



Understanding
Consumer
Detriment
in Ireland



Coimisiún um
Iomaíocht agus
Cosaint Tomhaltóirí

Competition and
Consumer Protection
Commission

Table of Contents

Glossary.....	3
1. Context and Background.....	11
1.1 Introduction	11
1.2 Why Measure Detriment?	11
1.3 Definitions of Detriment	12
1.4 Types of Detriment	13
1.5 Limitations of the research	14
2. Methodology.....	17
2.1 Approach and Rationale	17
2.2 Market Developments	21
2.3 Detriment Calculations	22
2.4 Research Questions	23
3. Consumer Detriment Overview	25
3.1 Market engagement across products/services.....	25
3.2 Incidence of detriment reported by consumers in Ireland.....	27
4. Understanding Detriment Across Sectors.....	36
4.1 Contribution by sectors to incidence of detriment and most serious issue.....	36
4.2 Analysis of detriment within sectors, relative to market engagement	37
4.3 Analysis of most serious issue.....	39
5. Understanding the Impact of Detriment: Financial Costs	46
5.1 Initial price of purchase	47
5.2 Usability of product and duration of issue	49
5.3 Other costs and reimbursement.....	50
5.4 Estimating net monetised detriment.....	52
5.5 Net Monetised Detriment.....	54
6. Understanding the Impact of Detriment: Non-financial Costs	62
6.1. Time Lost.....	62
6.2 Stress.....	65
7. Consumer Detriment and CCPC Activity	68
Appendices.....	75
Appendix A: International Context	75
Appendix B: Online vs. F2F.....	76
Appendix C: Additional information on types of detriment	80

Appendix D: Overview of Relevant Legislation	84
Appendix E: Data Cleaning and Considerations.....	86
Appendix F: Number of markets engaged with and detriment.....	89
Appendix G: Categories of Sectors	91
References	92

Glossary

Term	Definition
Consumer detriment	<p>The harm or disadvantage experienced by consumers as a result of certain practices, products or services. It covers various negative impacts such as financial loss, health risks or a reduction in overall well-being.</p> <p>This study primarily focuses on revealed personal detriment reported by consumers.</p> <p>For the purposes of the study, the questionnaire asked consumers to recall problems that may have occurred that “caused you stress, cost you money, or took up your time”.</p>
Detriment measures	Detriment can be measured in several ways including: incidence, most serious issue, sectoral, financial (net monetised detriment) and non-financial (time and stress)
Fast-moving consumer goods (FMCG)	Everyday products used by consumers such as grocery products
Incidence of detriment	The proportion of consumers who experienced issues in a given market in the 12 months prior to survey completion
Market engagement	The proportion of consumers who bought/used a product or service in a particular market during a specific period
Mixed methodology	In the context of this study, mixed methodology refers to the use of both face-to-face (F2F) and online survey methods
Net monetised detriment	Net monetised detriment captures relevant costs associated with each instance of detriment and then offsets these costs against the degree to which the consumer could use the good/service as originally intended (i.e. usability) and any reimbursement received (e.g. compensation)
Sectoral detriment	Detriment within a market based on people who have purchased in that market
Volume (or instances) of detriment	The total numbers of instances of detriment reported by a consumer

Executive Summary

Why study consumer detriment?

Things can go wrong when people buy products or services: they may lose money or time, get injured, or feel stress or worry. Negative results like these are all types of **consumer detriment**. The Competition and Consumer Protection Commission (CCPC) wants to make sure consumers are better off by improving how markets work for them. To do this, we look at the effects of consumer detriment. Examining the problems consumers face helps us decide where to focus as an organisation. It also helps us identify gaps in the law, areas for further research and where we should call for change. Doing this work can improve outcomes for consumers by putting stronger protections in place and building more trust in markets.

What is consumer detriment?

‘Consumer detriment’ is a term used to describe the negative results or problems that people may face when they buy products or services. Consumer detriment can include things like losing money, getting injured, losing time, or worry or stress.

To learn about recent problems faced by consumers, we carried out a wide-ranging study looking at key sectors of the Irish economy from 2022 to 2023. The study’s main goal was to measure the level of detriment reported by Irish consumers. We also wanted to learn more about:

- how people buy products and services in Ireland
- the problems that consumers experience in different sectors
- consumer groups at higher risk of detriment
- the financial and non-financial costs of consumer detriment.

Key Findings

Levels of consumer detriment in Ireland

Most consumers (61%) said they did not face any problems when buying products and services in the year before the survey. 39% said they had at least one issue that cost them money or time or caused them stress. This works out as roughly 1.6 million of the total adult population of Ireland.

Our research also showed that:

- Men were more likely to report issues (41% of men said they faced problems compared to 36% of women).
- Younger consumers were almost twice as likely to report facing problems compared to older consumers.
- People in Dublin (44%) were more likely to report facing problems compared to people in all other regions (35-37%).
- People with higher educational qualifications (41%) were more likely to report facing problems compared to people with lower educational qualifications (35%).

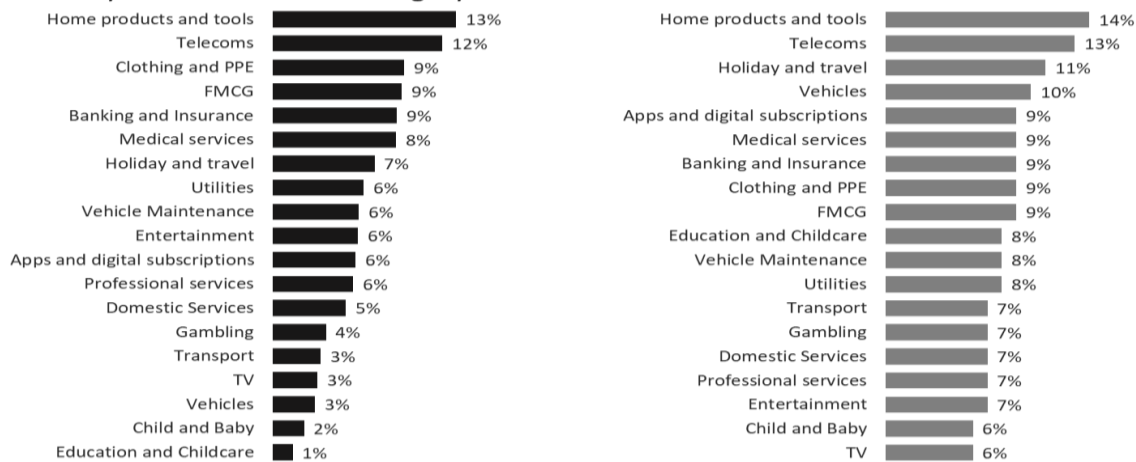
Levels of consumer detriment across sectorsⁱ

Overall, the most problematic sectors were **Home Products and Tools** (13%) and **Telecoms** (12%) (see Figure A1 below). When we took into account that consumers buy in some sectors more than others (for example, more people buy food than gamble), the order changed slightly. However, **Home Products and Tools** (14%) and **Telecoms** (13%) were still the biggest problem areas (see Figure A2 below). This indicates that negative experiences in these sectors can significantly affect consumers. Other sectors that ranked highly were **Holiday and Travel** (11%) and **Vehicles** (10%).

ⁱ When we analysed the levels of detriment across sectors, we considered that some sectors are used by more consumers than others. This ranges from 98% for fast-moving consumer goods (FMCG) (e.g. grocery sector products) to 17% for childcare.

Figure A1: Consumer detriment ranked by highest level per market

Figure A2: Adjusted ranking based on market participation*



Note: The first chart (A1) uses all of the survey responses we received (4,537) to show which areas had the highest number of problems faced by consumers.

**The ranking in the second chart (A2) allows for the fact that some sectors are participated in by more consumers than others.*

Reporting issues to sellers

As part of the study, we asked consumers to select all areas in which they had suffered detriment and then answer detailed questions in relation to their most serious issue. The following sections therefore relate to the most serious issue only.

Over a third (39%) of consumers who reported issues had problems with the product or service received, meaning that it did not meet their expectations. For 22%, the trouble was with delivery of the product. Of those who reported problems with the good or service received, 47% bought online and 33% bought in person.

Most people (71%) who had issues got in touch with the seller. Consumers were more likely to contact sellers in Ireland (75%) than those in the rest of the EU (57%), the UK (59%), and elsewhere (64%). When we compared sectors, the highest number of consumers contacting sellers was in **Telecoms** (83%), and the lowest was in **Gambling** (44%).

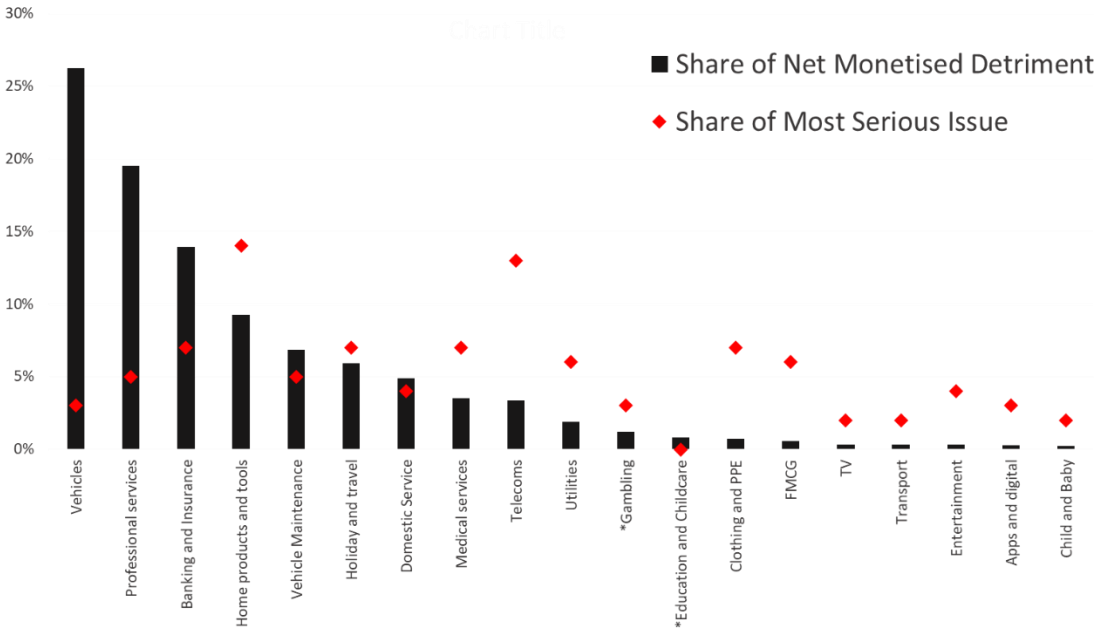
Problems relating to the most serious issue lasted between one and four weeks before they were resolved. 10% were still dealing with their most serious issue more than six months after they first contacted the seller.

The financial costs to consumers

To work out how much the most serious problem reported by consumers cost them financially, we looked at many factors.ⁱⁱ These included what consumers paid initially, any extra costs like hidden fees, and anything they spent to fix the problem, like repair fees or legal fees. We also included any compensation they received.

Overall, the total cost of detriment to consumers in the Irish economy was around €968 million (this amounts to 0.6% of total personal consumption in Ireland).ⁱⁱⁱ The average cost reported per consumer was €60, though there were significant differences across sectors.

Figure B: Share of financial cost to consumers and share of most serious issue by category



ⁱⁱ Working out the total financial cost of consumer detriment across the whole economy is difficult. Estimates from these calculations are extremely sensitive to changes in the assumptions they are based on. The method we used to estimate the total financial cost of consumer detriment (net monetised detriment) is unique to this study and is not comparable to other similar studies.

ⁱⁱⁱ In 2022, personal consumption was €162 billion (at current market prices). See: CSO Annual Accounts Table NA022.

The non-financial costs to consumers

The costs reported by consumers were not just financial. Consumers also reported negative outcomes like losing time or feeling stressed. 93% of consumers reported spending some of their personal time trying to resolve problems relating to their most serious issue. Almost two thirds (62%) said they tried to resolve a problem during working hours.

On the topic of stress, 15% of people who experienced consumer detriment said they were “extremely” stressed by the issue. 28% reported feeling “quite a lot” of stress, while 38% said they were “moderately” stressed by the situation. When we compare categories, 29% of consumers who reported facing problems in **Education and Childcare** found it “extremely” stressful. This was followed by **Gambling and Vehicles** (both with 26%), **Utilities** (24%) and **Holiday and Travel** (22%).

What this research means

This research gives us useful insights into the level of consumer detriment in Ireland. It also helps us understand the kinds of problems consumers face in different sectors. We are able to see which groups are more likely to report facing problems when buying products or services. These include men, younger consumers, people with higher educational qualifications and people living in Dublin. In addition, this research has used different measures of detriment to better understand issues reported by consumers across sectors (see Table A).

Table A: The top 3 sectors for different measures of consumer detriment^{iv}

Category	Any Detriment %	Most Serious %	Sector Specific %	Net Financial %	Extreme Stress %	Any Personal Time %	Total
Banking and Insurance	✓	✓		✓		✓	4
Telecoms	✓	✓	✓			✓	4
Home products and tools	✓	✓	✓				3
Clothing and PPE	✓	✓					2
Holiday and travel		✓	✓				2
Medical services		✓					1
Vehicles				✓	✓		2
Domestic Services						✓	1
Education and Childcare					✓		1
Entertainment						✓	1
FMCG (e.g. groceries)	✓						1
Gambling					✓		1
Professional services				✓			1
Transport						✓	1
TV						✓	1
Apps and digital subscriptions							-
Child and Baby							-
Utilities							-
Vehicle Maintenance							-

These findings will help the CCPC decide how to use its enforcement and compliance, research and advocacy resources in future. We will also use these findings to shape how we speak to different groups of consumers across sectors.

^{iv} More than three sectors are listed for some measures due to joint place rankings.

CONSUMER DETRIMENT IN IRELAND 2022-23



4,537
consumers surveyed

39%
reported experiencing detriment

Of those who reported experiencing detriment:



81%
reported being at least **moderately stressed** by the issue



62%
spent some **work time resolving their issue**



10%
were **still experiencing an issue** more than **6 months later**



€968m
estimated **financial loss** for consumers' most serious issues

Some of the most problematic areas included:

HOME PRODUCTS & TOOLS



TELECOMS



BANKING & INSURANCE



HOLIDAY & TRAVEL



VEHICLES



1. Context and Background

1.1 Introduction

The CCPC strive to improve consumer welfare across the economy with the aim of making markets work better for consumers. In order to effectively carry out this work, it is important that we are able to identify and understand areas where consumers have reported negative outcomes (i.e. detriment) and to analyse the impact of that detriment.

In 2014, the CCPC conducted its first study of detriment experienced by Irish consumers across key sectors of the economy.¹ It noted that 44% of consumers experienced some form of detriment in the previous 12 months. Telecommunications (including internet and TV) was the highest single area cited with 16% experiencing a problem with this area.

In the years since, the methodological approaches to analysing detriment have developed significantly in addition to the publication of various international studies in this area. The CCPC has utilised these developments to once again examine detriment reported by Irish consumers. This study used a combination of quantitative research in the form of consumer surveys^v (online and face-to-face) and econometric analysis. The central objective of the study was to quantify the level of revealed personal detriment reported by consumers in Ireland across multiple product and service categories. Other objectives of the study included:

- examining market engagement^{vi} for the various products and services
- identifying higher risk issues and sectors where consumers have reported detriment
- exploring vulnerable consumer groups
- identifying key problem areas across sectors
- examining financial and non-financial costs

1.2 Why Measure Detriment?

Examining the impacts of detriment, enables the CCPC to prioritise our investigation and enforcement activities, inform our strategy and areas of focus along with contributing towards

^v Fieldwork was conducted by Ipsos MRBI on behalf of the CCPC

^{vi} Market engagement is defined as the proportion of consumers who bought/used a product or service in a particular market during a specific period.

policymaking by identifying gaps in legislation and determining areas for advocacy work. It can also be beneficial for the CCPC when looking towards future in-depth studies in an area. This work can lead to improved outcomes for consumers by strengthening consumer protection thus contributing towards enhanced trust in markets.

1.3 Definitions of Detriment

There is a level of subjectivity in any study on consumer detriment. This has a dual source in that the term “detriment” itself can have a wide definition and consumers’ own perception of their experience of detriment can vary. Previous studies conducted internationally^{vii} have also grappled with this issue, acknowledging that:

Consumer detriment can take many forms: it can be structural in nature (i.e. affecting all consumers) or personal; apparent to consumers or hidden; and financial or non-financial. Consumer detriment may be apparent to consumers immediately, may take time to emerge, or remain hidden.²

This has led to varying definitions of “detriment” being used across studies. A 2017 European Commission study³ stated that consumer detriment occurs “when market outcomes fall short of their potential, resulting in welfare losses for consumers”. The OECD’s 2014 study⁴ presented a wide scope of factors for its definition:

Consumer detriment means the harm or loss that consumers experience, when, for example, i) they are misled by unfair market practices into making purchases of goods or services that they would not have otherwise made; ii) they pay more than what they would have, had they been better informed, iii) they suffer from unfair contract terms or iv) the goods and services that they purchase do not conform to their expectations with respect to delivery or performance. This may occur, for example, when the goods or services that they have purchased do not conform to their reasonable expectations with respect to quality, performance or conditions of delivery. This also may occur if the goods or services are not provided in a timely fashion, are defective or dangerous, do not meet operational expectations or are inconsistent with information provided to the consumer prior to the transaction.

A more direct comparison of personal and structural detriment is set out below in table 1:

^{vii} For an overview of main international studies in this area see Appendix A

Table 1: Personal and Structural Detriment Definitions EC 2017

Personal Detriment	Structural Detriment
Personal detriment is defined by the EC in its 2017 report as “the difference between the value that consumers reasonably expected to get from a good or service and the value that they actually get from it, relating to problems experienced by consumers post-purchase.”	Structural detriment “refers to the loss of consumer welfare in the aggregate due to market failure or regulatory failure, as compared to well-functioning markets”.

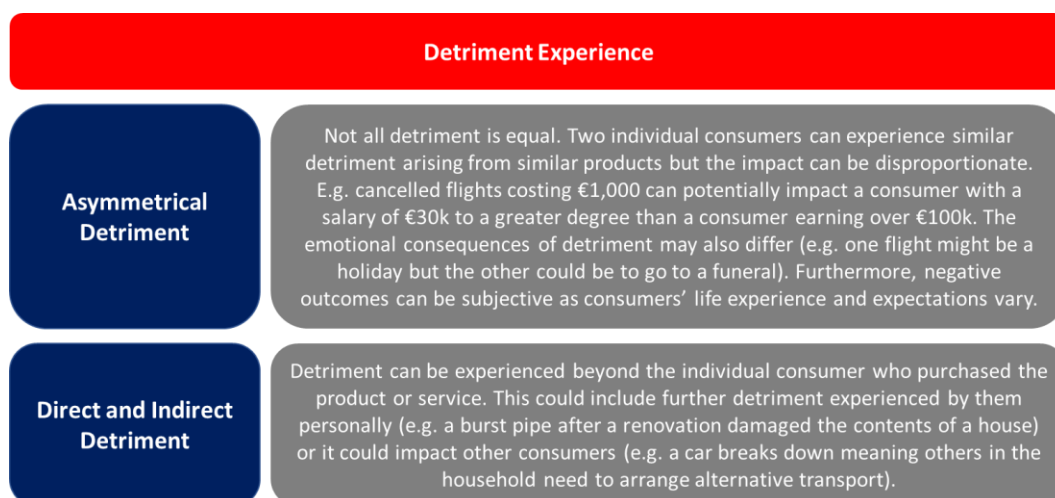
For the purposes of this study, the questionnaire asks consumers to recall problems that may have occurred that “caused you stress, cost you money, or took up your time”. The intention of this study was to focus on personal detriment alone.

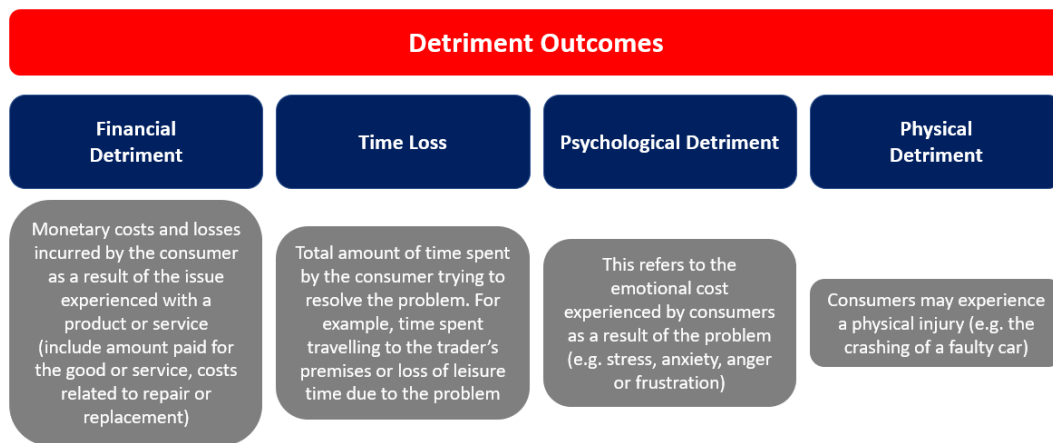
1.4 Types of Detriment

In addition to understanding the varied definitions of detriment which exist, it is also important to acknowledge that detriment can be experienced in various ways which require different approaches for research.

Detriment can be revealed or hidden. Hidden detriment includes aspects such as pending detriment (where a consumer is not yet aware of a fault with the product), unknown detriment (where a consumer does not have knowledge or experience to know they have experienced detriment) and accepted detriment (where a consumer does not report an issue). Hidden detriment is difficult to quantify and as such, is not included in this study.

Figure 1: Types of detriment



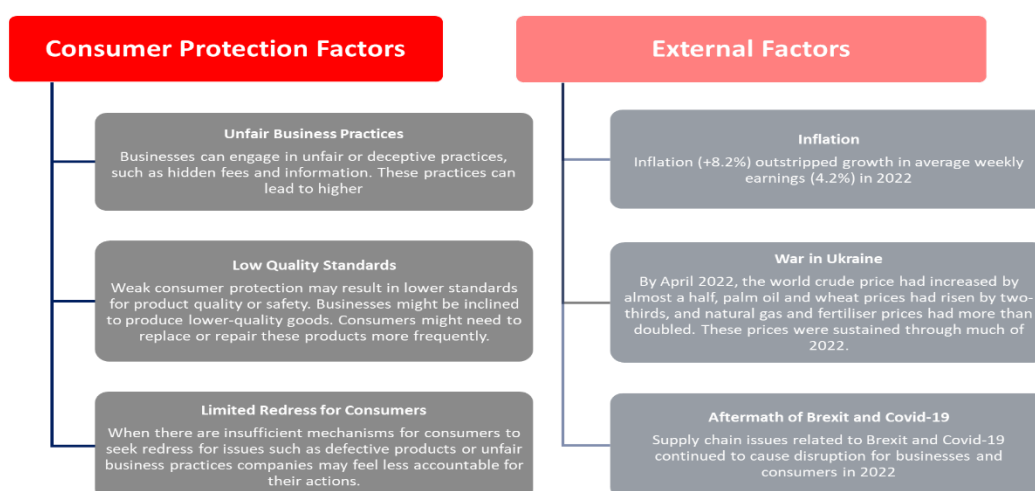


This study will focus on revealed personal detriment with consideration given to both direct detriment experience and detriment outcomes.

