6th_edition_scoreboard_en.pdf].
4. Commission of the European Communities, Communication from the Commission to the Council, the European Parliament and the European Economic and Social Committee, *EU Consumer Policy strategy 2007-2013*, Brussels, 13.3.2007, COM(2007) 99 final.
5. European Commission, *Consumers in Europe*, Luxembourg: Office for Official Publications of the European Communities, Eurostat, 2009, retrieved at http://ec.europa.eu/consumers/strategy/consumers_europe_edition2_en.pdf.
6. European Commission, Flash Euro-barometer 299, *Consumer attitudes towards cross-border trade and consumer protection*, Analytical report, March 2011.
7. European Commission, Flash Euro-barometer 275, *Consumer protection and consumer rights in Bulgaria*, Wave 2, Summary, May 2010.
8. European Commission, Flash Euro-barometer 275, *Consumer protection and consumer rights in Bulgaria*, Wave III, Analytical report, May 2011, [retrieved at http://ec.europa.eu/public_opinion/flash/fl_295_en.pdf].
9. European Commission, Special Eurobarometer 342, Consumer Empowerment, Report, April 2011.
10. Federal Institute for Risk Assessment, *EU Food Safety Almanac*, 2011, retrieved at <http://www.bfr.bund.de/cm/364/eu-food-safety-almanac.pdf>.
11. Rutledge, Susan L., *Consumer Protection and Financial Literacy*, Lessons from Nine Country Studies, Policy Research Working Paper 5326, World Bank, June 2010.
12. World Bank, Bulgaria. *Diagnostic Review of Consumer Protection and Financial Capability*, Volume I, Key Findings and Recommendations, May 2009, [retrieved at http://siteresources.worldbank.org/BULGARIAEXTN/Resources/305438-1224088560466/CP_vol1_en.pdf].