1.5 Limitations of the research

The CCPC has a number of goals and ambitions related to promoting competition and enforcing consumer protection legislation.⁵ As previously noted, consumer detriment definitions are broad but generally refer to the harm or disadvantage experienced by consumers as a result of certain practices, products or services. It encompasses various negative impacts such as financial loss, health risks, or a reduction in overall well-being that consumers may suffer due to inadequate information, unfair businesses practices, or substandard goods and services (noted on the left side of Figure 2). The impact of these issues is reflected in the reported level of consumer detriment. The CCPC can act, where appropriate under its legislative remit, to reduce the potential for this type of detriment in the future.

Figure 2: Issues influencing reported level of consumer detriment



However, there are a number of external factors unrelated to consumer protection or competition that can influence the detriment outcomes reported by consumers (shaded out on right of Figure 2).

The CMA previously noted that consumers cannot and should not be expected to judge whether the outcomes they experience in markets are “the optimal result of effectively competitive markets or the restricted sub-optimal outcomes of uncompetitive markets”.⁶ This too extends to whether outcomes are related to poor practice on behalf of business.

As noted, this study sought to understand the issues that cost consumers money and time as well as caused them stress. Detriment as reported by consumers was therefore broad in nature and included issues that would not currently be considered in breach of consumer protection legislation.^{viii} This approach was necessary as too narrow a focus would have resulted in the collection of data on issues currently considered to be illegal and would not have allowed us the potential to identify trends over time in areas that, with the necessary advocacy, could become prohibited under future legislation. This does however mean that consumer detriment was interpreted by consumers in ways unrelated to consumer protection and competition issues.

Fieldwork for this study was conducted in a cost of living crisis and this may have influenced consumers’ perception and expectation of businesses. While the questionnaire was deliberately worded to minimise the opportunity to record detriment that related specifically to inflation some consumers still entered issues related to this. While all consumers are likely to have experienced inflation in some form or other, it was clear from the responses of the consumers reporting these issues that it had caused them financial hardship and, at a minimum, stress. Furthermore, global disruption in supply chains as a result of the war in Ukraine, along with long term trade implications relating to Brexit, have influenced market outcomes for consumers (e.g. delivery delays, unexpected customs or taxes).

The inclusion of these issues in survey responses is not surprising as the CCPC has witnessed an increase in the number of contacts to our helpline from consumers relating to price increases in the last two years. Where these concerns are raised, the CCPC seeks to understand if anti-competitive behaviour could be driving sub-optimal outcomes in these markets. This was the case in 2022 when the CCPC carried out an in-depth analysis of the retail motor fuel market⁷,

^{viii} See Appendix D for relevant legislative overview.

and again in 2023 with a high-level analysis of the grocery sector⁸ following a large number of complaints from consumer and public representatives.^{ix}

Overall, it is not possible to isolate or fully quantify the impact of external issues on detriment results contained in this report. The survey was designed to capture information which may in certain instances provide useful insights on the factors driving particular outcomes (these will be explored where possible in Chapters 4, 5 & 6). Aggregate values should therefore be interpreted with a degree of caution.

Chapter 1 Summary

- In order to make markets work better for consumers, authorities such as the CCPC must be able to identify and understand areas where consumers have reported detriment and to analyse the impact of that detriment.
- The central objective of the CCPC's study is to quantify the level of detriment reported by consumers in Ireland across multiple product and service categories.
- Consumer detriment is multi-faceted and can have a range of individual and societal costs.
- The focus of this study was on revealed personal detriment with consideration given to both direct detriment experience and detriment outcomes. Respondents were asked to recall problems that "caused you stress, cost you money, or took up your time".
- Various factors can influence the reported level of consumer detriment. These include consumer protection factors such as unfair business practices, low quality standards and limited redress. However, there are a number of external factors unrelated to consumer protection that can influence the detriment outcomes reported by consumers such as inflation, the war in Ukraine and the aftermath of Brexit. These impacts are difficult to isolate and as such any analysis of consumer detriment should be interpreted with caution.

^{ix} In both cases, the CCPC found that price increases were largely associated with exogenous factors such as rising international commodity prices.

2. Methodology

As noted in Chapter 1, several approaches can be used to measure consumer detriment depending on the type of detriment experienced. In deciding on an approach for this study, consideration was given to the most suitable methodology for measuring revealed detriment. As part of this exercise, international developments in measuring and analysing detriment were also considered.

By way of background, the CCPC's 2014 consumer detriment study was conducted using a face-to-face survey method where respondents were approached at home by interviewers who completed the survey in person. This approach is generally considered the gold standard for social surveys in Ireland. It ensures that more vulnerable communities can be included in the data, including older consumers or those without phone/online access, and it is also generally easier to achieve a representative sample as addresses can be used based on census data to ensure representation across social class and geographical area.^x

Given the objective of estimating consumer detriment in the wider economy and informing CCPC policy and activities, we still consider this type of survey methodology as the most appropriate tool for consumer detriment analysis.^{xi} However, we have made a number of changes in our approach to examining consumer detriment which are discussed in this chapter.

2.1 Approach and Rationale

2.1.1 Survey Method

In contrast to the 2014 study, this research applies a mixed method approach using data from both face-to-face (F2F) and online surveys. A mixed approach was chosen due to the significant variation in results between both survey methods reported by the European Commission (EC) in 2017. The EC found that the choice of survey method impacted the likelihood of reporting problems in the relevant sectors. Respondents to the online survey were three times more likely

^x The same process is not included in phone or online surveys which means quota controls or weights can be more heavily utilised.

^{xi} Other options considered included understanding the effect of hidden detriment which would have used mystery shopping as a tool. However, this would have focused on one particular sector. In addition, using consumer complaints limits analysis to those instances where consumers considered the benefits and costs of complaining.

to report a problem than F2F respondents.^{xii} The EC noted that for future assessments of consumer detriment, it would recommend the use of two modes to assess the incidence of problems, such as combining the results of an online survey with the results of a F2F survey.^{xiii} For an in-depth overview of the F2F versus online survey methods see Appendix B.

In light of the above, the CCPC commissioned Ipsos MRBI to conduct both F2F and online surveys with a combined nationally representative target sample size of approximately 2,000 respondents who had experienced detriment. To achieve this, over 4,552^{xiv} (composing of 2,551 F2F and 2,001 online) respondents were screened using a set of initial questions to find out if they experienced detriment. Those who did not experience detriment exited the survey. Following cleaning of the data, the final sample size for analysis of consumers who reported experiencing detriment was 1,832.^{xv} A key consideration when using a mixed methodology is accounting for the differing methods in the questionnaire structure and wording. It was necessary to alter the questionnaire in some sections for it to make sense in an online context. However, the fundamental purpose and meaning of each question remained the same.

2.1.2 Selection of sectors and market engagement

While theoretically, an open-ended question on detriment would be the most appropriate for allowing consumers dictate their own response, this approach would be almost impossible to quantify. In addition, a key concern is that some areas of detriment may remain “hidden” to consumers if sectors/products are not prompted. It is arguably for these reasons that no international detriment study has utilised a purely open-ended approach to date. Instead these studies have used product and service categories as a memory aid, with follow up questions on specific items. This is the approach adopted here.

Other consumer detriment studies (e.g. UK 2016⁹) began by asking respondents to identify problems using prompted product/service categories. We believed that this method could lead to sectors with low engagement (but potentially high levels of detriment) being overlooked.

^{xii} This is in contrast to the results for magnitude of financial detriment where they were broadly similar across both the online and F2F surveys.

^{xiii} For measuring the magnitude of detriment, the European Commission was of the view that it would be adequate to estimate the magnitude of detriment from the results of one survey method.

^{xiv} Following an in-depth review of the data 15 responses were removed during the data cleaning process

^{xv} This is the unweighted total based on the actual number of people completing questions in the detriment section. Because it is unweighted it equates to a reported detriment figure of 40%. The weighted total is approximately 1,769 which is where the 39% is applicable.

Understanding market engagement levels also helps us to examine detriment relative to market experience (i.e. vulnerability to detriment could be greater in sectors where consumers have limited experience).

To account for this, we first asked respondents what categories of products they had purchased (or used) in the past year to provide a benchmark for market engagement and then only asked if detriment was experienced in the categories that respondents had said they purchased in.^{xvi} While this approach did extend the questionnaire considerably^{xvii}, it provided important context for the results.^{xviii}

New markets and products had developed since the last CCPC consumer detriment study was conducted in 2014 that warranted inclusion in this study. As such we adopted a revised list of categories and products/services providing a more streamlined option for respondents with 19 categories encompassing 56 product/service areas.^{xix} These included:

Table 2: Product/service categories

FMCG	Food and drink, including alcohol, for consumption at home (not takeaways)
	Toiletries, cosmetics and hair products
	Supplements and herbal remedies
Home products and tools	Cleaning or maintenance items and tools for the home or garden
	Furniture and furnishings
	Domestic appliances (electrical and gas) and fixtures
	Electronic devices and software, including computers, beauty appliance, phones, media devices
	Sporting and hobby equipment including musical instruments
	Antiques and collectibles
Vehicles	New cars or other new vehicles
	Used cars or other second-hand vehicles
Clothing and PPE	Clothing, footwear and fashion accessories
	Protective clothing and equipment
	Personal protective equipment (PPE) (including face masks)
Child and Baby	Infant or baby products
	Children's toys

^{xvi} Similar approach as that used in UK DBEI 2022 study.

^{xvii} The research was split into two separate segments; one of which asked the screening questions to all respondents and achieved the topline figures for engagement and detriment, and the second asked respondents to focus on specific issues they had experienced and answer a full suite of questions

^{xviii} Respondents also asked to exclude items purchased while they were physically outside of Ireland.

^{xix} When selecting the sectors, products and problem areas for inclusion the CCPC considered complaints received through the Consumer Helpline.

Vehicle Maintenance	Fuel, accessories, and maintenance equipment for vehicles
	Vehicle maintenance and repair services
Holiday and travel	Ticket(s) for airline or ferry services
	Hotels and holiday accommodation
	Package holidays and tours
Transport	Vehicle rental services
	Ticket(s) for publicly operated transport
	Ticket(s) for privately operated transport
Medical services	Private medical services and dental services
	Prescription and non-prescription medicines
	Private carers, nursing homes and other adult care services
	Medical devices and equipment
	Glasses (spectacles) and lenses
	Veterinary services
Banking and Insurance	Current accounts and deposits
	Credit/lending services
	Pension funds and investment services
	Insurance services
	Health insurance
Gambling	Cryptoassets
	Gambling services
	Lottery services
Education and Childcare	Private and higher education fees and services
	Private childcare services
Apps and digital subscriptions	Streaming TV or other digital subscriptions (music, gaming, literature, newspapers etc.)
	In-app or in-game purchases
Telecoms	Mobile telephone services and data plans
	Internet/ broadband provision services (excluding mobile phone data plans)
	Landline telephone services
Domestic Services	Home and garden maintenance and repair services
	Waste collection services
TV	Satellite or cable TV
Utilities	Electricity and gas services
Entertainment	Cafés, fast-food, restaurants and take-away services, bars, pubs and night clubs
	Sport, cultural and entertainment activities, memberships or events
Professional services	Hair, beauty, and wellness services
	Legal, financial advice, and accountancy services
	Real estate purchases and related services
	Renting a home and associated services
	Removal and storage services

2.1.3 Type of problem

Respondents were asked about the types of problems experienced relating to their reported most serious issue. 8 categories of problems with 44 individual problem options were presented to consumers.^{xx} Qualitative information is also collected across all problem categories through the use of ‘other’ option response. Problem categories included:

1. Price or tariff
2. Payment, invoice and billing
3. Delivery and provision of goods or services
4. Faulty, damaged, unsafe or not as described goods or services
5. Contract terms and conditions
6. Cancelling order or product terms
7. Complaints handling, compensation, warranty or guarantee
8. Scams, counterfeit goods and other fraudulent practices

The 2017 European Commission study asked consumers to consider their most recent issue.^{xxi} In our view there was a risk of underestimating detriment with the ‘most recent issue’ approach. This study therefore required respondents to select all areas in which they had suffered detriment and answer detailed questions in relation to the most serious issue.

2.2 Market Developments

In addition to the changes outlined in relation to sectors and problems, this study also takes account of additional products, practices and purchase behaviours that have developed in recent years:

2.2.1 Payments

One of the most significant changes to purchase behaviour has been the expansion of credit options, particularly in relation to Buy Now Pay Later (BNPL) offerings. While forms of BNPL were previously available (e.g. hire purchase) they tended to be used primarily for larger purchases. In recent years however, the method has been made available for smaller purchases. In 2023, the Central Bank found that 15% of people in Ireland had ever used BNPL.¹⁰ In terms of

^{xx} The European Commission study focused on 6 problem areas selected following a calculation on the anticipated number of problems in each market, based on their engagement. This is not a recommended area as it removes the possibility of highlighting sectors which experience issues disproportionately to their size.

^{xxi} Approach also taken in UK DBEI 2002 study. CCPC’s previous approach asked respondents about their “main” problem.

future development, an article in 2021 noted that “a report from research group Research and Markets published in mid-July found that the Irish BNPL market is expected to grow by about 50 per cent every year to reach about \$1.2 billion (€1 billion) by 2028”.¹¹ As such, BNPL was included as an additional option in the payments section of the questionnaire.

Of specific sectoral interest, is the area of personal contract plans (PCPs) in the purchase of cars. The CCPC published a market study on PCPs¹² in 2018, noting that “in recent years PCPs have attracted considerable attention from consumers who have contacted the CCPC, from public representatives and in the media”. For that reason, PCPs were also included as a payment option distinct from a car loan.

2.2.2 Financial Products

Aside from the developments in the credit market listed above, new financial products have also come to the market in the form of crypto-assets (i.e. cryptocurrencies and non-fungible tokens (NFTs)). The CCPC Helpline has received a small number of complaints on the area in the past few years, but the amounts involved are often substantial (€20,000+). Cryptocurrencies or virtual currencies (VCs) are currently not regulated under Irish law and the potential for detriment is high, not least from the volatility experienced in their value. While they can be considered financial products, due to the risks involved Crypto-assets were included under the “gambling” section in this analysis.^{xxii}

2.3 Detriment Calculations

Several cost components are considered in our estimation of net monetised detriment. Net monetised detriment essentially quantifies all the relevant underlying financial costs associated with each instance of detriment and then offsets these costs against the degree of usability from the initial price paid for the good or service and any reimbursement received. We formalised this process with the following cost equation:

$$(V(U)) + (A) + (R) - (C) = \text{Net Monetised Detriment}$$

Where V is equal to the initial price paid for the good or service. U is the usability of the product which is used to offset the initial price paid. A relates to any additional or unforeseen costs

^{xxii} Unbacked crypto-currency was also referred to as gambling by representatives of the ECB in June 2023. See: (https://www.ecb.europa.eu/press/key/date/2023/html/ecb.sp230623_1~80751450e6.en.html)

associated with the purchase while R refers to the costs associated with seeking resolution. Reimbursement, or compensation received, is captured by notation C , and is subtracted from the other cost elements in the formula.

Using the cost equation outlined above, it is possible to estimate the net monetised detriment incurred at the individual level. Costs are also scaled to the working age population level to estimate the aggregate costs associated with consumer detriment within the Irish economy. Further details on the methodical approach applied in this report is provided in Section 5.

2.4 Research Questions

The results of the survey can be used for extensive analysis and will be a significant resource to the CCPC in planning and assessing strategy and enforcement activities in the coming years. For the purposes of this report a number of research questions were developed which will be examined in the following chapters:

1. What is the market engagement for the various products/services examined?
2. What is the incidence of detriment reported by consumers in Ireland?
3. What are the key sectors driving detriment in Ireland?
4. What are the key problems related to detriment reported by consumers in Ireland?
5. What is the financial impact of detriment reported by consumers in Ireland?
6. What is the non-financial impact of detriment reported by consumers in Ireland?

Chapter 2 Summary

- This study applied a mixed method approach using data from both face-to-face (F2F) and online surveys.
- Similar to other studies, this study used product and service categories in the questionnaire (19 categories covering 56 product/service areas), with follow up questions as a memory aid. Information on market engagement was also captured in order to understand detriment relative to the degree of consumers' experience within sectors.
- Respondents were required to select all areas in which they had suffered detriment and answer detailed questions in relation to their most serious issue. Problem categories included price or tariff; payment, invoice or billing; contract terms and conditions; and, cancelling an order or product terms.
- The study takes account of additional products and purchase behaviours that have developed in recent years. This includes new payment methods such as Buy Now Pay Later.
- A number of research questions were developed for the study covering areas such as the incidence of detriment in Ireland, the key sectors and problems relating to detriment in Ireland as well as the financial and non-financial impacts of detriment.

3. Consumer Detriment Overview

The chapter will consider the following questions:

- What is the level of market engagement for the various products/services examined?
- What is the incidence of detriment reported by consumers in Ireland?

In considering each of these questions, the demographic and behavioural traits of the survey respondents will be considered and highlighted as appropriate. Given the mixed methodology used in this study^{xxiii}, the potential impact of online versus F2F completion will also be examined.

3.1 Market engagement across products/services

In total, 56 individual markets were included in the questionnaire. The first question in the survey asked respondents to indicate products and services they “bought within the last 12 months, or bought previously and used in the last 12 months”. There are some conditions to this question that should be noted prior to understanding the full results:

- Time period: The reference to purchases made outside of the previous 12 months but used within the last year was a necessary inclusion due to the period of statutory rights available to consumers in Ireland.^{xxiv} The data therefore may not be a true reflection of purchases in the preceding year. However, as will be seen from the results, it does seem likely that many respondents interpreted the question as referring to purchases in the previous 12 months. For example, a ComReg study¹³ previously showed that 98% of people own a mobile phone, yet in this study only 57% of people said that they purchased or used a mobile phone in the previous year. This suggests that respondents were focusing more on the “purchase” wording in the question than the “use”. It is therefore a strong proxy (i.e. substitute) variable for market engagement figures in Ireland.^{xxv}
- Location: Respondents were instructed to limit their responses to purchases made in Ireland. This was intended to include items bought outside the country but while the consumer was present in Ireland.

^{xxiii} Results refer to combined F2F and online data unless otherwise stated.

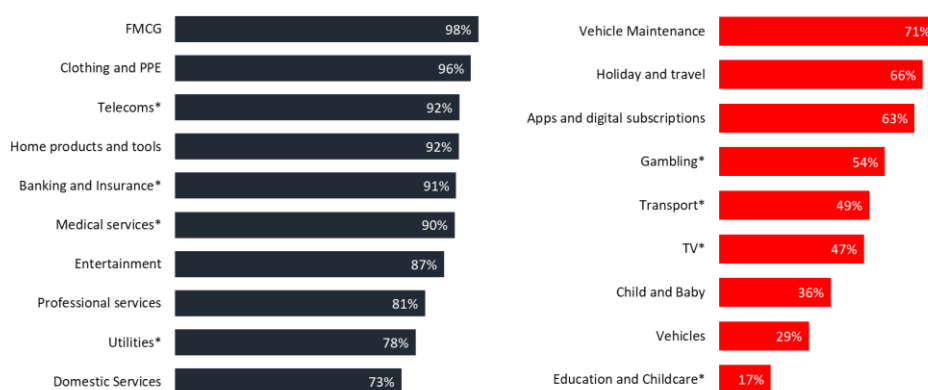
^{xxiv} Statutory rights under the CPA 2007 can apply for up to 6 years following purchase.

^{xxv} While the figures can be reflective of market penetration, we have chosen to refer to the data as “market engagement” throughout the report.

- **Cost:** Respondents were also instructed not to list goods or services which they obtained free of charge as it was not clear what the contractual arrangement and consumer rights might be in that situation.
- **Individualised purchase:** Respondents were instructed to only detail purchases made wholly by themselves.

With these limitations in mind, Figure 3 shows the 19 sectors which present an aggregate view of the 56 products and services^{xxvi} asked in which a purchase or use was made in the 12 months prior to the survey.

Figure 3: Market Engagement Categories^{xxvii}



Base: All Respondents (4,537)

*Denotes categories for which a sector or industry regulator is currently in place for at least one market.

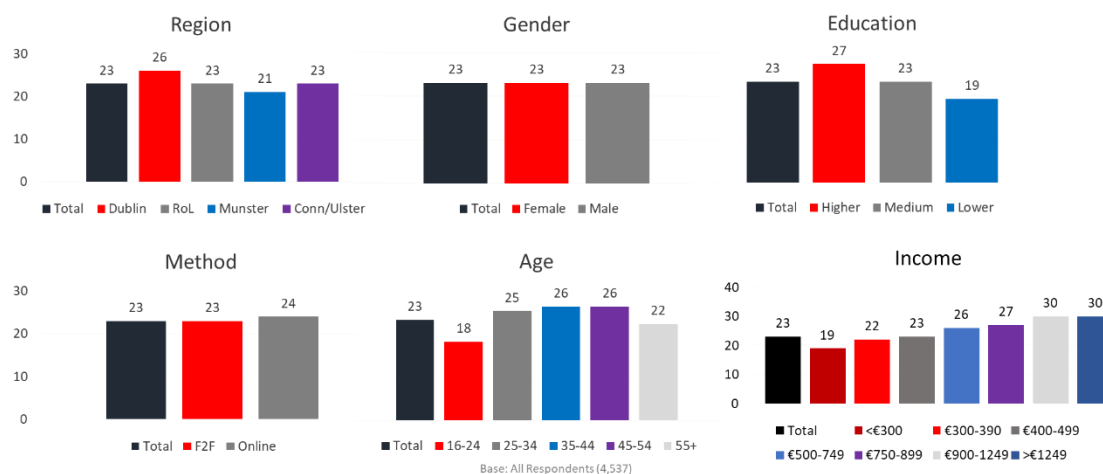
The highest levels of market engagement were evident in everyday product areas such as *Fast-Moving Consumer Goods (FMCG)* (98%), *Clothing & PPE* (96%), and *Home products & tools* (92%). Others reflect essential modern services: *Telecoms* (92%), *Banking & Insurance* (91%), and *Medical services* (90%). At the opposite end of the scale were *Education & Childcare* (17%); *Vehicles* (29%); and, *Child & Baby* products (36%).

Figure 4 shows the demographic differences across the breadth of markets consumers engaged with (based on the wider 56 markets). Breadth of markets refers to the number of individual markets the consumer engaged with in the last 12 months:

^{xxvi} Please see Chapter 2 for details on all 56 markets and the sector classifications.

^{xxvii} Base sample is equal to 4,537

Figure 4: Number of purchase/usage markets (by region, gender, age and survey method)



At an overall level, consumers engaged with a median^{xxviii} of 23 markets in the past year. There were no differences in terms of gender. At a regional level, there were some variations with those based in Dublin engaging with more markets on average than other regions. Breadth of markets in which consumers engaged also generally increased with age, with steady rises from 16-24 (18 markets) through to 45-54 (26 markets), before a decline to 22 markets in the 55+ year old age group. Engagement across markets increased with income^{xxix} with a median of 30 markets for those in the highest earning bracket versus 19 in the lowest earning bracket. Online respondents typically engaged with 24 markets while the median number of products purchased/used by those completing the F2F questionnaire was marginally lower at 23 (not shown in Figure 4).

Differences in consumption patterns identified here across groups of consumers provides useful context for our analysis. These differences can potentially influence the level of detriment experienced and this is examined further in section 3.2.2

3.2 Incidence of detriment reported by consumers in Ireland

There are a number of different approaches to the measurement of detriment available to the study. This section will explore:

- Proportion of people who reported experiencing any detriment in past 12 months.

^{xxviii} Median values are used throughout this report as they provide a more representative picture than the mean due to the presence of extreme values in certain variables that can potentially distort results.

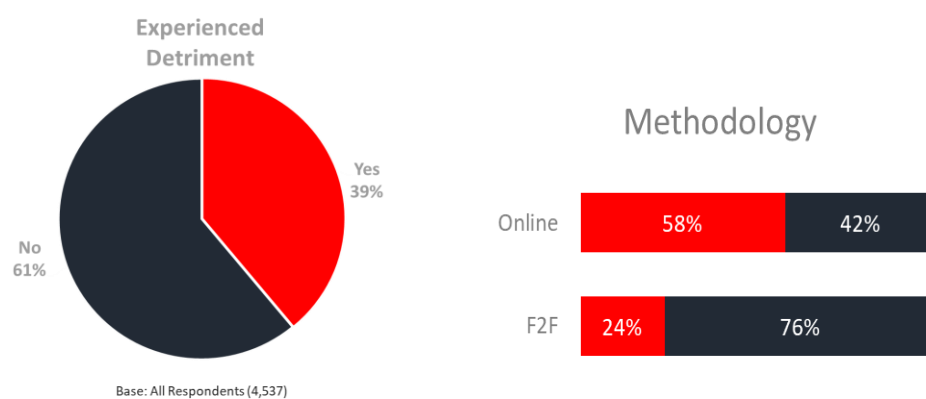
^{xxix} All incomes shown are based on weekly earnings.

- Proportion of people who reported experiencing any detriment in past 12 months, by individual characteristic (i.e. gender, age, region, education, income)

3.2.1 Proportion of people who reported experiencing any detriment in past 12 months

As can be seen in Figure 5, the majority of consumers (61%) reported that they did not experience any detriment in the past 12 months. Overall, 39% of consumers who responded to the survey suffered some form of detriment in at least one of the categories with which they engaged. On average^{xxx}, the number of instances of detriment reported per consumer was 2.

Figure 5: Incidence of detriment



There was a large difference between the online (58%) and F2F (24%) samples in terms of respondents reporting detriment. While this difference is quite stark, comparable trends have been reported in similar UK¹⁴ and European Commission¹⁵ studies. The European Commission report noted:

“In general, the incidence rates are much higher in the online survey than in the face-to-face survey. The scale of difference is broadly consistent across the six markets: for each market, the incidence rate is around three times higher in the online survey than in the face-to-face survey.”

The difference between online and F2F reporting in the context of this study will be explored in greater detail in section 3.2.2 below.

3.2.2 Proportion of people who reported experiencing any detriment in past 12 months, by individual characteristic (i.e. gender, age, region, education, income)

^{xxx} Based on median value

Identifying specific groups within the population that are most likely to report experiencing detriment is an important first step in understanding which consumers are most vulnerable to experiencing detriment in the Irish economy. Given the wide-ranging nature of consumer detriment examined in this study, this report does not strictly define who vulnerable consumers are in Ireland *per se*. Instead, demographic and socio-economic characteristics are considered important elements that may determine if consumers experience detriment.

There are two approaches that can be used when examining detriment across different cohorts: (i) descriptive statistics, and (ii) econometric analysis (i.e. regression analysis). Descriptive statistics involve methods for summarising and describing the main features of a dataset (e.g. mean, median, range), and are useful in providing a quick overview of a dataset and understanding its basic properties. Descriptive statistics however do not involve making inferences or predictions beyond the data at hand and as such can present a misleading picture when considered in isolation.

Regression analysis, on the other hand, is a statistical technique used to study the relationship between one dependent variable and one or more independent variables and as such can be particularly valuable when trying to understand the impact of one variable on another while considering and factoring out the influence of other relevant variables.

The information in model 1 (see Table 3) shows the differences at the individual level across the population without any adjustments. However, these differences could be due to variations in how the sample is made up. Consider demographic differences across regions as an example. Findings from model 1 show that the incidence of detriment is significantly higher in Dublin, however it does not account for possible variation in the composition of the Dublin population relative to other regions (i.e., differences in age, gender, income, etc.) that may also be associated with higher/lower rates of detriment. Comparisons of headline detriment rates across regions are therefore likely to be complicated by variations in individual characteristics across those regions.

Using multivariate analysis^{xxxii}, this section seeks to disentangle these effects and model the incidence of detriment across selected subgroups of the population after controlling for any

^{xxxii} Unlike univariate analysis, which focuses on a single variable, multivariate analysis considers interactions and relationships among several variables at the same time.

such variations (model 2).^{xxxii} Differences in consumption patterns based on variety of purchases in the prior 12 months are also considered (model 3). The rationale for adding variety of purchases as a control variable is that certain groups of consumers may engage with fewer markets on average, which could in turn affect their likelihood of experiencing detriment.^{xxxiii} To test this, the breadth of markets that consumers engaged with is added as an additional control in Model 3, which is used as a proxy for the variety of products purchased in the past 12 months. Up to a maximum of 56 products could be purchased, with the median number of purchases made by consumers totalling 23 (as noted in section 3.1).

Table 3: Predicted incidence of detriment % (by individual characteristic)^{xxxiv}

	Model (1) Descriptive Statistics	Model (2) Control for individual characteristics	Model (3) Control for individual characteristics and breadth of markets	N
Gender				
Male (<i>ref</i>)	40	40	41	2114
Female	37	37	36	2402
Age				
16-24 (<i>ref</i>)	48	49	53	536
25-34	(48)	(44)	45	721
35-44	(47)	(45)	44	940
45-54	38	37	36	824
55+	26	28	27	1495
Region				
Dublin (<i>ref</i>)	47	45	44	1238
ROL	34	35	35	1321
Munster	35	35	37	1184
Conn/Ulster	36	36	35	773
Education				
Low (<i>ref</i>)	29	32	35	579
Medium	39	38	(38)	1781
High	45	43	41	2156
Income				
< €300 (<i>ref</i>)	35	40	43	886
€300 - 399	42	(45)	(47)	461
€400 - 499	44	(44)	(44)	474
€500-749	45	(44)	(42)	681
€750 - 899	43	(38)	(36)	399

^{xxxii} Specifically, logistic regression models are used to predict the incidence of detriment across different socio-economic and demographic groups of consumers after controlling for differences in individual level characteristics.

^{xxxiii} See Appendix F for more detail

^{xxxiv} Results are presented as predicted probabilities using the margins postestimation command in STATA based on output from a suite of logistic regression models. See Appendix [x] for a full breakdown of model estimates.

€900 - 1249	45	(39)	(36)	325
€1249	48	(39)	(35)	259
Refused	28	26	26	645
Don't know	28	29	31	386
Observations	4516	4516	4516	4516

Note: Analysis is based on CCPC calculations. *Differences in parentheses are not statistically significant from the base (reference) category.*

Summary of findings: Descriptive Statistics (M1) vs Regression Analysis (M2 and M3)

- Gender:** As can be seen in the descriptive statistics (represented in model 1), males reported a higher level of detriment (40%) relative to females (37%). The predicted probability of experiencing detriment is broadly unchanged between model 1 and 2, despite comparing otherwise identical consumers (in terms of age, region, education, and income). Controlling for breadth of markets, a small increase (2 percentage points) in the predicted difference in detriment between genders is observed with males still having a higher probability of experiencing detriment.
- Age:** As can be seen in the descriptive statistics (represented in model 1), the gap between those aged 16-24 and those aged 55+ was significant at 22 percentage points, indicating that younger consumers were almost twice as likely to report experiencing detriment when compared to older consumers. Few changes are observed across age when other individual level characteristics are considered. Controlling also for breadth of markets (M3) increases the predicted gap in detriment across the age distribution, with younger consumers much more likely to report experiencing detriment than older consumers (26 percentage point gap). This indicates that age plays an important role in terms of identifying consumers most likely to report experiencing detriment.
- Region:** As can be seen in the descriptive statistics (represented in model 1), consumers in Dublin (47%) were almost one third more likely to report detriment than those in other regions (34-36%). Few changes are observed across region when other individual level characteristics are considered. Controlling for breadth of markets, a modest reduction in the predicted difference in detriment rates across regions is observed, however, consumers living in Dublin still had a higher probability of reporting having suffered detriment than all other regions, all else equal.

-
- **Education:** As can be seen in the descriptive statistics (represented in model 1), detriment increased with education level with those in the Higher^{xxxv} (45%) bracket 50% more likely to report detriment than those with a lower level education (29%). The predicted gap in detriment rates across education levels remains in model 2, albeit its magnitude reduces when controls are introduced. The gap in detriment rates across education levels reduces notably once controls for breadth of markets were introduced, with the difference between consumers with low and medium levels no longer significantly different from zero. Moreover, while the difference between consumers with high versus low levels of education remains statistically significant, the magnitude of the difference reduced by 10 percentage points between models 1 and 3. This implies that some of the differences in consumer detriment among education levels are influenced by individual characteristics (e.g. gender, age, region) and breadth of markets.
 - **Income:** As can be seen in the descriptive statistics (represented in model 1), consumers with the lowest levels of income reported experiencing lower levels of detriment on average when compared to consumers earning above €1,249 per week. The gap between the highest and lowest paid stood at 13 percentage points, which is significant in the context of an overall detriment of 39%. It is notable that the relationship between income and detriment disappears once controls are introduced in model 2.^{xxxvi} Indeed, the observed 13 percentage point gap in the rate of detriment reported by consumers earning less than €300 per week compared with those earning over €1,249 reduces to zero, whilst the relationship across most other income brackets is no longer statistically significant once controls for individual level characteristics are applied. It is likely therefore that much of the variation in reported detriment observed across income groups is reflective of differences in education levels, age profiles and regional effects. Detriment rates across the income distribution remains statistically insignificant from zero in model 3, which implies that income levels are not associated with consumer detriment, all else equal.

^{xxxv} Education categories were consolidated into Higher (NFQ level 6 or equivalent and above), Medium (NFQ level 5 or equivalent) and lower (NFQ level 3 or equivalent and below)

^{xxxvi} Coefficients in parentheses are not statistically significant.

Some of the above findings relating to gender, age and education are echoed in the international research, with varying reasons proposed for why some of the gaps exist. For example, with regard to age, the UK DEBI 2022 study noted that *“the relatively lower likelihood of having experienced detriment for consumers in later life is reflected in the analysis of detriment by economic activity”*. While this research also shows that older consumers are less likely to report experiencing detriment relative to younger consumer, the economic activity argument is not supported in this analysis. Figures relating to market engagement (shown in section 3.1) indicate that younger age groups engaged across a lower number of sectors versus older consumers. Potential hypotheses for why differences in ages exist may therefore focus on attitudes and behaviours. Older age groups may potentially be savvier in terms of their purchases based on previous experiences, meaning they limit their exposure to detriment. As with all studies of this type, there may also be a subjective reporting dynamic, with older age groups possibly less likely to report detriment.

With regard to income, the UK DBEI 2022 study found that higher income households report higher levels of detriment and similar findings hold at an international level. While this research noted a similar pattern in the descriptive statistics, further analysis controlling for variance in individual characteristics along with variety of products purchased, showed that income is not associated with detriment. It is worthwhile noting however that income measures alone do not provide a complete picture regarding an individual’s financial standing. Some international studies suggest that subjective financial wellbeing may be a better predictor of detriment outcomes. Where this has been examined in the UK, consumers who report being financially comfortable generally report experiencing less detriment.

3.2.3 Survey mode and consumer detriment

As noted in section 3.1, the incidence of consumer detriment varies significantly depending on the method of response. For example, while the average rate of consumer detriment was 39% in Ireland overall, the rate of detriment reported by respondents who completed the survey online was 58% compared to 24% amongst the F2F respondents. In this context, is important to test for possible compositional effects that can explain some, or all, of the observed difference in survey method. Considering the results outlined in table 3 above, there is a strong independent association between age and the probability of suffering consumer detriment, with older consumers much less likely to report issues and vice versa for younger consumers. It is important therefore to ensure that the difference in the observed detriment rate across

method type is not simply a result of the sample composition, whereby older respondents may have completed the F2F interview while younger respondents may have been overrepresented amongst the online survey respondents.

Table 4: Regression analysis: survey method and the incidence of detriment

	Model (1)	Model (2)	Model (3)
Survey Method			
Face to Face (F2F)	24	24	24
Online (<i>ref</i>)	58	57	57
Controls			
Individual characteristics	No	Yes	Yes
No. products purchased	No	No	Yes
Observations	4516	4516	4516

Note: Analysis is based on CCPC calculations. Differences in parentheses are not statistically significant from the base (reference) category.

To test this, table 4 presents the results from a suite of logistic regression models with the results reported as predicted probabilities. Model 1 is reflective of the descriptive statistics outlined above where the predicted probability of experiencing detriment amongst the online population totalled 58% while just 24% of F2F respondents reported detriment. Controlling for individual levels characteristics has little effect on the coefficients reported in model 2. This suggests that the difference in reported detriment across survey method is not linked to compositional effects associated with certain groups of respondents filling out the survey. Furthermore, model 3 indicates that controlling purchasing patterns does not explain why online respondents have a higher reported incidence of detriment when compared to otherwise identical F2F respondents. One possible explanation for these findings is that respondents felt more comfortable disclosing issues experienced anonymously online than to an in-person interviewer. Additionally, it is possible that recall of issue was enhanced amongst online respondents, who had time to reflect longer on possible issues that occurred in the previous 12 months. A more detailed discussion of online versus F2F can be found in Appendix B.

Chapter 3 Summary

- In measuring detriment, this chapter explored (i) the proportion of people who reported experiencing any detriment in past 12 months and (ii) the proportion of people who reported experiencing any detriment in past 12 months, by individual characteristic (i.e. gender, age, region, education, income)
- 39% of consumers who responded to the survey had suffered some form of detriment in the categories with which they engaged in the past 12 months. The median number of instances of detriment was 2.
- An analysis of consumer characteristics such as income, region and education through the use of regression analysis provided valuable insights on the likelihood of particular groups in the population experiencing detriment. For example, males, younger consumers, those with higher educational attainment and those based in the Dublin regions are more likely to report experiencing detriment.
- This study found no association between income levels and consumer detriment.
- The result presented here do not support the argument made in other international studies that difference in age is linked to economic activity. Younger Irish consumers were twice as likely to report experiencing detriment even after controlling for breadth of markets.
- There was a large difference between the online and F2F samples in terms of respondents reporting detriment. Comparable trends have been reported in similar international studies. Controlling for individual level characteristics and purchasing patterns does not explain why online respondents have a higher reported incidence of detriment when compared to otherwise identical F2F respondents.

4. Understanding Detriment Across Sectors

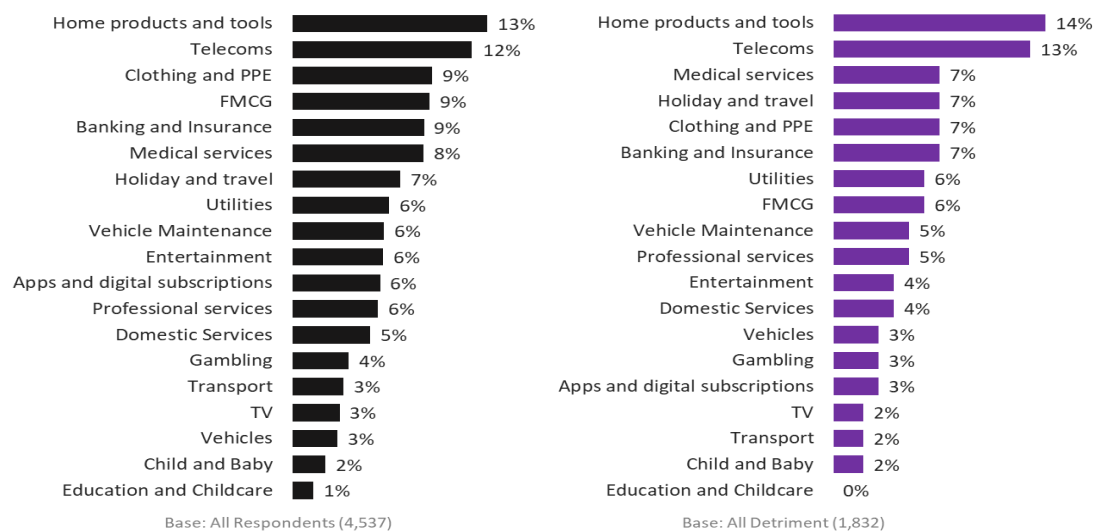
This chapter will consider the following research questions:

- What are the key sectors driving detriment reported by consumers in Ireland?
- What are the key problems related to detriment reported by consumers in Ireland?

In considering the key sectors driving detriment, incidence of detriment, in addition to ‘most serious issue’ and sectoral detriment, will be examined relative to market engagement. The problems reported by consumers will be examined across sectors, with consideration also given to what degree consumers contact sellers^{xxxvii} when attempting to resolve a problem.

4.1 Contribution by sectors to incidence of detriment and most serious issue

Figure 6: Incidence of Detriment^{xxxviii} and Most Serious Issue



As can be seen in figure 6, *Home products & tools* and *Telecoms* were the most problematic areas in terms of both incidence of detriment and ‘most serious issue’ reported. Across the 56 product areas, the median number of sectors in which detriment was reported was 2, with very little difference across individual groupings, with the exception of online vs F2F respondents.

^{xxxvii} Sellers is used instead of trader as Consumer to Consumer is included as a purchase channel

^{xxxviii} Base sample equals 4,537

Amongst those completing online who reported detriment, the median number of categories was 3, versus 1 in the equivalent F2F group.

4.2 Analysis of detriment within sectors, relative to market engagement

While an overview of detriment provides some useful insights, nuances within the data can be lost. A key element of this is investigating lower market engagement categories which may have high detriment levels within the market but do not represent a significant portion of the overall detriment share due to the lower sample who purchase in the market or category. This can be examined in the context of: (i) most serious issue; (ii) sectoral detriment.

Figure 7: Market engagement and most serious issue

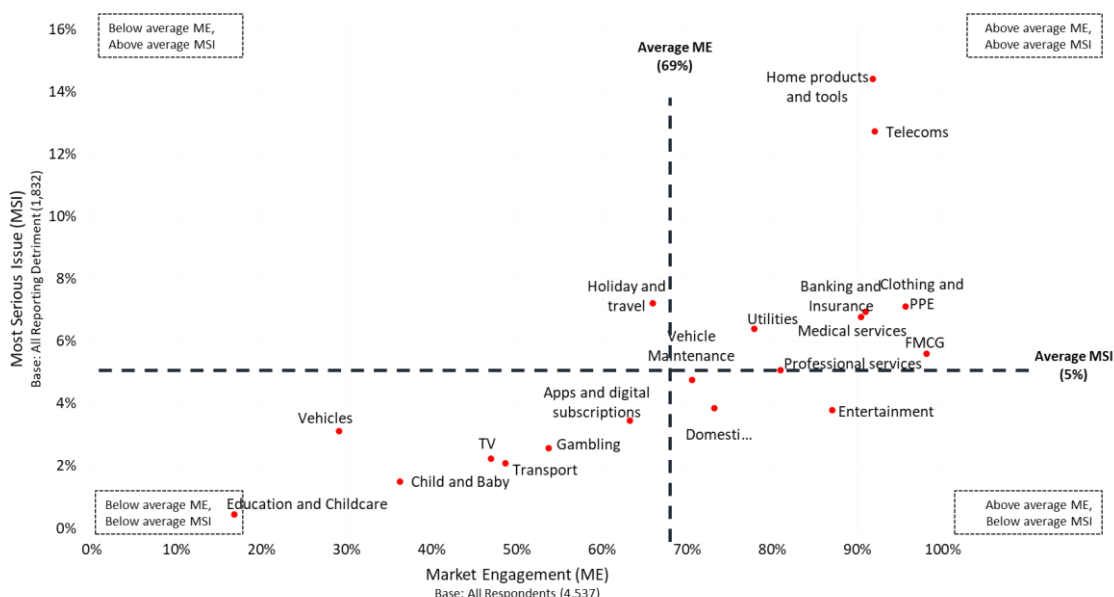
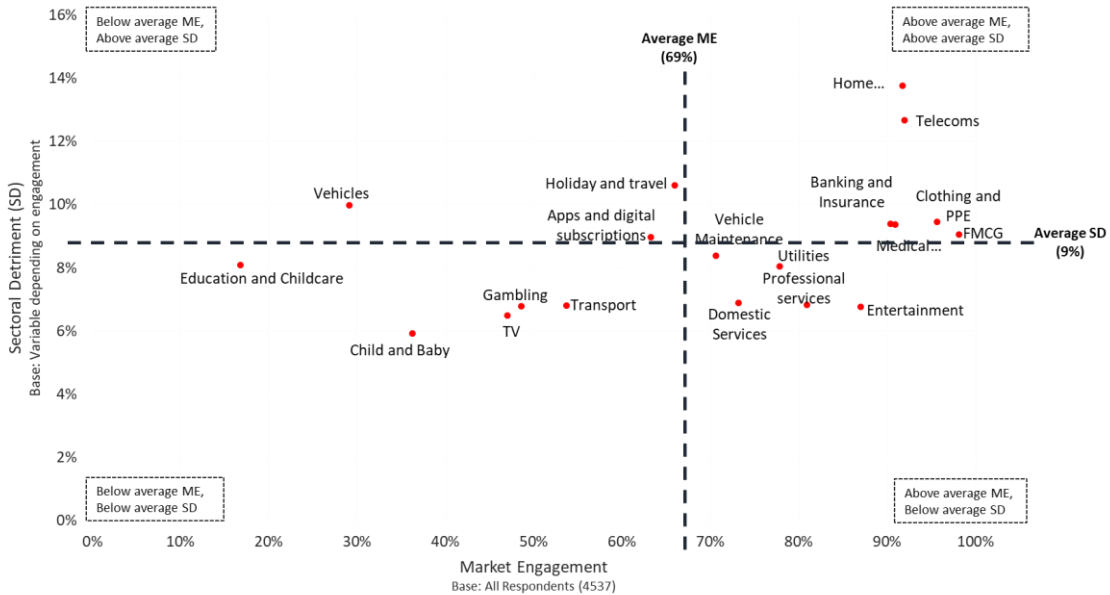


Figure 7 displays four quadrants representing various degrees of most serious issue and market engagement relative to the average. While all quadrants have relevance for regulation and enforcement, the top right quadrant is theoretically the most impactful given the higher than average levels of engagement and detriment. *Home products & tools, Telecoms, Banking & Insurance, Medical Services, Clothing & PPE and FMCG* in particular stand out as areas of interest from this chart. *Holiday & travel* is also worth noting as it is an area of below average market engagement but above average incidence of detriment.

Another valuable method of analysing detriment is sectoral detriment shown in Figure 8. This measure calculates detriment in the context of those consumers who purchased within the category and experienced detriment (as such the base is variable).

Figure 8: Market engagement and sectoral detriment



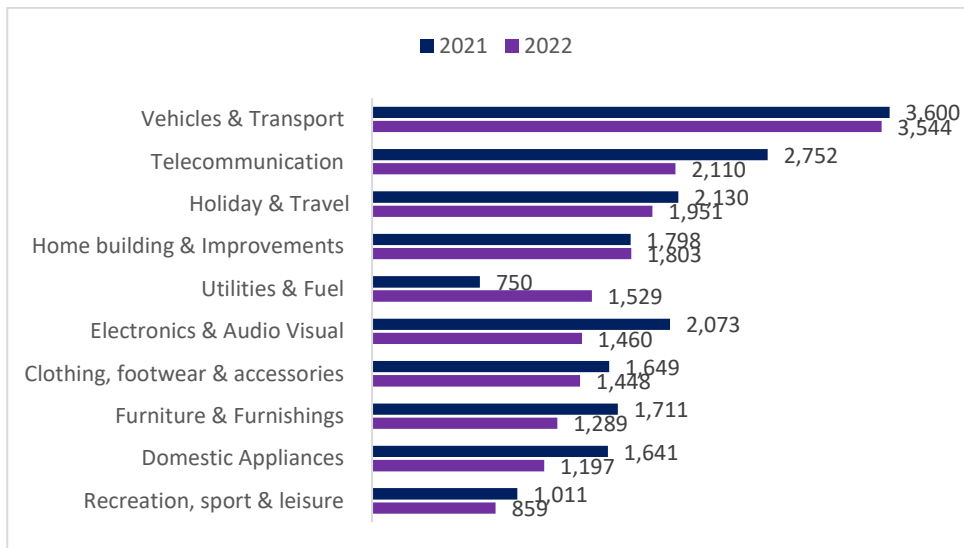
It is evident from Figure 8 that under this measure *Vehicles* is an area of below average market engagement but above average sectoral detriment.

Home products & tools along with *Telecoms* is consistently high across these measures which indicates its importance to consumers and impact when a consumer experiences a negative outcome.^{xxxix}

As seen in Figure 9, sectors highlighted above are also noted in the CCPC Consumer Contacts Report 2022.¹⁶

^{xxxix} There is likely to be a Covid-19 influence in this case with the CCPC Contacts report showing that telecoms fell 23% in terms of contacts share from 2021-2022. It remains to be seen whether this trend will continue into 2023.

Figure 9: Contacts to the CCPC helpline

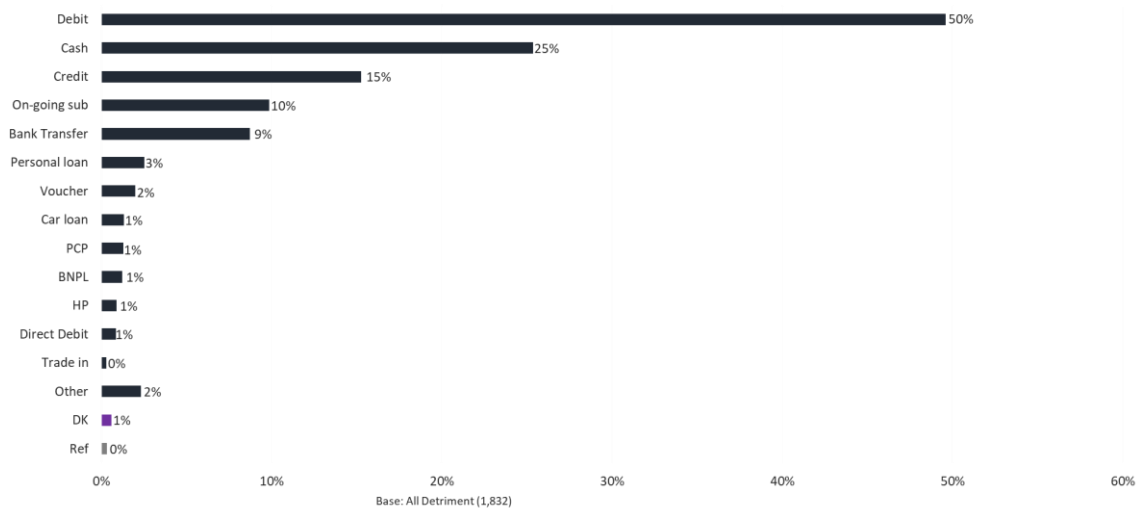


4.3 Analysis of most serious issue

When responding to the survey, consumers were asked a series of additional questions related to their most serious issue. Additional information relating to payment methods, problem and trader location is examined below.

4.3.1 Payment Method

Figure 10: Payment method of most serious issue



As can be seen in Figure 10, 50% of most serious issues were attributable to products or services made with a *debit card*, with *cash* accounting for a further quarter of issues.^{xi} These figures are not helpful as stand-alone findings and need to be placed in the context of how products are generally purchased. Unfortunately, exact figures for payment types at point of sale are difficult to obtain from industry to compare these figures against. However, an article from the Central Bank of Ireland (CBI) in 2021¹⁷ noted that ATM withdrawals as a percentage of consumption made up approximately 20% in 2019, compared to just under 60% for card payments^{xii}. Assuming these figures are a reliable benchmark of consumer spending, they would be broadly in line with the figures for most serious issue in this study – meaning that payment type is not necessarily a valid predictor of potential detriment.

Of interest in this category is also the *BNPL* total. At just 1%, it was slightly underrepresented versus the usage of this payment method in other studies the CCPC has conducted.^{xiii} The low sample size also did not allow for further exploration. *Vouchers* also accounted for a very small proportion of detriment related transactions. The CCPC has been active in ensuring consumers are aware of their rights in relation to vouchers and gift cards.¹⁸

4.3.2 Analysis of problems that contribute to the most serious issue

When answering about their most serious issue consumers reporting detriment were asked about the type of problem(s) they experienced. They were permitted to have more than one type of problem as this reflects the reality of consumers' experience. Consumers were initially presented with a list of broad categories of issues and then asked for more specific answers within those categories. While the list was intended to cover as broad a range of issues as possible, an "other" option was included which was used in some cases. For clarity, the data below refers to the broad categories of issues encountered.

^{xi} Consumers were allowed to include more than one payment method so answers will total to more than 100%

^{xii} We acknowledge one ATM withdrawal can pay for multiple transactions

^{xiii} Research conducted by the CCPC in 2021 showed that 4% of consumers intended to use BNPL as a payment option: <https://www.ccpc.ie/business/ccpc-research-shows-1-in-3-consumers-plan-to-borrow-to-fund-christmas-spending/>

Figure 11: Problems by market

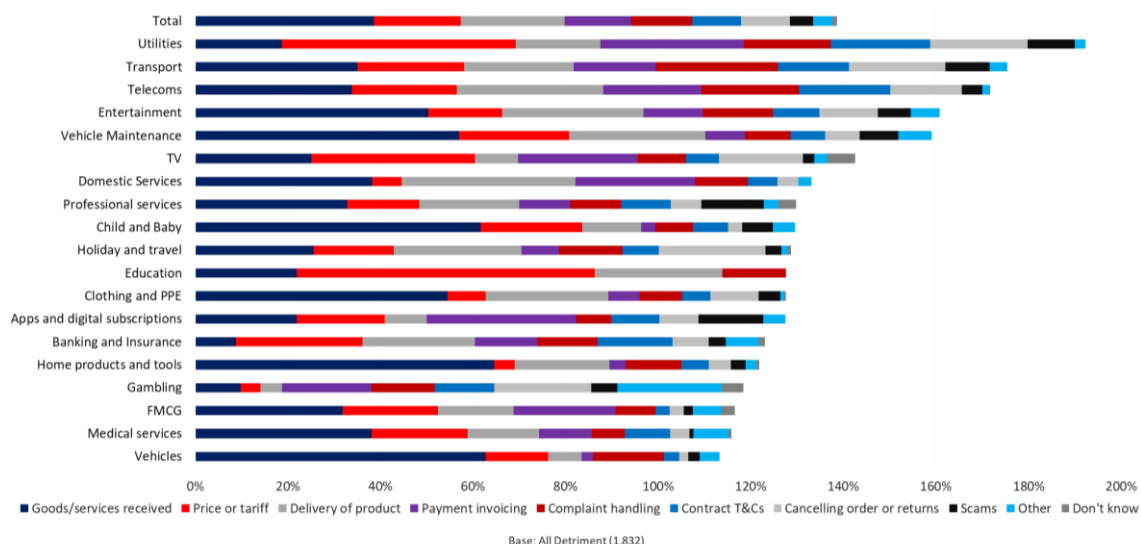


Figure 11 shows the proportion of problem categories across the sectors and at a total level. In total, more than a third (39%) of consumers who reported problems had issues with the good or service received – essentially meaning that it did not perform to expectations. Next with 22% was issues with the delivery of the product. Of those who selected this problem category, 47% had purchased the product/service online, compared to 33% in person. Problems related to price/tariff were next.^{xliii}

In terms of sectors, Price/tariff stood out as a key issue in the *Education & Childcare* (64% of consumers reporting an issue in the category), and *Utilities* (50%). Those reporting detriment in the *Utilities* category also had issues with payment/invoicing. This problem category was the highest individual issue with *Apps & digital subscriptions* (32%).

Delivery of goods/services saw its highest proportion in *Domestic services* (37%) and *Telecoms* (32%) and while it was high in *Entertainment* also (30%) issues with the goods/services itself was the primary problem in that category (50%). Issue with good/service was also high in *Home products & tools* (65%), *vehicles* (63%), *child & baby* (62%). *Vehicle maintenance* and *Clothing & PPE* also saw more than half of consumers (57% and 55% respectively) reporting issues with the goods/service. These results support many of the CCPC’s activities in terms of enforcement of consumer protection legislation where we have secured successful prosecutions in vehicle sales and maintenance. In addition, our product safety division has ordered and processed a high

^{xliii} This category potentially includes a number of inflation-led issues.

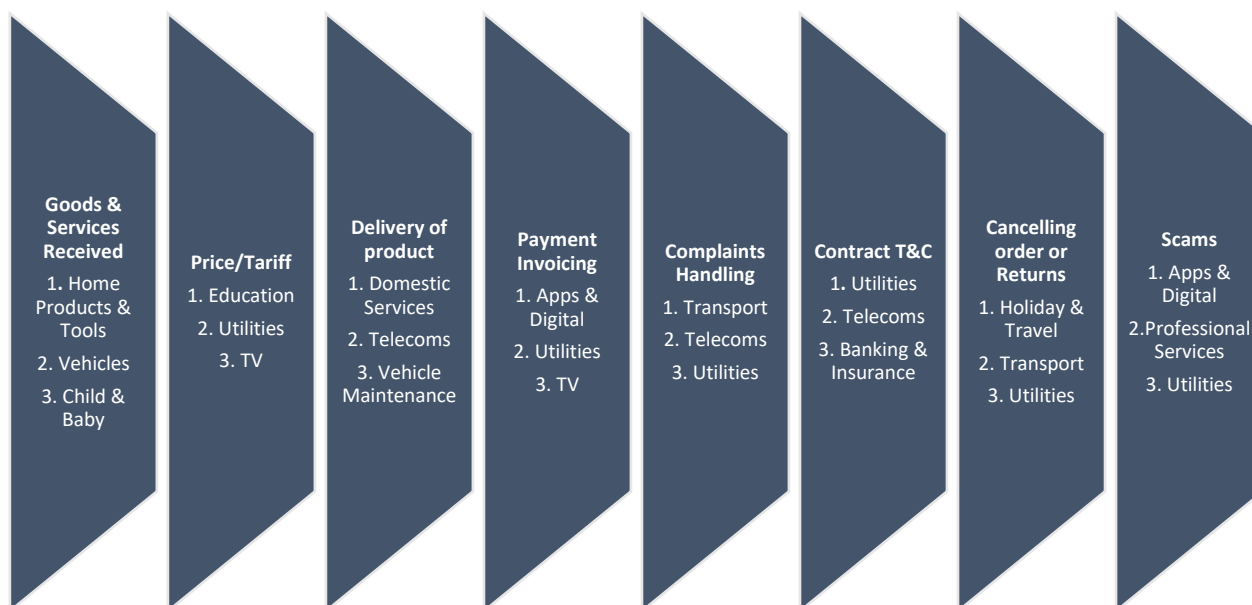
volume of recalls¹⁹ in the area of toys and baby accessories, and home products and tools. This included the unusual step of banning a whole product line in the case of baby-self-feeding pillows in December 2022.²⁰

While issues with contract T&Cs and cancelling a contract (both 11% of total problems) occurred in a smaller volume of cases they both had higher scores in specific sectors. *Utilities* (21%) and *Telecoms* (20%) had the highest proportion of contract T&C problems while *Holiday & travel* (23%), and *Gambling, Transport* and *Utilities* (all 21%) had issues with cancelling order or returns.

Issues with complaints handling were highest in *Transport* (26%) and *Telecoms* (21%) while scams saw its biggest share in *Apps and digital services* (14%) and *Professional services* (13%).

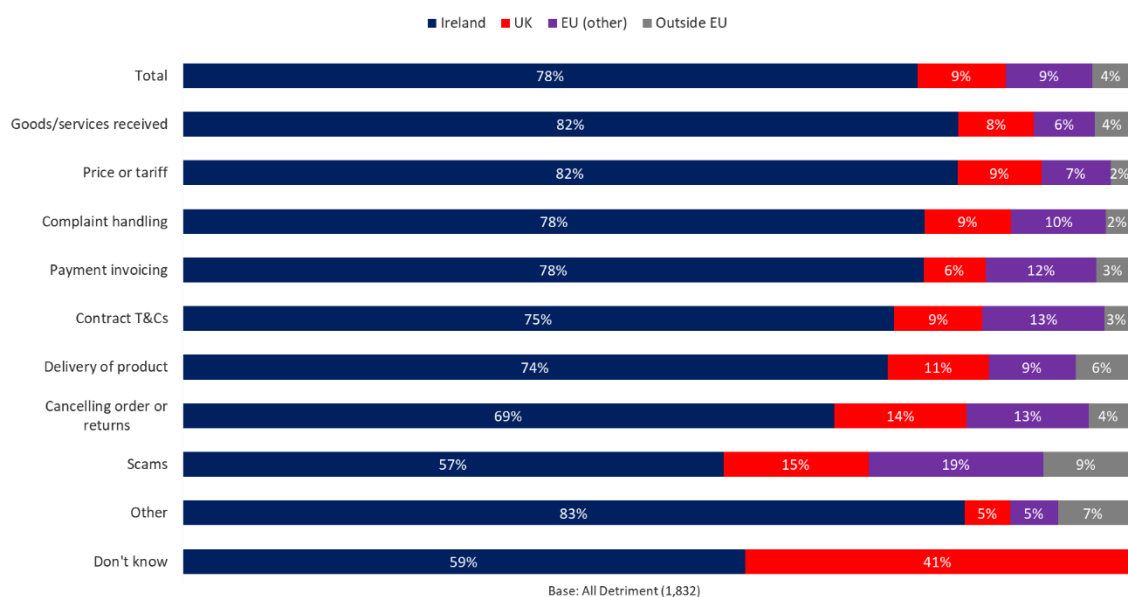
An overview of the top 3 sectors across all each problem can be seen in Figure 12 below.

Figure 12: Top 3 sectors across problem areas



4.3.3 Problems reported by trader location

Figure 13: Problems by trader location^{xliv}



When the trader location was considered, some differences in problems across geographical location was evident. Scams for example tend to be underrepresented in Ireland versus other issues, with the EU making up a higher proportion of this category in comparison to other problems.

Linked to the location of the trader, is how the consumer first heard about the product or service with which they experienced their most serious issue.

Almost two thirds (62%) of most serious issues were experienced through providers that consumers were already familiar with (49% had used that seller before, 13% knew the company previously). A further 12% of consumers reporting detriment said their most serious issue arose from a product or service recommended to them by a family or friend. While friends and family can be important real-world sources if they have experience of the product or service, this finding is a reminder that consumers should always carry out further research for themselves before making a purchase.^{xlv}

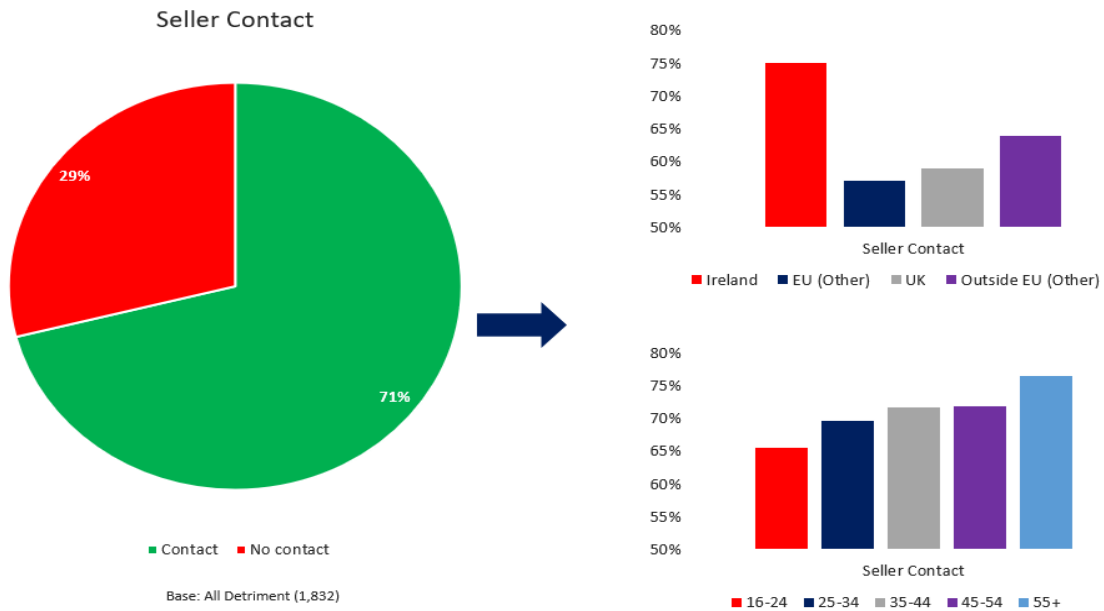
^{xliv} "Don't know" responses excluded.

^{xlv} Trust in friends and family recommendations was also highlighted as having a potential indirect impact on detriment in the CCPC's Influencer Marketing Report published in 2022.

4.3.4 Contacts

Respondents were also asked who (if anyone) did they contact in relation to their most serious issue. Of particular interest to this category is contact with the seller^{xlvi}, as this is always advised as first port of call to consumers experiencing detriment and in the majority of cases a trader is likely to be liable for detriment.^{xlvii}

Figure 14: Communication with seller

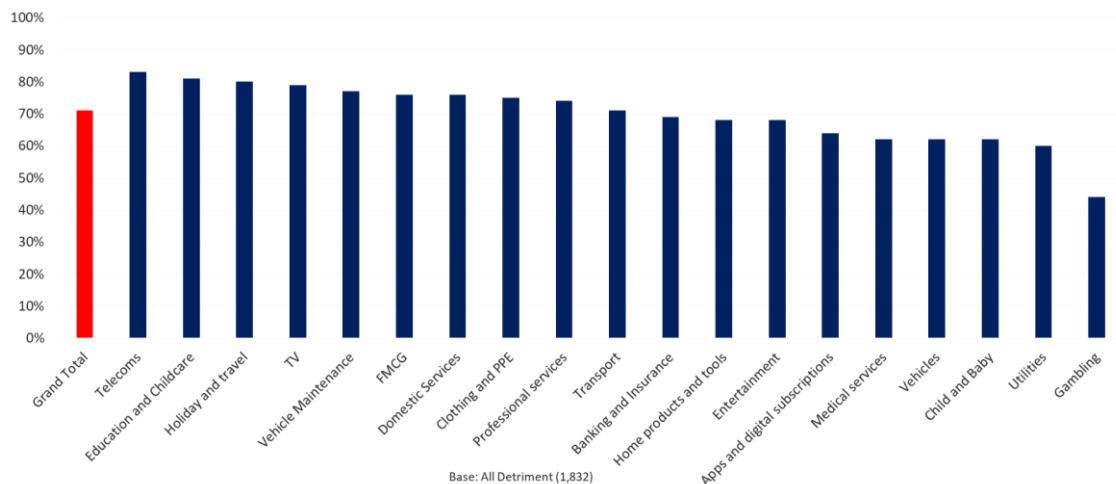


Of those who reported detriment in this study, 71% said that they contacted the trader who sold them the product/service. This was highest when the trader was located in Ireland (75%) and lowest for traders based in the rest of the EU (59%). Differences also exist in relation to age, with likelihood of the seller being contacted increasing steadily with age from 66% in the 16-24 age group to 76% in those aged 55+.

^{xlvi} Seller is used in this context as C2C was also included a purchase option.

^{xlvii} Exceptions to this may apply where a trader is not at fault and/ or may not be an undertaking under legislation. The only clear issue evident in this survey where this would not be the case is problems related to scams where a genuine reason exists not to contact the “seller”.

Figure 15: Proportion of those contacting seller (by category)



Across different categories, there is also variance in the proportions contacting the seller. The likelihood was highest in *Telecoms* (83%) and lowest in *Gambling* (44%). Given the prevalence of crypto-asset scams in the gambling category, this is not necessarily surprising.

Chapter 4 Summary

- This chapter considered the key sectors driving detriment in Ireland and the key problems relating to detriment reported by consumers in Ireland.
- The median number of sectors in which detriment was reported per consumer was 2.
- Several measures for detriment were examined: (i) incidence of detriment relative to market engagement; (ii) most serious issue relative to market engagement; and (iii) sector specific detriment relative to market engagement. *Telecoms* and *Home products and tools* were consistently high across these measures indicating the importance of these areas to consumers and the potential negative impact when issues occur.
- Problems experienced by consumers in relation to their most serious issue were examined. More than a third (39%) of consumers who reported problems had issues with the good or service received. This was followed by delivery of product (22%).
- In terms of actions taken by consumers following negative outcomes, 71% stated that they had contacted the seller who sold them the product or service.

5. Understanding the Impact of Detriment: Financial Costs

Respondents who selected more than one instance of detriment were asked to specify their “most serious problem” and were questioned further on this. Those with just one issue were auto-selected into answering on that problem only. The data outlined in this section therefore refers only to the financial costs associated with the most serious issue experienced by consumers.

To quantify the scale of the costs - at the individual and macro level – associated with experiencing consumer detriment in Ireland, several cost elements were considered. These included the initial price paid for a good or service, any additional costs incurred above what was expected, and the cost(s) of resolving an issue. Reimbursement was also considered and was used to offset the other costs components. Combining these elements formed the foundation for calculating the value of consumer detriment in Ireland. This section details each of the different cost elements. Before providing detail around each cost element however, it is useful to first contextualise the scale of these costs by examining the proportion of respondents that reported experiencing each of these elements that underpin the financial detriment calculation.

Figure 17: Share of respondents with additional costs

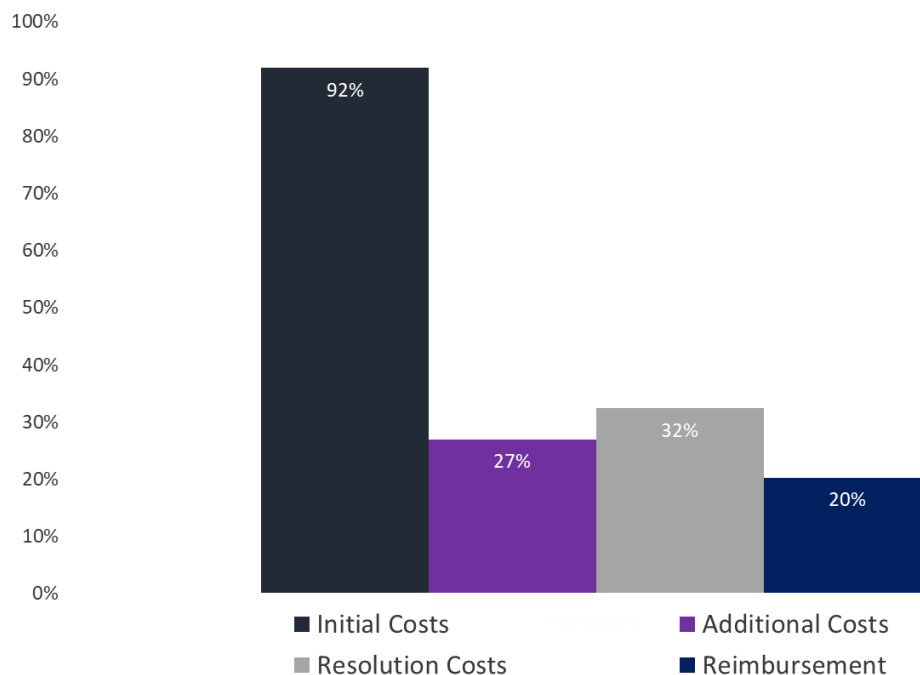


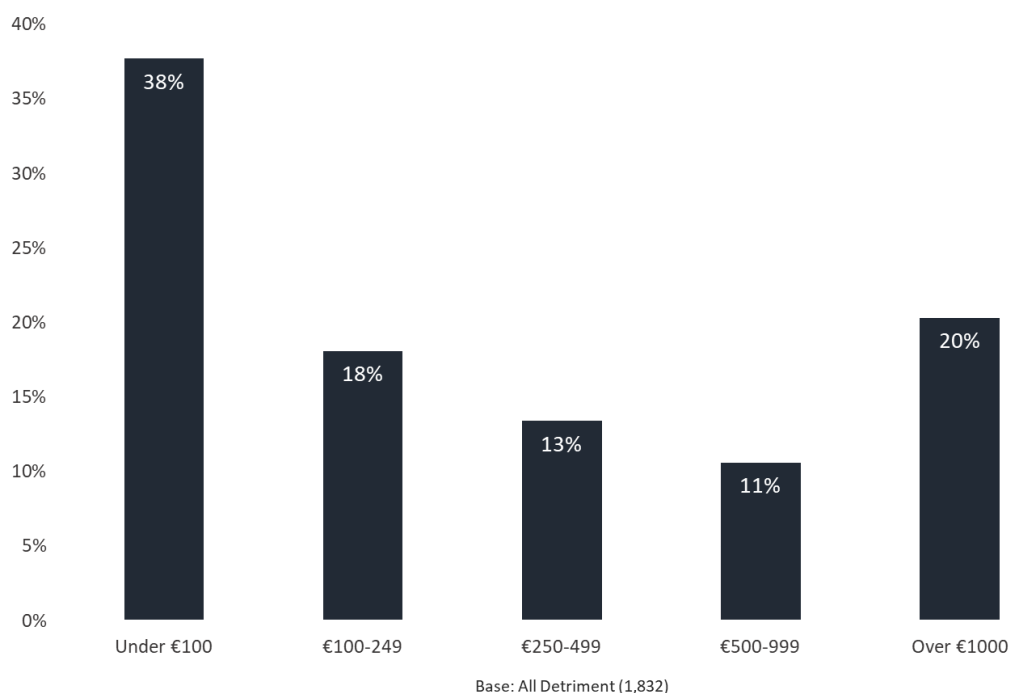
Figure 17 illustrates that 92% of those who reported experiencing consumer detriment also paid an initial cost associated with the reported problematic good/service. It is not surprising that some respondents did not have any initial costs as an issue may relate to a good/service where no upfront payment was required, or to a problem associated with a gift or present received.^{xlviii} Nonetheless, the majority of consumers reported paying some form of upfront costs for their purchase. The share of respondents that incurred additional and or resolution costs was considerably lower at 27% and 32% respectively. Taken together, the share of consumers that paid either additional or resolution costs totalled 50%, which is considerably higher than the share of consumers that received financial compensation (21%). While the compensation share is relatively low, it is possible that resolution was received through alternative channels not reflected in Figure 17. For example, replacement items or repair services may have been provided to consumers which is not directly captured within the reimbursement variable. The following sub sections provides further details on each of the above cost components.

5.1 Initial price of purchase

To understand the costs incurred by consumers associated with instances of detriment, it is useful to first examine the initial price paid for such goods/services. Figure 18 illustrates that nearly 40% of consumers paid less than €100 for their purchase, while a further 18% paid between €100-249. Just over 20% of consumers on average paid above €1,000 for the product reported as being their most serious issue. The median value of all initial costs associated with purchases where consumer detriment was reported stood at €120.

^{xlviii} As previously noted in Chapter 1, respondents were asked not to include gifts. From a review of the data it appears that this instruction was not adhered to by a small proportion of respondents.

Figure 18: Initial cost associated with most serious issue

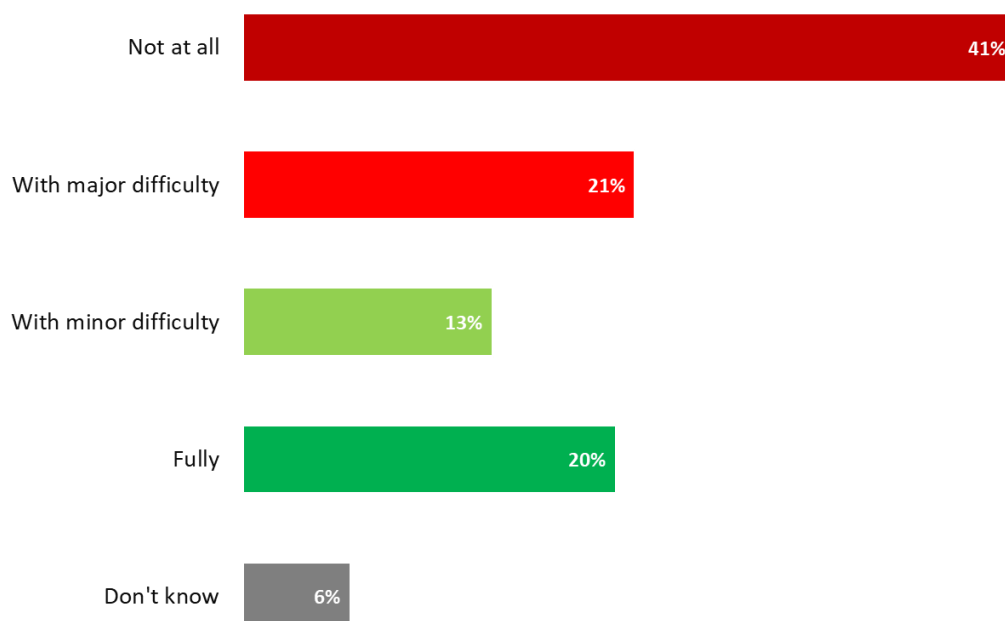


Notable variations in the initial costs were observed across market sectors. For example, 85% of consumers that reported entertainment products as their most serious issue in the past 12 months paid under €100 for their purchase, significantly above the 40% shown in Figure 18. In contrast, only 9% of consumers that reported an issue with vehicles in the past 12 months paid less than €100. Almost 80% of consumers that reported an issue with a vehicle purchase in the past 12 months paid an initial price of over €1,000. This is also reflected in the median values. For example, issues relating to vehicles typically had higher values (€4,500) on average and were significantly above the initial costs typically paid for entertainment goods/services (€30). This underscores the scale of the observed variation in upfront costs associated with purchasing different product categories and the potential knock-on implications this has for the costs arising from problematic purchases. When considering the initial price paid for a good or service, understanding the degree to which consumers could use the product while the issue persisted, as well as the duration the issue persisted, provide beneficial insights into the nature of costs incurred by consumers.

5.2 Usability of product and duration of issue

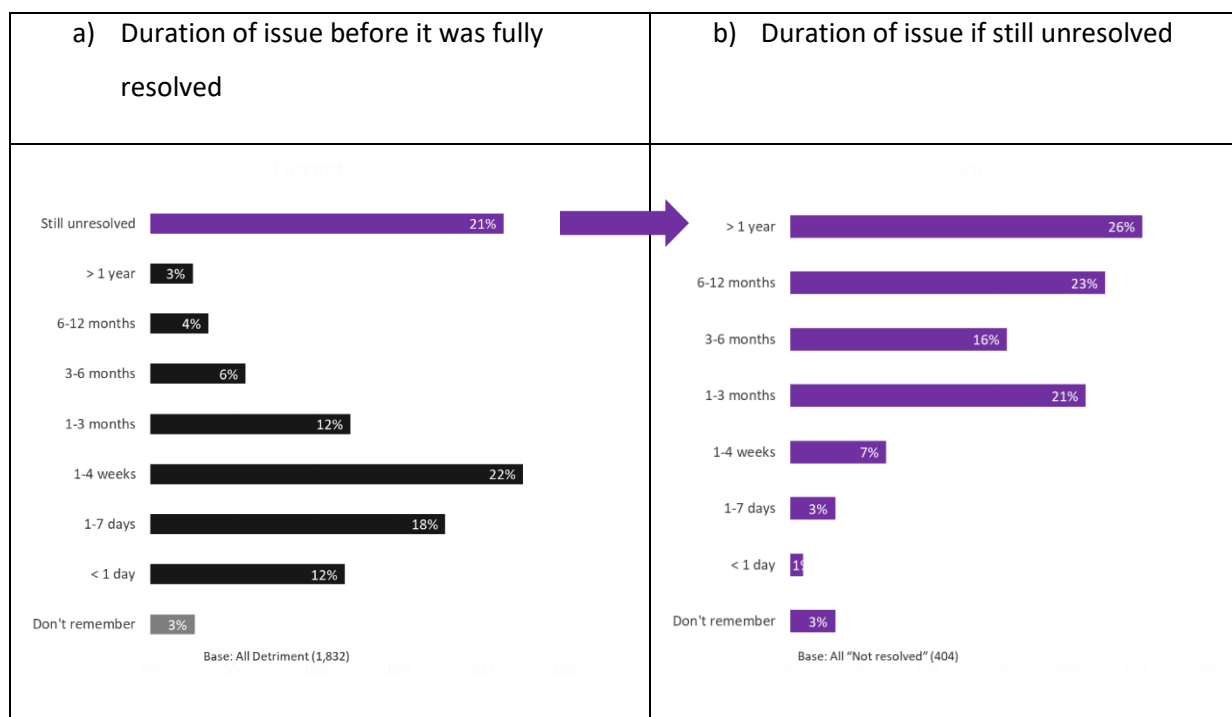
Consumers could typically “not at all” use the good or service that was linked to the most serious issue reported. Figure 19 shows that over 40% of respondents could not use the product at all with a further 21% only being able to use the product with major difficulty. Only one in five of respondents were able to fully use the product with fewer than 13% able to use their purchase with minor difficulty. These findings imply that the use value retained by products after purchase either reduced to zero or were significantly diminished in the majority of cases where detriment was reported.

Figure 19: Usability of good/service



Problems generally lasted between 1-4 weeks before being resolved while a significant share of consumers reported that their issue was still unresolved when asked. Figure 20 (panel a) shows that 23% of problems persisted for 1-4 weeks with a further 13% resolved between 1-3 months. In contrast, only 2% of problems lasted longer than 1 year before being resolved. A notable share of respondents noted their issues was still unresolved (22%) at the time of completing the survey. The duration of the ongoing issues is examined in panel b.

Figure 20: Duration of issue



Almost half of unresolved issues have been ongoing for at least 6 months. Of the 22% of respondents that were still awaiting resolution in panel a, over one quarter stated that their issue was going on for more than 1 year with a further 22% waiting for up to 6 months (panel b). Within this subsample (approx. 200 respondents) of consumers that have yet to have their longstanding issue(s) resolved, *Telecoms* made up the largest share (17%), followed by *Home products & tools* (11%), *Utilities* (11%) and *Medical services* (10%).

5.3 Other costs and reimbursement

Other costs are broken into two elements: additional costs and resolution costs. Additional costs refer to “additional charges or hidden fees” over and above what consumers expected to pay. This question quantifies the scale of detriment related to billing issues, mislabelled pricing or customs or other fees not correctly explained to consumers. Resolution costs refers to detriment incurred as a result of the problem or money spent trying to resolve the issue. Resolution costs are categorised under the following 5 sub categories.^{xlix}

- Repairs or replacement of item/service

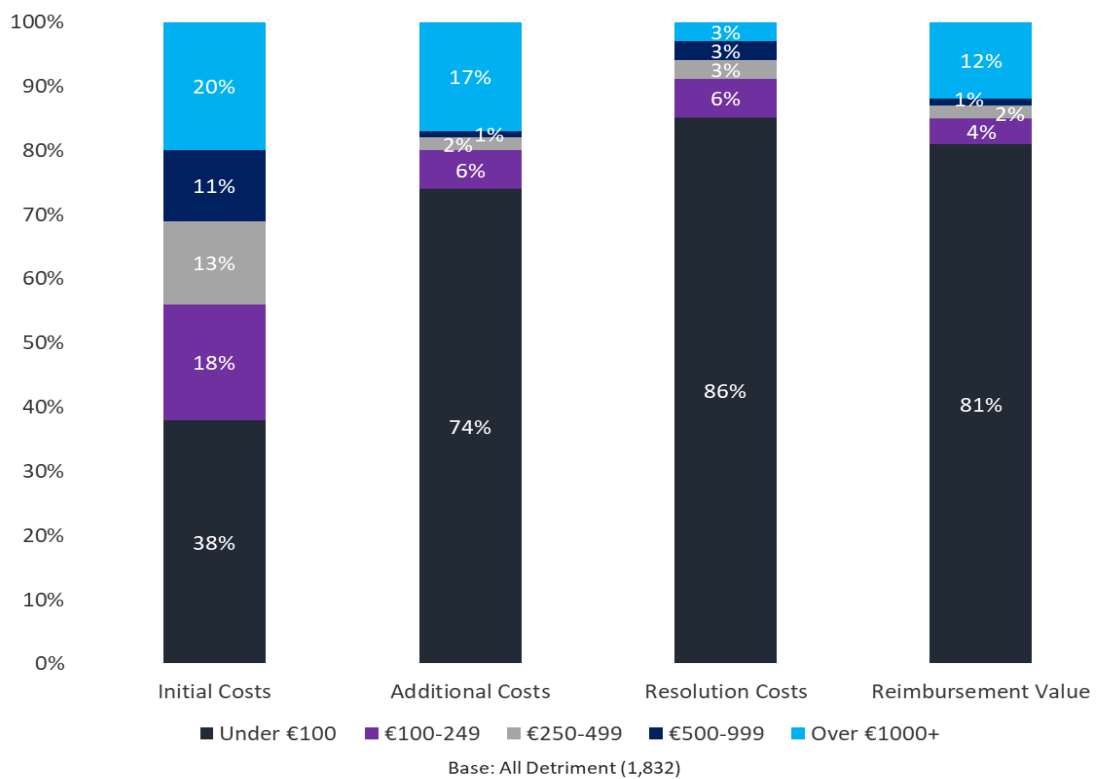
^{xlix} For analytical purposes, these 5 categories are aggregated and referred to throughout the report as resolution costs.

- Legal action taken (e.g. courts, solicitor costs)
- Structural damage (for example damage to home from a defective product)
- Other costs such as postage, telephone, etc
- Medical costs not covered by health insurance

Reimbursement meanwhile refers to compensation received by the consumer relating to their most serious issue.

As noted earlier, the proportion of consumers reporting additional and resolution costs along with reimbursement were considerably lower than the initial costs paid by consumers. To this end, it is unsurprising that the majority of consumers in these 3 cost categories incurred costs/reimbursement under €100 (Figure 21). This finding is largely a function of the sizeable share of consumers in these categories not experiencing such costs, and therefore recorded as zero. While this may reduce our ability to draw meaningful conclusions from figure 21, it provides useful context for how these components effect our calculation of net monetised detriment.

Figure 21: Auxiliary costs/reimbursement associated with most serious issue



5.4 Estimating net monetised detriment

The costs/reimbursement components outlined above provide the essential building blocks allowing us to calculate the value of net monetised detriment in Ireland. Net monetised detriment essentially captures all relevant costs associated with each instance of detriment and then offsets these costs against the degree of usability from the initial price paid for the good or service and any reimbursement received. We formalise this process with the following cost equation:

$$(V(U)) + (A) + (R) - (C) = \text{Net Monetised Detriment}$$

Where V is equal to the initial price paid for the good or service. U is the usability of the product which is used to offset the initial price paid. A relates to any additional or unforeseen costs associated with the purchase while R refers to the costs associated with seeking resolution. Reimbursement, or compensation received, is captured by notation C, and is subtracted from the other cost elements in the formula. Estimates are then scaled to the working age Irish population (3.9 million) to provide an overall cost figure associated with consumer detriment across the wider the economy. The following paragraphs provide additional detail on each component of the cost equation while examples are provided to demonstrate how the equation is applied in practice.

Use value of purchase: (V(U))

We first estimated the initial price paid by each consumer for the most serious issue reported. The use value is then estimated using the subjective response provided by consumers asking about the degree to which they could use the good/service (see Figure 19). This is in turn is used to offset the initial price paid by consumers that could use their product (to varying degrees) and to capture only the component of the upfront cost that is directly linked to consumer detriment. Specifically, respondents that noted they could “fully use” the good service were assigned a weighting (U) value of zero against their initial price, meaning that they were recorded as having not suffered financial detriment associated with the upfront cost of their purchase. In contrast, respondents who reported not being able to use the good or service at all were assigned a value of one, meaning that they are recorded as having suffered the full amount of detriment associated with the upfront cost of the purchase. Meanwhile, respondents that could partially use their purchase were assigned a value of 0.33 while those that could only use with major difficulty were assigned a value of 0.66 and these values were offset accordingly. Adjusting for use value helps to better reflect the *true value* of detriment and aims to more accurately capture the overall costs associated with detriment at the macro level. The use value

of the product therefore reduces the level of overall detriment reported in our calculations and prevents overestimating the value of net monetised detriment.ⁱ

In a small number of cases, the duration of issue is used to standardise the initial cost value (V) provided across different payment types. Given the wide-ranging nature of products and markets examined in this research, respondents could report the initial price paid for their good or service as a once-off payment or as an ongoing payment. Contextually, 90% of initial costs reported were made using an upfront payment and no further actions are made to these observations.ⁱⁱ The reported figures across these payment types are not directly comparable. For example, an issue with an internet provider that lasts up to a year is likely to underestimate the true initial cost paid by a consumer that reports only the monthly value paid. To overcome this, ongoing payments were adjusted to take account of the duration of the issue. The number of payments that an individual would be expected to pay over the duration of the issue is taken as the initial value for these consumers. For example, extending the above example in relation to the internet, if the initial price for the ongoing payment is €30 (per month) and the issue persisted for 1 year, the initial value (V) in this case would be €360 (€30*12).

Additional / Resolution / Reimbursement Costs: (A) + (R) – (C)

Additional costs were added to the cost equation along with any recorded resolutions costs. Additional costs refer to any unexpected costs associated with the purchase (such as hidden fees or custom charges etc.) while resolutions costs refer to costs associated with resolving the issue. The latter can take the form of legal, medical, structural, and other resolutions costs. Finally, reimbursement values are used to offset costs where provided.

To understand how these components are calculated in practice, consider the following two fictitious examples for Jack and Jane.

- Jack reports an issue with the purchase of a lawnmower which he paid an initial price of €100. Jack notes that he can fully use the product. Jack also reports having experienced additional costs of €10 on top of the initial price while no resolution or reimbursement figures are provided. In this case, Jack will be recorded as having suffered €10 in financial detriment:

ⁱ This weighting approach is utilised by the European Commission study.

ⁱⁱ While 9 out of 10 had a one of initial costs, variations across sectors are observed. For example, a sizeable share of TV (59%), Telecoms (37%) and transport (30%) had reported an ongoing payment. In contrast, 100% of problems in the child and baby category had one off initial costs.

$$[((100)(0)) + (10) + (0) - (0) = 10]$$

- Jane reports an issue she experienced with her internet provider and states that she pays for her subscription on an ongoing basis (monthly). The ongoing price for her internet is €30 per month and Jane noted that she could only use her internet with major difficulty and that the problem lasted for between 6-12 months.ⁱⁱⁱ Jane also noted that she experienced €25 in resolution costs and that she received €150 in compensation from her internet provider. In this example, Jane is estimated to have suffered €112.6 in financial detriment:

$$[((30*12)(0.66)) + (0) + (25) - (150) = 112.6]$$

5.5 Net Monetised Detriment

The value added associated with estimating the sum of net monetised detriment is twofold. Firstly, it allows us to identify which of the individual cost elements identified earlier in this chapter contribute most in terms of the overall level of financial detriment in the economy. Secondly, it allows us to examine developments across sectors to identify where levels of financial detriment are most pronounced. Together, these findings build on the market analysis carried out in chapter 4 and provides an additional layer of insight into potentially problematic sectors where the costs associated with suffering detriment are highest.

Accurately calculating the overall financial cost of consumer detriment at the economy wide level is challenging. Estimates from these calculations are extremely sensitive to changes in the underlying assumptions. As such, the results presented in the subsequent subsections of this chapter are used solely for illustrative purposes and aim to provide additional insights across sectors based on the costs associated with consumer detriment. To the best of our knowledge, the approach taken to calculate overall net monetised detriment in this study is unique in an Irish context. Consequently, any direct comparisons of aggregate figures estimated in the subsequent section of this chapter with other studies are likely to render misleading and inaccurate findings.

ⁱⁱⁱ Bounded data are provided as per the results presented in Figure 22. When standardising the initial cost variable (such as in this example), the upper limit values are used. This means that it is assumed that Jane paid up to a maximum of 12 months for her internet.

To illustrate the magnitude of this sensitivity, the following estimation scenarios are considered:

- 1) Scenario 1: full pass-through of financial costs associated with the initial purchase price of the good or service.
- 2) Scenario 2: degree of usability is offset against the initial purchase price to capture only the initial costs associate with consumer detriment.
- 3) Scenario 3: initial costs are excluded from the calculation and net monetised detriment is calculated using the remaining cost elements only.

Figure 22 demonstrates the level of variability in estimates conditional on underlying assumptions which ranges from €1.7 billion to less than €0.2 billion. Under scenario 1, net monetised detriment is estimated to be above €1.7 billion. However, this approach assumes that the underlying value of all upfront costs associated with problematic purchases are categorised as consumer detriment. This assumption is unrealistic and significantly overestimates the true value of detriment in this study. In contrast, excluding upfront costs (scenario 3) is likely to under report the cost of detriment within the economy, as many consumers that reported detriment could not use the good/service at all (see figure 19). Under scenario 2, net monetised detriment is estimated to be €968 million. This scenario adjusts for the usability of the product by capturing only instances of financial detriment in the cost equation where the good or service was unusable. Scenario 2 therefore strikes an appropriate balance between overestimating net monetised detriment by including all upfront costs versus omitting valid instances of financial detriment by excluding all initial costs paid by consumers for a good or service that was not fit for purpose. As such, scenario 2 is our preferred approach and used for the remainder of this chapter.

Figure 22: Net Monetised detriment by estimation method

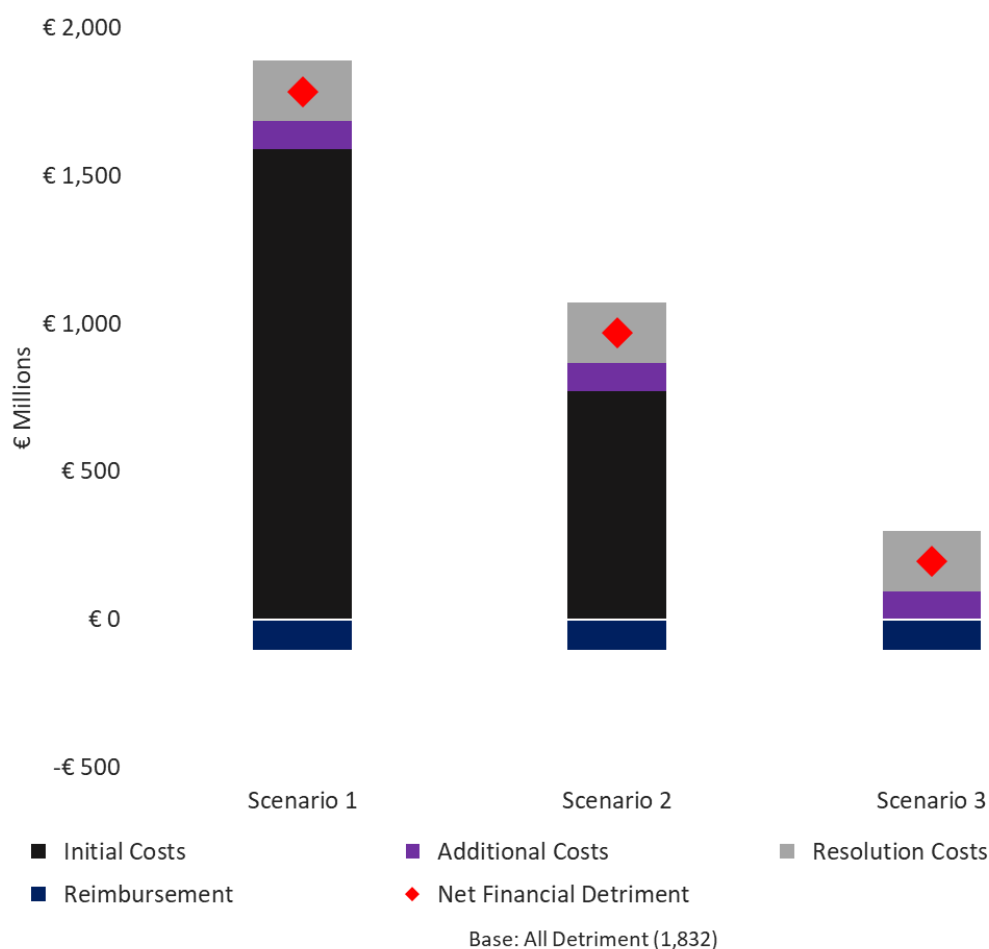
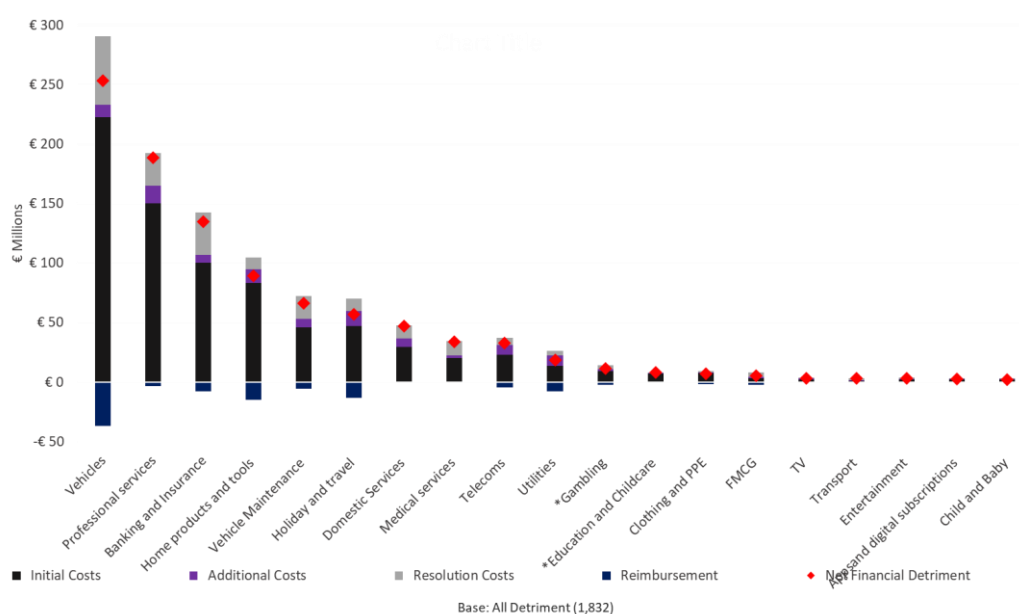


Figure 22 shows that initial costs (less the use value) were the main driver of the total value of detriment in scenario 2 and make up approximately €770 million of all financial detriment in Ireland. Given the fact that 92% of consumers paid some form of initial price (see Figure 17), the magnitude of these costs, relative to the other cost components, is unsurprising. The value of resolution costs (€205 million) incurred is more than double the additional costs reported by consumers (€95 million), despite a relatively equal share having reported incurring each category. The value of reimbursement reported by consumers made up a relatively small contribution and offset costs by some €105 million.

Focusing on developments in net monetised detriment across sectors, the value of financial cost was concentrated within a select number of markets. Specifically, *Vehicles* (€250m), *Professional services* (€200m), *Banking & Insurance* (€150m) and *Home products & tools* (€100m) were amongst the sectors that recorded the highest levels of net monetised detriment. Together these 4 sectors accounted for just over 70% of all net monetised detriment. The overall

level of detriment was driven in the main by the initial cost paid for the goods or services that were not fully usable. In this regard, it is unsurprising that *Vehicles* had the highest value of net monetised detriment as the initial costs of purchasing a vehicle is considerably higher than in many other sectors. Similarly, real estate purchases are captured under *Professional services*, which also explains why the value of detriment is relatively high in this market. Finally, while *Vehicles* had the highest recorded detriment cost, the value of reimbursements was also highest in this market.

Figure 23: Net Monetised detriment by market

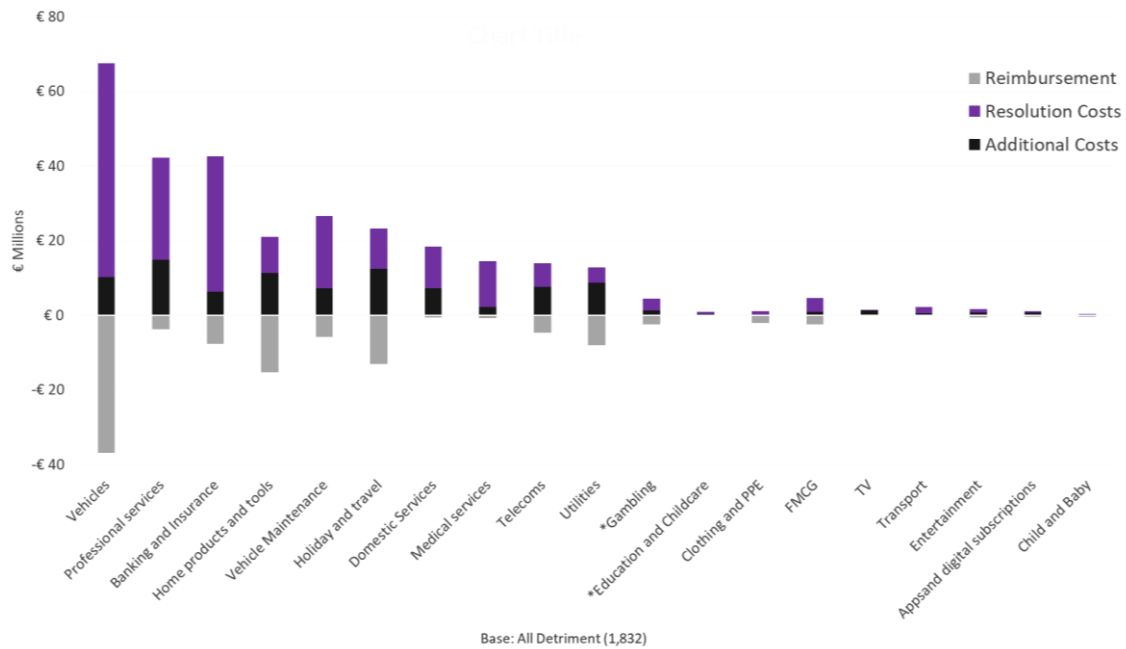


The magnitude of the initial costs shown in Figure 23 makes it difficult to identify developments in the remaining cost elements within sectors. Figure 24 therefore removes the initial cost elements of the net detriment calculation. Resolution costs were largest in *Vehicles* (€57 million), *Banking & Insurance* (€36 million) and *Professional services* (€27 million). Additional costs meanwhile appeared to be more evenly distributed across sectors. While resolutions costs were generally higher than additional costs in most sectors^{liii}, this was not the case for consumers experiencing issues relating to *Holiday & travel*, *Home products & tools*, *Telecoms*, and *Utilities*. This suggests that hidden or unexpected fees appeared to be more significant than the costs associated with resolution in these sectors. Finally, the value of reimbursement was largest within the *Vehicles* market. Low levels of reimbursement were also recorded in several

^{liii} Where the blue bars are larger than the orange bars.

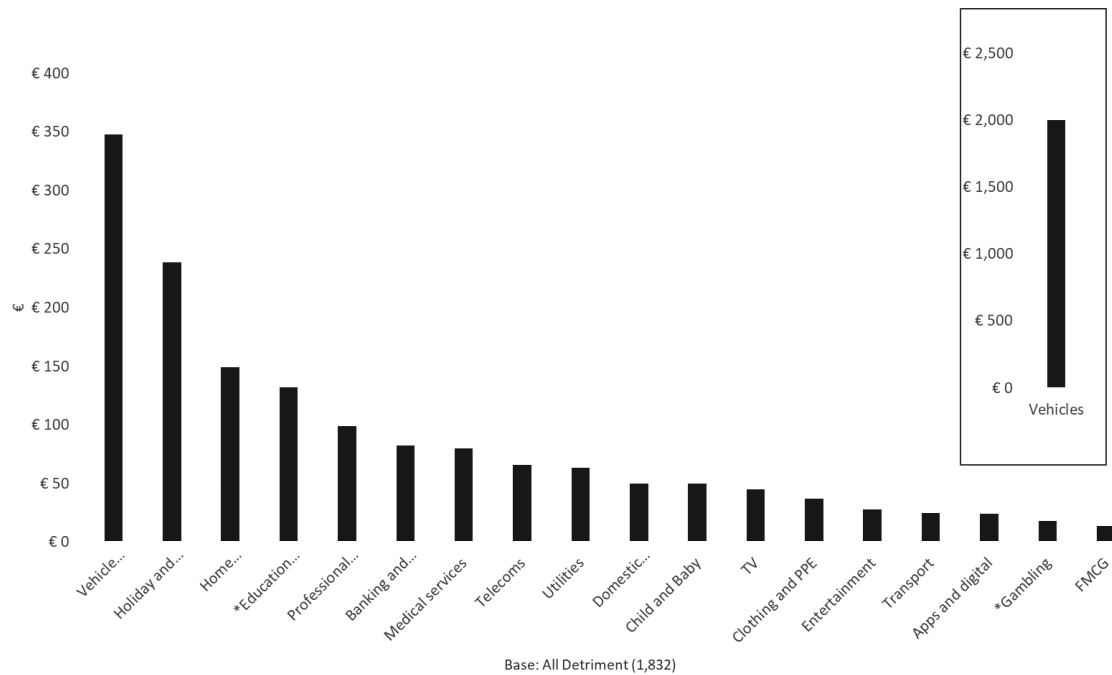
sectors despite reporting additional or resolution costs. These included *Professional services*, *Domestic services*, and *Medical services*.

Figure 24: Auxiliary costs associated with consumer detriment by market



Focusing on the median value of net monetised detriment provided insights into the typical value of detriment incurred at the individual level within each market. *Vehicles* remained the most problematic market with a median value of net monetised detriment equating to €2,000 (Figure 25). This implies that the median value of net monetised detriment associated with issues relating to vehicles had a value of €2,000. This was considerably above the overall median value of €60 and demonstrates the magnitude of the costs incurred by consumers experiencing issues with vehicle purchases. The median value of detriment associated with *vehicle maintenance* was also notable while the high median values associated with *Holiday & travel*, and *Home products & tools* were in line with overall detriment values shown earlier. At the other end of the scale, the median value of net monetised detriment associated with issues with goods or services relating to *FMCG* was considerably lower at €14.

Figure 25: Median value of net monetised detriment by sector



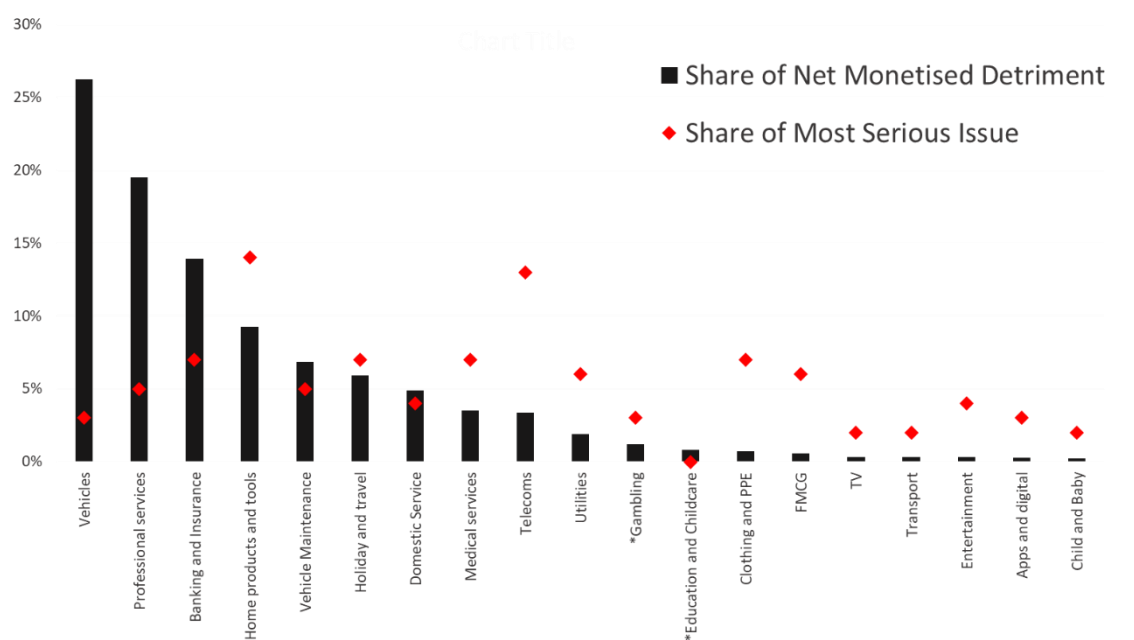
Some reordering of sectors was also observed in Figure 25 (when compared to the overall figures shown earlier), mainly associated with the value of issues experienced with *Education & Childcare* and *Child & Baby* products. While this market has a relatively small number of observations^{liv}, it may suggest that, despite relatively few consumers reporting *Education & Childcare* as their main issue, those who do typically report higher levels of detriment. To test this, we considered the share of ‘most serious issue’ within each sector alongside the value of net monetised detriment.

Figure 26 provides a more nuanced picture of financial detriment in Ireland by comparing sectors with relatively high (low) levels of net monetised detriment to sectors with a high (low) share of the most serious issue reported. In line with findings reported in Figure 21, the share of net monetised detriment was concentrated within a small number of sectors. Indeed, 48% of all net monetised detriment was concentrated in *Vehicles* and *Professional services*. By contrast, a relatively small share of respondents reported either sector as their most serious issue. Despite few people experiencing issues with *Vehicles* and *Professional services* (compared to

^{liv} Sectors with fewer than 25 observations are denoted with *.

other sectors), the high value of purchases in these categories appear to drive the high level of financial detriment reported. In line with earlier discussions in this section, *Professional services* captures real estate purchase services^{lv} while *Vehicles* captures the purchase of new and used vehicles, typically high value transaction on average. It is useful therefore to show that despite a small proportion of consumers overall reporting issues with *Vehicles* and *Professional services*, those who did generally make a disproportionate share of all net monetised detriment in Ireland. The fact that a small share of consumers reported either market as their most serious is also likely related to that fact that both sectors had relatively low engagement rates, meaning that fewer consumers reported making purchases in these sectors in the past 12 months (see Figure 6 in chapter 4). In contrast, *Telecoms* did not stand out as a sector with a particularly high level of financial detriment overall, despite the volume of consumers experiencing issues in this area being notably high. Finally, *Home products & tools* emerged as a market with a relatively high level of net monetised detriment (9%) overall, and where the highest share of consumers (14%) reported experiencing their most serious issue.

Figure 26: Share of net monetised detriment and share of most serious issue



^{lv} Some consumers who reported detriment in this area included capital costs (e.g. deposits).

Chapter 5 Summary

- This chapter looked to understand the impact of detriment on consumers through examining the financial costs associated with the most serious issue experienced.
- Accurately calculating the overall financial cost of consumer detriment at the economy wide level is challenging. Estimates from these calculations are extremely sensitive to changes in the underlying assumptions.
- Several cost elements are considered in order to quantify the scale of the costs associated with experiencing consumer detriment in Ireland. These include the initial cost of the good or service paid by the consumer; the usability of the item; any additional costs (e.g. hidden fees) or resolution costs (e.g. repairs, legal) incurred; and any compensation received.
- Net monetised detriment under the most appropriate scenario is estimated to be approximately €968 million. At an individual level, median net monetised detriment was €60.
- Despite relatively few people experiencing issues with *Vehicles* and *Professional services* (compared to other sectors), the high value of purchases in these categories appear to drive the high level of financial detriment reported.
- In contrast, *Telecoms* did not stand out as a sector with a particularly high level of financial detriment overall, despite the volume of consumers experiencing issues in this area being notably high. Finally, *Home products & tools* emerged as a market with a high level of net monetised detriment and as a problem market in terms of most serious issue reported.

6. Understanding the Impact of Detriment: Non-financial Costs

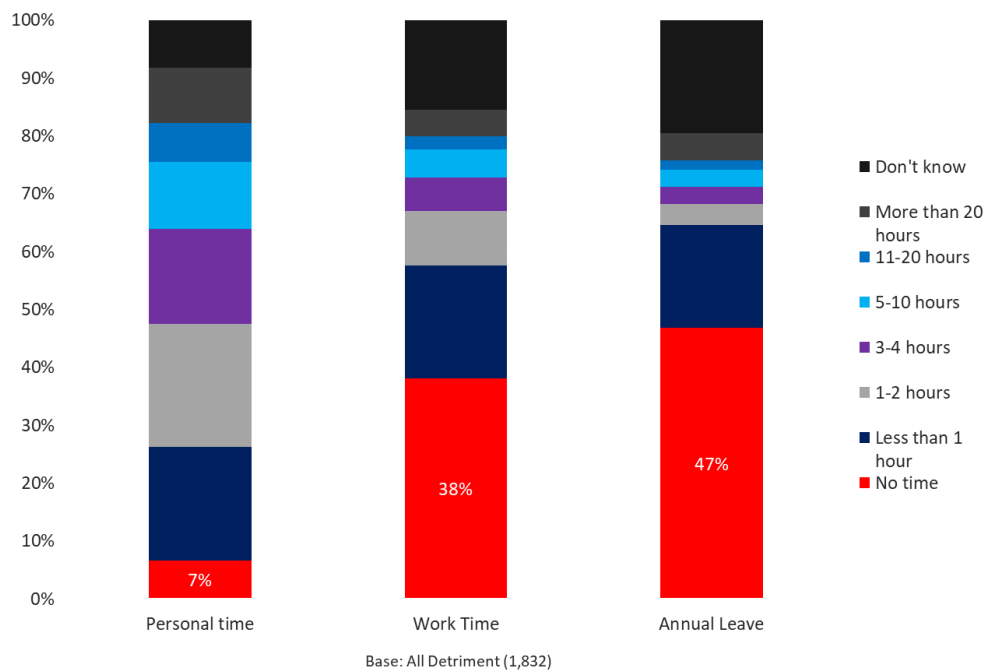
In addition to the financial costs outlined in the previous chapter, there were two key non-financial impacts arising from the detriment reported by consumers:

- **Time:** Consumers could input how much (if any) time they spent trying to solve the issues across their personal time, work time and annual leave.
- **Stress:** While this is a subjective measure, it is important to understand the mental impact of any detriment on consumers. Those who reported detriment were asked to indicate on a scale the level of stress/anxiety the issue caused them.

6.1. Time Lost

Time was divided into three categories: Personal, Work and Annual Leave.

Figure 27: Time spent trying to solve issue



It can be seen from the Figure 27, that the vast majority of time spent resolving an issue was related to personal time. Personal time had the highest proportion of time spent overall (93% spent some personal time) and the highest proportion of 20+ hours spent. Despite that, almost two thirds (62%) of consumers reported spending at least some time during their work day

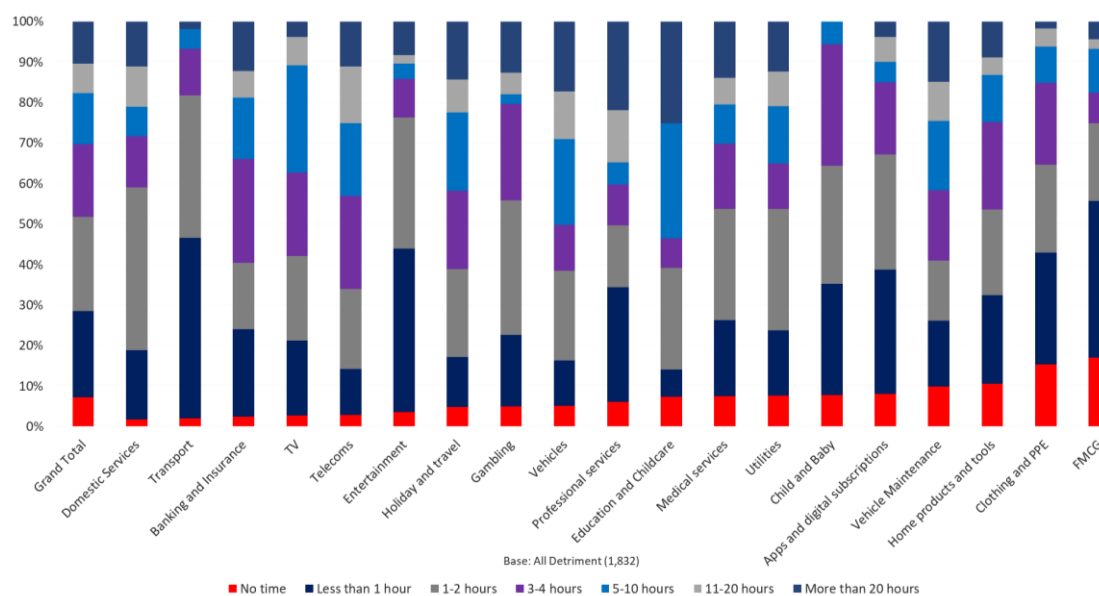
trying to resolve issues. This trend could have potential cost implications for employers and the wider economy.

Table 5: Consumers spending personal and/or work time addressing an issue

Personal Time ↓	← Work Time →						
	No time	Less than 1 hour	1-2 hours	3-4 hours	5-10 hours	11-20 hours	More than 20 hours
No time	6%	0%	0%	0%	0%	0%	0%
Less than 1 hour	9%	8%	2%	1%	1%	0%	0%
1-2 hours	11%	5%	3%	2%	1%	0%	0%
3-4 hours	9%	3%	2%	2%	1%	1%	0%
5-10 hours	5%	3%	2%	1%	1%	0%	1%
11-20 hours	2%	2%	1%	1%	1%	1%	0%
More than 20 hours	3%	2%	0%	0%	1%	1%	3%

The above table shows the proportion of consumers reporting detriment who spent work and/or personal time on an issue.^{lvi} In total, 36% of consumers reported spending as much or more work time trying to solve an issue than personal time^{lvii}, with 12% reporting spending more work than personal time.

Figure 28: Personal time (by sector)

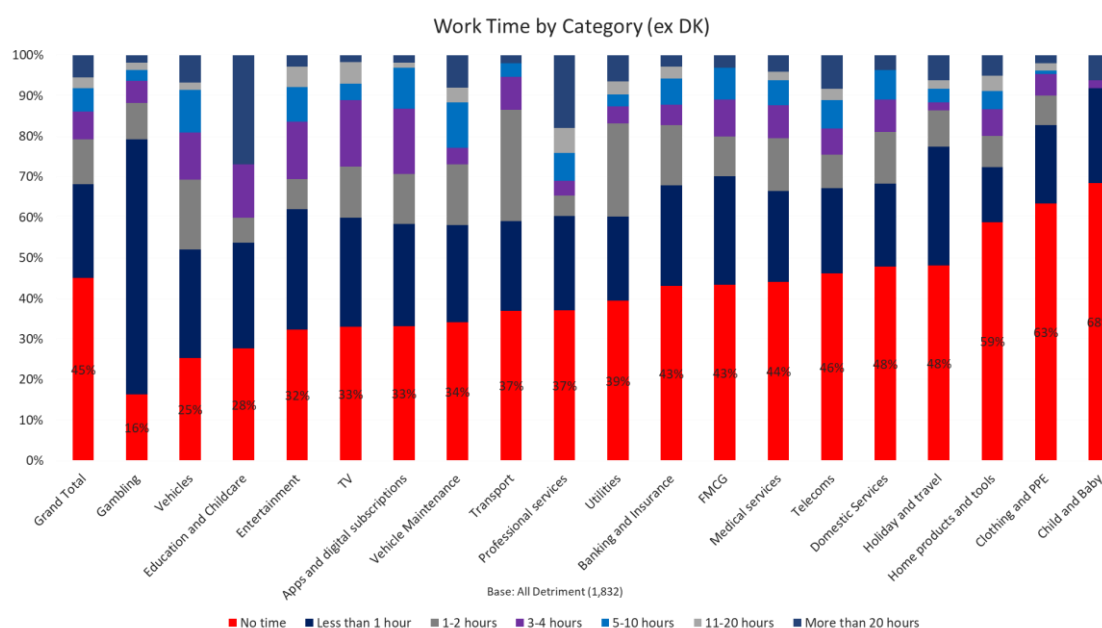


^{lvi} “Don’t know” responses excluded.

^{lvii} Note this is based on grouped data, and does not account for difference within the groups e.g. someone who spent 12 hours of work time and 13 hours of personal time trying to solve the issue will fall within the 11-20 hour bracket for both variables

In terms of personal time, *FMCG* saw the lowest amount of time generally with 14% of people spending no time.^{lviii} 39% of consumers who reported detriment in this category said they spent less than 1 hour trying to solve the issue. Conversely, *Education & Childcare* had a high amount of personal time spent with 53% of people reporting detriment in the category spending more than 11 hours of personal time trying to solve the problem (25% more than 20 hours). *Professional services* (22%), and *Vehicles* (17%) and *Vehicle maintenance* (15%) also had high values of more than 20 hours spent by those who reported detriment in the respective categories.

Figure 29: Work Time (by category)^{lix}



Looking at the categories contributing to solving issues during work time, gambling was the highest category, however two thirds reported spending less than an hour on the problem. *Education & Childcare* (27%), and *Professional services* (18%) had the highest proportion of consumers in the over 20 hours bracket.

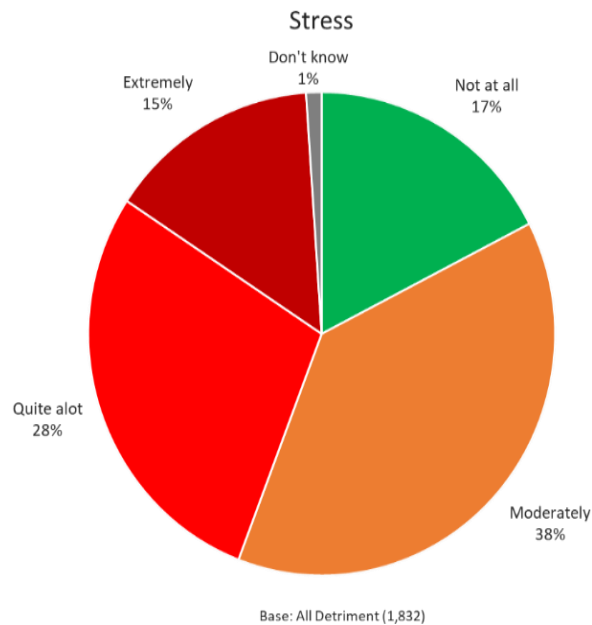
^{lviii} "Don't know" responses included.

^{lix} "Don't know" responses excluded.

6.2 Stress

Consumers reporting detriment were asked to record the extent to which they felt emotionally stressed as a result of the problem on a scale from “Not at all or only a little” to “Extremely”.

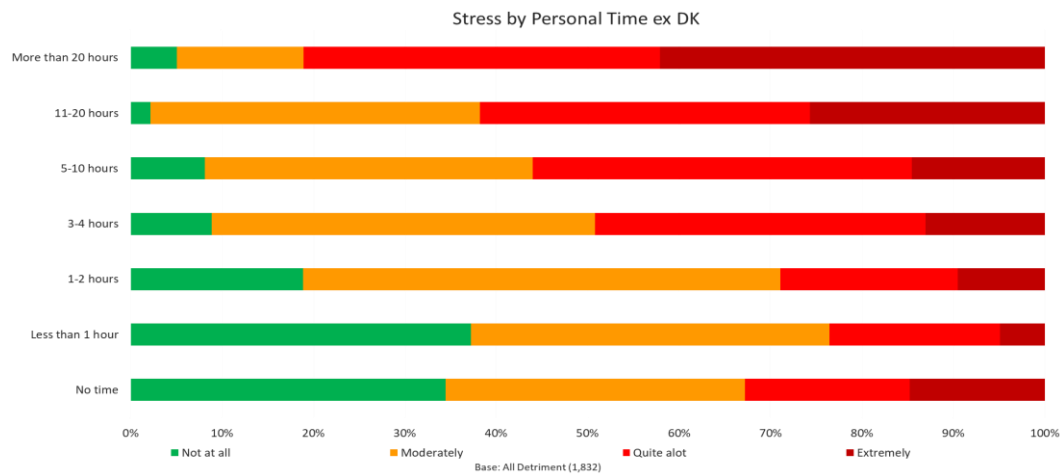
Figure 30: Level of stress



At a total level, 15% of consumers who reported detriment stated that they were “Extremely” stressed by the issue. A further one quarter (28%) reported being stressed “quite a lot”, while 38% were “moderately” stressed as a result of the detriment experienced.

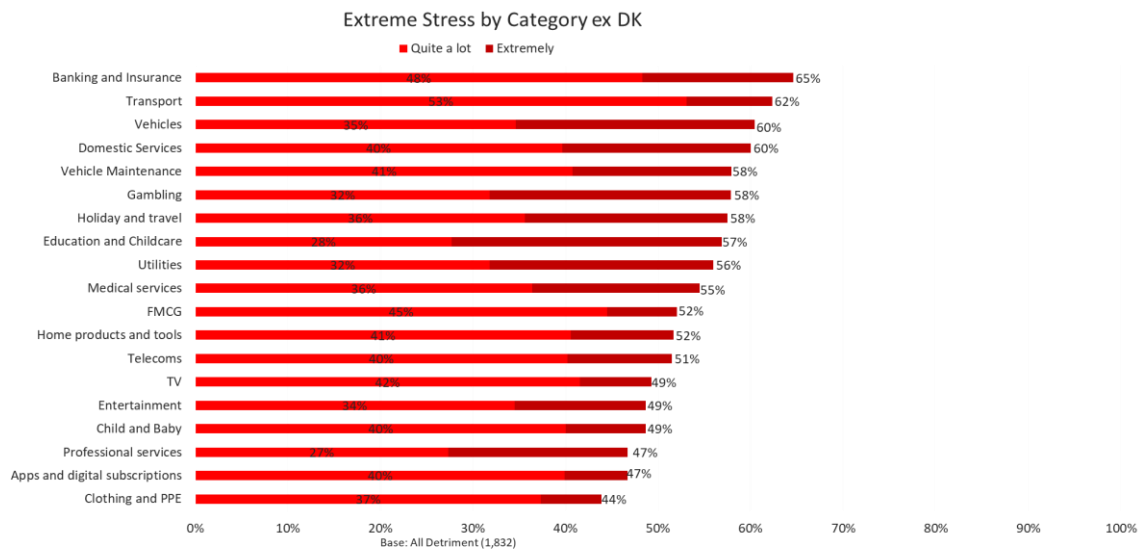
Stress was also related to the time spent with the proportion of both “extremely” stressed and “extremely/ quite a lot” stressed increasing as personal time spent increased. The exception to this was in the “no time” category with one third (33%) being extremely or quite a lot stressed. This is higher than either the less than one hour, or the 1-2 hour categories and could be related to inflationary cost issues, i.e. if consumers experienced inflationary costs for which they knew nothing could be done it would make sense that no time was spent solving the issues but they nonetheless experienced stress.

Figure 31: Stress by personal time



In terms of sectors, there are two approaches to observing stress levels. Looking firstly at extreme stress below, *Education & Childcare* stands out as a stressful area when issues occur with 29% of those reporting detriment in that category finding it extremely stressful. This is followed by *Gambling* and *Vehicles* (both 26%), *Utilities* (24%) and *Holiday & travel* (22%). All others are 20% or below.

Figure 32: “High” stress by categories^{ix}



The second approach is to examine the top two brackets for stress versus the bottom two. It provides a different perspective, with *Banking & Insurance* (65%), *Transport* (62%) and *Vehicles*

^{ix} “Don’t know” responses excluded

and *Domestic Services* (both 60%) now being the most stressful categories. This perhaps demonstrates the different levels of stress between more commonly interacted with categories, versus more high value categories with the latter tending to cause a higher level of extreme stress.

Chapter 6 Summary

- In addition to the financial costs outlined in Chapter 5, the key non-financial impacts arising for consumers were time and stress
- Time was divided into three categories: Personal, Work and Annual Leave. Personal time had the highest proportion of time spent overall (93% spent some personal time) and the highest proportion of 20+ hours spent.
- Almost two thirds (62%) of consumers spent at least some time during working hours trying to resolve issues.
- Consumers reporting detriment were asked to record the extent to which they felt emotionally stressed as a result of the problem on a scale from “Not at all or only a little” to “Extremely”.
- 15% of consumers who reported detriment stated that they were “Extremely” stressed by the issue.
- Stress was also related to the time spent with the proportion of both “extremely” stressed and “extremely/ quite a lot” stressed increasing as personal time spent increased. The degree of stress experienced by consumers also varied across sectors based on the type of stress measure.

7. Consumer Detriment and CCPC Activity

This research has shown that in the case of consumer detriment there can be a trade-off between impact and scale, where:

- (i) **A small number of consumers experience a high amount of individual loss:** an issue (e.g. related to a product/service defect, business model or practice) may negatively affect only a limited number of consumers but imposes significant costs on each affected individual (e.g. issue that arises when purchasing a vehicle).

and/or

- (ii) **A large number of consumers experience a low amount of individual loss:** an issue adversely affects a large number of consumers, but the harm experienced by each individual is relatively minor or the cost is low. For instance, a company might engage in pricing strategies that result in overcharging consumers by small amounts or implement unnecessarily cumbersome customer service procedures to deter communication and resolution.

As set out in the CCPC's Strategy Statement 2024 to 2026²¹ tackling both categories are important in making markets work better for consumers. While high-impact issues for consumers may garner more immediate attention from regulators due to their significant consequences, overlooking smaller problems can lead to long-term systemic issues. Low-impact detriment, although individually minor, can collectively erode consumer trust, perpetuate unfair practices, create unfairly gained profits, and contribute to a culture of complacency within industries. By addressing low-impact detriment alongside high-impact issues, we can foster a more equitable and consumer-centric marketplace where all consumers are protected and empowered to make informed choices.

The CCPC has a number of tools at its disposal to empower consumers and promote good practice, under the activity categories of: (i) **Enforcement & Compliance**; (ii) **Empower & Inform**, and (iii) **Advocacy & Research**. Relevant activities (recent/current/future) related to consumer detriment and the findings of this report are outlined below.

Enforcement and Compliance Activity^{lxi}

Where there are breaches in consumer protection law, the CCPC will continue to prosecute bad actors and work to obtain better outcomes for individuals. This has been a key focus in the case of markets where a small number of consumers have experienced significant financial losses. For example, since 2017, there have been 10 convictions (resulting in approximately €48,500 in compensation for consumers) following CCPC prosecutions against vehicle traders for offences such as providing false or misleading information to consumers during the sale of cars with false odometer readings or not informing a consumer about a previously crashed car. Based on this report there is clear economic justification to continue a focus on this area. Through its enforcement and compliance work the CCPC also aims to tackle issues associated with low value detriment that can impact a large number of consumers.^{lxii}

Recent/current work

- An important aspect of our work relates to enforcing legislation and promoting compliance on price display and price reductions.^{lxiii} The CCPC monitored thousands of price points through 129 instore and 43 online inspections in 2023, including 78 inspections in the *Home Products and Tools* category (incl. furniture and electrical appliances) and 30 inspections in the *Clothing* section (incl. sportswear).
- In 2023, the CCPC issued 25 compliance notices and 52 Fixed Payment Penalties (totalling €15,600) to traders. This represents an annual increase of 67% and 206% respectively.^{lxiv}
- The CCPC closely monitors product safety where applicable in sectors such as *Home Products & Tools* and *Clothing & PPE* as standard, in addition to *Baby Products & Toys*. In December 2023 alone, 21 web notices were issued by the CCPC to alert consumers in Ireland to unsafe products, in total over 25,000 individual units were affected by these notices.

^{lxi} This area involves increasing compliance of traders with competition, consumer protection and product safety legislation through means up to and including criminal prosecution of those in breach of those laws.

^{lxii} We apply resources using our prioritisation principles based on a number of criteria^{lxiii}, including: level of economic and/or physical harm; likely impact of the CCPC's action; strategic significance; and, risks, resources and costs.

^{lxiii} New obligations relating to transparency of price reductions were introduced under the European Union (Requirements to Indicate Product Prices) (Amendment) Regulations 2022 (Amending Product Pricing Regulations).

^{lxiv} For additional information on 2022 activity see: <https://www.ccpc.ie/business/wp-content/uploads/sites/3/2023/06/2023.04.25-Consumer-Protection-List-2022.pdf>

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- The CCPC recently participated in a European screening (sweep) of social media posts from influencers. The objective of the sweep was to verify whether influencers disclose their advertising activities as required under EU consumer law. As a result of the sweep, 358 influencers throughout Europe were earmarked for further investigation. National authorities will now contact these influencers to request that they follow the rules in place. Further enforcement action may be taken if necessary, in accordance with national procedures.^{lxv}

Future work

- Under the CCPC's Strategy 2024-2026 we plan to employ an expanded set of enforcement powers across our competition, consumer protection and product safety remit. To support this, we will commit the necessary resources to increase our activity relating to enforcement, compliance, inspections and sweeps.^{lxvi}

Empowering and Informing Activity

Our aim is to ensure that consumers are aware of their rights in relation to markets they interact with and also know the steps to take to ensure that any infringement of those rights can be rectified. This can be done in the first instance by contact with the trader, or subsequently through interaction with regulatory or other relevant bodies, such as the CCPC. In addition, the CCPC aims to raise awareness amongst businesses relating to their obligations under competition and consumer protection law.

The findings of this research can help inform how we target information related to detriment. For example, the finding that 71% of those reporting detriment contacted the trader, demonstrates that there is still a relatively high proportion of consumers (29%) who are not following the most effective process for resolving their issue. On the other side, businesses should be made aware that when issues occur this can cause a significant amount of lost time and stress for consumers, making it even more important that resolution processes are simple and efficient. We will continue to convey these types of messages to consumers and businesses

^{lxv} For more information see: [Results of a screening \("sweep"\) of social media posts \(europa.eu\)](https://european-commission.europa.eu/Results-of-a-screening-sweep-of-social-media-posts)

^{lxvi} Given the nature of our work, we do not usually declare in advance any specific market or trader which may become the subject of investigation or inspection. We also acknowledge that, as indicated in Section 1.5, the results of this research are based on the consumer's perception of detriment and are not necessarily evidence of market failure or non-compliance with consumer protection law on behalf of the trader.

through media engagements, advertising campaigns, social media activity and the issuing of guidance/guidelines to consumers and/or traders.

Recent/current work

- Over 35,000 people contacted the CCPC helpline in 2023 for information on consumer rights and personal finance, and the CCPC website recorded over 2.4 million visits in 2023. The CCPC's suite of online calculators and comparison tools for financial services and budgeting were used 795,961 times in the same period.
- In 2023, the CCPC ran large-scale public information campaigns on consumer rights around faulty goods and services. Targeted at consumers, the campaigns featured on television, radio, digital audio and display, social media, and in cinemas. A separate press and radio campaign ran in September to remind businesses of their key obligations under the Consumer Rights Act 2022.
- The Nursing Home Guidelines originally published by the CCPC in 2018 were updated in 2023.²² The updated guidelines were developed to assist the sector in understanding and implementing their obligations under the new unfair terms' provisions. This is particularly pertinent in contracts for the provision of long-term residential care services in nursing homes, given the unique nature of such contracts and the vulnerability of nursing home residents, coupled with the often complex and interrelated nature of the products provided under contracts of care. This requires service providers to comply with the requirement of good faith, ensure all contract terms are transparent and comply with all other obligations under consumer protection law. In December 2023, the CCPC issued a letter to 551 care homes across the country notifying them of the publication of the updated guidelines, while highlighting the main changes to the legislation and details on where the updated information could be found.
- In 2023, the CCPC published Joint Guidance for Social Media Influencers with the Advertising Standards Authority for Ireland (ASAI). The purpose of this guidance is to assist influencers, brands and agents in complying with legislation relating to the disclosure of commercial content. This guidance was developed as a result of research conducted by the CCPC in 2022 which found that a significant portion of consumers felt misled after purchasing products promoted by social media influencers.^{lxvii}

^{lxvii} For more information see: <https://www.ccpc.ie/business/wp-content/uploads/sites/3/2022/12/2022.12.12-172837-CCPC-Influencer-marketing-report.pdf>

Future work

- In 2024, the CCPC plans to further promote consumer rights through sponsorship of a prime time television programme on consumer issues, with a supporting campaign on digital audio and display and on social media. Separately, CCPC public relations campaigns will highlight a number of key consumer rights and product safety issues.
- The CCPC will continue to develop the CCPC website as a trusted source of information for consumers, building upon 2.4 million visits received in 2023.
- The CCPC has recently been designated to provide the European Consumer Centre (ECC) service in Ireland. Once established, the ECC will provide support to consumers who encounter issues with cross-border shopping and travel. The service will include providing information to consumers on their rights and assisting them to resolve an issue with a business.

Advocacy and Research Activity

Research conducted by the CCPC has identified a number of issues that affect consumers when engaging in particular markets.^{lxviii} A significant portion of these issues could be avoided or resolved through companies facilitating consumers in: (i) identifying the most suitable options to meet their needs; (ii) facilitating cancellation/switching in a timely manner with minimum disruption; (iii) providing efficient customer service communication when things go wrong or consumers require assistance. Many consumers struggle to identify their optimal choices, and even when they do, barriers are often erected, making the process of switching or cancelling cumbersome and costly.^{lxix} In addition, this research has shown that consumers can also experience significant delays in having issues resolved when engaging with traders. These hurdles make it more likely that a consumer will abandon search efforts or not pursue resolution to completion. This may inadvertently lead to consumers accepting higher costs without recognising the detriment. Monitoring in this area can be done in collaboration with sectoral regulators and the CCPC frequently engages with other regulators regarding markets in which there is a common interest in an effort to improve standards for consumers.

^{lxviii} Additional research and advocacy submission can be found here: <https://www.ccpc.ie/business/research/>

^{lxix} For more information see: [Compare and Switch: Understanding consumer behaviour in regulated markets - CCPC Business](#)

Based on research conducted by the CCPC or gathered by other independent, reputable sources, we will continue to promote open competition and advocate for greater consumer protections as necessary.

Recent/current work

- The CCPC is advocating – through engagements with the Department of Enterprise, Trade and Employment and with the Department of Justice – for an increase in the upper limit for the small claims procedure^{lxx} to include higher value claims and will also push for improvements to the process to improve consumer outcomes in relation to resolving issues. This is particularly relevant in the context of vehicles as data from this research shows that the current limit of €2,000 captures only 47% of car related issues reported in 2022-23.
- The CCPC has been advocating for policy measures to improve the banking market in recent years and will continue to engage with key stakeholders such as the Department of Finance and the Central Bank of Ireland (CBI) to help secure better outcomes for consumers. In particular, we have called on CBI^{lxxi} to
 - tackle ‘loyalty costs’ where the banks roll consumers onto higher mortgage interest rates at the expiry of a fixed term;
 - improve and extend the switching code to facilitate consumers switching banks;
 - identify actions which financial service providers must take in the best interests of the consumer in advance of the launch of a product or service.

We have also been engaged in measures^{lxxii} to make insurance markets more competitive and will continue to monitor developments in those markets.

- 2023 was a significant year in financial education with the announcement of Ireland’s first National Financial Literacy Strategy²³. The CCPC participated in the OECD International Survey of Adult Financial Literacy in 2023²⁴, the findings of which can be

^{lxx} This is a service provided by District Court offices and is designed to handle consumer or business claims inexpensively without involving a solicitor. The local District Court Clerk, who is the Small Claims Registrar, processes small claims. The claim cannot exceed €2,000. For more information see: www.courts.ie

^{lxxi} See 2023 submission to the Central Bank of Ireland Consumer Protection Code Review

https://www.ccpc.ie/business/wp-content/uploads/sites/3/2023/07/CCPC-Submission-to-Consumer-Protection-Code-Review-Discussion-Paper_31-March-23.pdf

^{lxxii} See 2020 public liability study <https://www.ccpc.ie/business/ccpc-public-liability-insurance-study-published/>. In addition, see report on investigation into potential price signalling in motor insurance: <https://www.ccpc.ie/business/ccpc-publishes-report-on-private-motor-insurance-investigation/>

used to inform the National Financial Literacy Strategy. Additional work is currently ongoing in this area.

- To improve the information available to consumers prior to purchasing a second hand vehicle, the CCPC is examining how consumers currently access car history and will make policy recommendations for improved access to reliable information.
- The CCPC recently engaged with the European Commission's Digital Fairness Fitness Check on potential new consumer rules making it possible to cancel a subscription by the same means used to sign up.

Future work

- In 2022, the tools at the CCPC's disposal for competition enforcement were strengthened with the enactment of the Competition (Amendment) Act 2022 which allows the CCPC to impose administrative financial penalties for certain breaches of competition law. There remains a gap in the CCPC's ability to impose administrative financial penalties for breaches of consumer protection law. The CCPC is of the view that serious consideration needs to be given to closing this gap so that breaches of consumer protection law are subject to a wider range of effective enforcement measures including administrative sanctions. Therefore, where there is evidence that our existing powers are ineffective at tackling breaches of consumer protection law, the CCPC will advocate for the strengthening of its enforcement powers. This may include administrative powers to impose fines for national breaches of consumer protection.
- The CCPC has been a consistent advocate for reform of the legal sector.^{lxxiii} We will continue to push for further reforms to modernise the legal sector, to make these markets more competitive and to promote access to justice and avenues for redress for consumers with key stakeholders.
- The CCPC will be undertaking research in 2024 to examine the issues faced by consumers when engaging with estate agents.




^{lxxiii} For more information see: <https://www.ccpc.ie/business/research/market-studies/study-legal-professions/#:~:text=The%20proposals%20made%20in%20this,the%20Authority's%20key%20outstanding%20recommendations>

Appendices

Appendix A: International Context

As previously noted, a number of studies have been conducted internationally examining consumer detriment. The table below provides an overview of recent studies in the area.

Table 6: Summary of main international studies

			
	2017	2022	2022
Name	Measuring consumer detriment in the European Union	Measuring Financial Consumer Detriment in E-Commerce	Consumer Protection Study
Focus	Wide detriment focus, but only in 6 sectors: clothing and footwear; large household appliances; loans, credit and credit cards; train services; mobile telephone services; and electricity services.	eCommerce only 18 product categories 7 problem categories “Most serious” selection	11 market clusters - 44 sectors, comprising 12 item sectors and 32 service sectors
Methodology	Survey conducted in 4 EU Member States: France, UK, Italy and Poland. Online and F2F used (2,000 respondents) Mystery shopping also included	13 OECD countries Online only methodology Approximately 2,000 respondents per country	6,582 respondents Online first methodology, with option to complete by phone
Definition of Detriment	Revealed personal consumer detriment is defined as negative outcomes for individual consumers that they become aware of following the purchase or use of a good or service, measured relative to what would reasonably have been expected given the type of transaction	Consumer detriment is defined as the harm or loss that consumers experience, when, for example, the goods and services they purchased through e-commerce do not conform to their (reasonable) expectations with respect to quality, performance or delivery conditions; when they suffer from unfair contract terms; or when they have to pay more for a product than what they could have reasonably expected (e.g. due to hidden or extra costs)	An experience with an item or a service that caused stress to the consumer (psychological dimension), cost them money (financial dimension), or took up their time (monetary dimension)

Calculation of Detriment	The study calculates post redress financial detriment by subtracting substantial redress ^{lxxiv} from pre-redress financial detriment ^{lxxv}	The study calculated the post-redress detriment by subtracting redress ^{lxxvi} received by the consumer from the pre-redress ^{lxxvii} detriment experienced by the consumer	The study calculated detriment by subtracting the mitigation components ^{lxxviii} from the sum of the cost components ^{lxxix} in order to calculate the net monetised detriment
Additional/secondary issues examined	<p>Estimation of magnitude of personal consumer detriment using the 'fair price' approach^{lxxx}</p> <p>Magnitude of personal consumer detriment comparing purchases over the internet vs other sales channels and cross-border vs domestic purchases</p>	Understanding of issues in e-commerce for consumers. The study also included an analysis of potential additional impacts of experiencing detriment	Probability of experiencing detriment due to socio-economic and demographic characteristics

Appendix B: Online vs. F2F

This study has been conducted using both a face-to-face (F2F) methodology and an online methodology. In the use of a F2F methodology, the survey is typically completed by an interviewer who asks questions of the respondent but controls the input. This is normally done on the doorstep of the respondent's home or can be completed inside the home for longer

^{lxxiv} Substantial redress covers monetary redress and value of repairs and replacement.

^{lxxv} Pre-redress financial detriment covers reduction in value of good, loss of service, over/extra charges and costs of sorting out the problem.

^{lxxvi} Redress covers reimbursement or compensation and repair or replacement of the product

^{lxxvii} Pre-redress detriment includes the price paid for the good or service, extent to which it could be used after the problem occurred, duration of the problem and additional or hidden charges etc

^{lxxviii} These are defined as "elements that mitigated the overall cost faced by the consumer."

^{lxxix} These are defined as "costs that consumers face at the initial purchase and when dealing with detriment".

^{lxxx} Respondents were asked to indicate the most they would pay at present for the good or service taking into account all the trouble they had as a result of the problem, including any financial loss, time loss, and emotional stress.

surveys if the respondent is comfortable with that. Respondents are typically selected from seed addresses^{lxxxix} with no prior warning of the survey's existence.^{lxxxii} By contrast, online surveys are sent by email invite to consumers who are members of an online panel. The invite contains a subject text giving the respondents an insight into the topic, an estimated time to complete and a reward value if the respondent qualifies.

Various international studies on consumer detriment have used both online and F2F methodologies. The European Commission's 2017 study used a combination of online and F2F methodologies. Whereas, the OECD's 2022 study²⁵ used an online only methodology. This is likely due to the fact that the focus of the OECD's study was on online consumers' experiences of consumer detriment in e-commerce.^{lxxxiii} The study conducted by the UK's DBEI in 2022 used mixed-mode fieldwork design. For the main sample, all of the survey participants were initially invited to take part online, with those choosing not to, or unable to complete the survey online being followed up with by telephone interview.

There are various strengths and weaknesses associated with both methodologies as set out below:

F2F:

The use of a F2F methodology for conducting social surveys is considered to be the gold standard in Ireland. It ensures that more vulnerable communities can be included in the data, including older consumers or those without phone/online access as well as making it easier to achieve a representative sample due to the use of seed addresses. These ensure representation across social class and geographical area – something that is not built in to telephone or online surveys meaning that quota controls or weights are used more heavily in these surveys. The ability to apply findings to a wider population is a key aspect of any survey with national or policy implications.²⁶ In the F2F survey for this study, sampling used seed addresses which helped to ensure that the survey was nationally representative.

^{lxxxix} Seed addresses are starting points for interviewers to begin their fieldwork from. They are drawn from demographic analysis of local electoral areas.

^{lxxxii} Provision can be made for call-backs if the respondent does not have time to complete when the initial call to the respondent's home is made.

^{lxxxiii} For the purposes of the study, the OECD defines these consumers as "Internet users that have made at least one online purchase and who had encountered at least one e-commerce problem in the last 12 months."

However, there are also some weaknesses associated with the use of a F2F methodology. While the physical presence of an interviewer can be more likely to focus the respondent^{lxxxiv}, it opens up the possibility of interviewer bias. This can be conscious or unconscious. For example, when asking a question, an interviewer may unintentionally place different emphasis on wording leading to different interpretations by respondents. The presence of an interviewer can also place greater time and social pressure on the respondent which in certain circumstances can lead to less accurate or less detailed responses.²⁷ Similar to issues observed in online surveys regarding self-selection bias, this may also be observed in F2F surveys if the number of targeted consumers not willing to participate is substantial.

Online:

One of the main strengths of using an online panel to conduct a social survey is that it can include elements of the population who may not appear in F2F research. Socially isolated people who may not answer the door or may not be comfortable answering a survey to an interviewer may have a higher chance of being included in online surveys. Those living in hostels, hotels or other forms of temporary accommodation who have online access may also be more likely to appear. Respondents may also be more open and honest in their answers in an online survey due to the absence of a human control figure and the greater anonymity this type of survey affords. For example, in the context of a consumer detriment survey, a respondent who has experienced detriment in an area they feel embarrassed or shameful about (e.g. an addiction such as gambling) may be less likely to report this to an interviewer than if the survey was completed online^{lxxxv}. The study on Consumer Detriment²⁸ in the UK conducted by Citizens Advice in 2016 found that incidents of detriment in gambling were higher amongst online respondents than in the F2F survey. The use of an online methodology also provides respondents with an extended period of time to complete the survey as they complete them in their own time whereas a F2F interview can have time pressure either from the respondent or the interviewer.

^{lxxxiv} Even with telephone interviewing, where an interviewer is asking questions but not present, the respondent may also engage in other activities causing a distraction. See Holbrook, L.A., Green, C.M and Krosnick, A.J. (2003) 'Telephone versus Face-to-Face Interviewing of National Probability Samples with Long Questionnaires: Comparisons of Respondent Satisficing and Social Desirability Response Bias', *Public Opinion Quarterly*, 67(1), pp.79-125.

^{lxxxv} This is defined as social desirability bias in literature. For example, see Latkin, A.C., Edwards, C., Davey-Rothwell, A.M and Tobin, E.K. (2017) 'The relationship between social desirability bias and self-reports of health, substance use, and social network factors among urban substance users in Baltimore, Maryland', *Addictive Behaviors*, 73, pp.133-136.

Respondents also have more time to select the answers that apply and to review them before submitting.

The use of an online methodology for conducting studies can also have disadvantages. In an online study, the selection process is less rigorous and some key data (such as response rates) is not as readily available. The use of consumer panels^{lxxxvi} means there is already a self-selection bias present which would not be evident to the same extent as in F2F research^{lxxxvii}. There also remains a concern that panels are not fully representative of the general population. Indeed, some panels may omit whole swathes of the population, most notably those not digitally active. This has clear ramifications for surveys investigating topics such as detriment as there may be specific types of issues experienced by this group.

Other biases may also exist. For example, it is possible that respondents completing an online survey would be more predisposed to shopping online than the general population. A higher level of misinterpretation of questions and answer codes may also be observed in an online survey due to the absence of an interviewer who can help to ensure that answers are categorised correctly and also sense check answers. Those completing online surveys may be doing so while engaging in other activities (online or offline) which could impact on data quality. A study by Heerwegh and Loosveldt in 2008 found that “the web survey elicited more DK (don’t know) responses, more nondifferentiation on rating scales, and a higher item nonresponse rate”²⁹. However, as noted earlier, having an extended period of time to complete the study could enhance the volume of data collected.

^{lxxxvi} In the case of this study, the panels used were CINT, Lucid Marketplace, Make Opinion, Norstat, Pure Spectrum and Sago.

^{lxxxvii} In early adoption of online surveys there was also some issues related to links being forwarded or functioning of the survey, such as fraud. These were specifically controlled for in this instance through the use of unique links and quality controls applied to respondents’ answers. These included controls for repetitive answers and speed answering.

Appendix C: Additional information on types of detriment

Detriment can be experienced in different ways which require different approaches for research. The main categories of detriment are revealed detriment and hidden detriment.

Revealed Detriment

There are two aspects of revealed detriment that require consideration: detriment experience and personal detriment.

Detriment Experience:

Direct and Indirect Detriment

There is increasing attention paid to detriment experienced beyond the individual consumer who purchased the product or service. There could be further detriment experienced by them personally (e.g. a cancelled flight led to a missed business opportunity or a burst pipe after a renovation damaged the contents of a house) or it could impact other consumers (e.g. gifts which need to be brought back or replaced, or the consumer could have recommended the product/service to someone else prior to the issue who then experienced the same problem).

The issue of direct detriment experienced by the consumer themselves was dealt with in the 2014 study, however potential detriment experienced by others was not included. The CCPC's 2022 study³⁰ conducted into Influencer marketing found that 60% of those who follow influencers had recommended a product to a friend or family member as a result of an influencer mentioning it. Separately, one-in-four of those who had purchased a product as a result of an influencer mention subsequently felt misled. While not directly comparable, there is likely to be similar dynamics of recommendations and purchase in general markets also and the potential for detriment in those circumstances is worth exploring.

Asymmetrical Detriment

Not all detriment is equal. The 2014 CCPC study captured the value of the detriment consumers experienced. However, the report did not seek to place this in the context of the consumer's individual circumstances. Two individual consumers can experience similar detriment arising from similar products but the impact can be disproportionate. Even in cases where one consumer experiences higher values of detriment, the overall impact may differ. An example of this would be a consumer who earns €30,000 spending €1,000 on a holiday which was

subsequently missed due to a flight cancellation. If the consumer had difficulty recouping the cost of the holiday the impact on their overall finances and possibly emotional wellbeing could be large. This is compared to a person earning €100,000 who may have booked a €2,000 holiday and had the same issues after the same flight was cancelled. Financially they have lost more in absolute terms, but proportionately they have suffered less of a financial hit.

Emotionally there are also differences in experience. What if the first person above was flying on holiday, but the second person missed a family funeral or a job interview that had knock on impacts? Emotional factors are harder to control and account for. The 2014 CCPC study did ask about emotional response to issues, but did not control for these in results. Creating a questionnaire which can do this could further anchor the results in consumers' reality.

There is also the issue of the importance of the product or service through which the detriment occurred. A washing machine and tumble dryer could be priced the same but for consumers the relative impact of a washing machine breaking is likely to be higher than that of a tumble dryer, for which there may be more ready replacements (i.e. other clothes drying options).

There is also recognition in some studies (notably the European Commission's 2017 consumer detriment study) that negative outcomes can be subjective. Consumers may bring their own life experiences and expectations into how they handle detriment. A consumer with tech experience may be able to solve a problem on their own compared to someone who is not as tech savvy who may need to return to the point of purchase for a fix. Likewise, the expectations of the product can determine the level of perceived detriment and how the issue is viewed by consumers.

Personal Detriment

Personal detriment refers to outcomes experienced by consumers. The 2017 European Commission study identifies five types of personal detriment:

- Financial detriment: Monetary costs and losses incurred by the consumer as a result of the issue experienced with a product or service. For example, costs related to the amount paid for the good or service or costs related to repairing or replacing the good or service.

-
- Time loss: Total amount of time spent by the consumer trying to resolve the problem or time loss experienced as a result of the problem. For example, time spent travelling to the trader's premises or loss of leisure time due to the problem.
 - Psychological detriment: This refers to the 'emotional cost' experienced by consumers as a result of the problem. Consumers can experience emotions such as stress, anger or frustration as a result of the problem.
 - Physical/physiological detriment: Consumers may experience a physical injury depending on the product or service involved. For example, the crashing of a faulty car or use of an unsafe sporting helmet.
 - Social detriment: Consumers experience a lack of trust in others due to the problem experienced.

Hidden Detriment

Like other definitions above, "Hidden detriment" can have multiple meanings. In essence it refers to any detriment, or potential detriment experienced by consumers which is unlikely to be reported and therefore recorded. This could include:

- Pending detriment: where a consumer may not be aware that a product purchased is defective. For example, a car part may be faulty from the time of purchase but this will not be known to the consumer until it breaks down.
- Unknown detriment: a consumer may not have the knowledge or experience to know that they experienced detriment. An example of this could be a medical practitioner using outdated medical practices which delivered sub-optimal results versus newer methods. Another example, which some consumers may be aware of, is detriment experienced through purchase channels e.g. consumers purchasing online can avail of discounts not provided to offline consumers.
- Accepted detriment: A consumer may put up with an issue for a number of reasons rather than complain or report it. For example, a consumer could have been a customer of a number of broadband providers who promised high speed connections but didn't deliver. If they switched to a new provider who still did not provide the high speeds but was faster than any previous connection, they may feel compelled to remain with the provider and not complain.
- Offset detriment: An issue which is quickly rectified may not be recalled by consumers. For example, a billing error at a checkout may have been noticed at the time and fixed. This meant that no detriment was experienced by the consumer. However, the

potential for detriment was present and if the consumer had not been checking the prices this would fall into the unknown detriment category.

- Minimal detriment: Some minor cases of detriment may not be recalled by consumers due to their perceived triviality. However, if these occur frequently in high volume sales categories they can lead to large overall detriment in a market. The incorrect pricing case above would again be an example.
- Behavioural detriment: With the proliferation of behavioural bias-based techniques in selling and marketing, a new avenue of hidden detriment has come more to the fore. While some consumers will recognise biases in their behaviour and adapt, many will not. Approaches based on these biases (such as status quo bias or the use of anchor pricing) or nudges used in markets can lead to consumers spending more on products than they otherwise should. While these are personally experienced and may differ by consumer, they lean more towards the structural detriment classification and are hard to unearth in a survey-based approach. The European Commission 2017 report however, points to areas where the use of such biases may be highlighted by consumers e.g. complexity in tariff pricing or misleading advertising practices.

Hidden detriment is a challenging prospect to approach in a study. By definition, a consumer will not report something they cannot recall and/or are not aware of. While questions can be worded in order to prompt memories of instances of detriment, no matter how small, it remains more likely that larger examples will be recalled first.

Appendix D: Overview of Relevant Legislation

Consumer protection law is fragmented across multiple pieces of Irish and European legislation. An overview of the main legislation which may be of relevance to consumers in this area is set out below.

Unfair Commercial Practices Directive (UCPD)³¹

The UCPD is the overarching piece of EU legislation regulating unfair commercial practices in business-to-consumer relationships. It covers unfair commercial practices that occur before, during or after a business-to-consumer transaction.

Consumer Protection Act 2007 (CPA)

The main piece of legislation governing commercial practices in Ireland is the Consumer Protection Act 2007 (CPA) which transposed the UCPD into Irish law. It applies to anyone acting for the purposes of their trade, business or profession. It also applies to anyone acting on behalf of a business and can also include anyone who promotes goods or services on behalf of a business. The CPA requires that traders are transparent in all their dealings with consumers and places a wide range of responsibilities on them. The CPA protects consumers from “misleading” “aggressive” and “prohibited” commercial practices.

Consumer Rights Act 2022 (CRA)

The CRA provides consumers with a range of protections when they purchase goods or services, (including digital content and online services) by placing a number of obligations on traders. The CRA provides extra protections to consumers if goods or services are sold to them online, by mail-order, by phone or on their doorstep. It also expands a consumer’s right to redress if something goes wrong with an item purchased. This affords extra protections to consumers when purchasing goods and more definitive options in terms of how they are legally entitled to resolve such issues. The CRA also sets out obligations on traders to ensure that their contracts do not contain terms that are unfair to consumers.

European Union (Requirements to Indicate Product Prices) (Amendment) Regulations 2022³²

These Regulations set out new obligations for traders when making price reduction announcements. A trader must now provide specific information when announcing a price

reduction, in particular by including the 'prior price'. They must identify the lowest price applied for the good during at least the last 30 days before applying the price reduction.

Product Safety³³

The CCPC is the market surveillance authority and the competent authority in Ireland for safety of non-food consumer products covered by certain EU Directives and Regulations. These EU Directives and Regulations have been transposed into Irish law by way of various Irish Regulations. They cover a variety of products including toys, low voltage equipment, personal protective equipment for consumer use, appliances burning gaseous fuels for consumer use and consumer products regulated by the rules on general product safety.

For the purposes of this study, a legal framework is not used as the benchmark for assessing detriment. The use of such a framework to assess detriment would result in a narrow assessment that only considers instances where consumers experience negative outcomes as a result of illegal actions by traders. Consequently, the conclusions reached would be circular in nature and would not enable commercial practices to be identified for inclusion in future legislation.

Appendix E: Data Cleaning and Considerations

Data Considerations

Back-coding: In some cases the respondents answered questions in a way which was then deemed to be inconsistent at the point of data cleaning. These respondents were then back-coded into other answers following the completion of fieldwork^{lxxxviii}. In cases where this occurred the results for those questions are based on the valid responses received after the back-coding was complete.

Duplication of calculations

In some instances, the data received appeared to show that double counting was present or some other issue was contributing to difficulties in calculating the cost. This was observed in:

- Q3a
- Q5a and b: initial cost of product/service
- Q10: Additional costs
- Q15: Other costs
- Q16: Reimbursement

Issue 1: Counting the actual fee paid at q5a/b and Q10 or Q15 – issue if represented more than the expected fee (Q10). Recommend removal of Q5 costs from any cost calculation.

Issue 2: How to treat the partial functioning or delayed delivery of an item for which full price was paid.

Issue 3: Where someone added additional fees at Q10 and again at Q.15. Some cases are obvious where the sum of a number of Q15 entries adds up to exactly the same

Issue 4: Respondents answered on multiple issues despite being asked for most serious. This was mainly an issue in online, not seen in F2F.

Issue 5: No costs listed/ don't know: Review questionnaire e.g. Crypto, some areas such as electricity listed reimbursements but no costs

Understanding of questionnaire

The F2F survey had the control of an interviewer which gave a level of consistency to results. The online survey was self-reported and only controlled by the confines of the script. This led to the

^{lxxxviii} An example of this would be at Q9 where respondents were asked for the general category of their issue and then given a list of more specific problems relating to that category, including an option to enter free text.

potential for misinterpretation e.g. in the “loss of earnings” category. Some large figures were seen in the online responses to this question and there is potential that the respondents interpreted it as loss of money which they earned and spent on the issue/product, rather than direct loss to earnings as a result of the issue. One case highlighted the cost of a plane ticket which was exactly the same as the loss of earnings category, with no other costs included. While there is a chance that the respondent did lose income as a result of the flight, it is more likely that they selected to put the value in the earnings category as it did not fit readily into any other and they wanted to record the full loss. The difficulty with these types of entries is that there is no clear way to know this and responses were left unaltered from what was entered in these cases for that reason.

Other potential differences of understanding relate to how direct the issue was to any losses. Any issue will have potential knock on impacts which can continue to grow over time. If a consumer’s car breaks down and they cannot give a lift they promised to someone else for work, for example, the detriment is felt not just by them but by the person they were due to give a lift to also. Respondents’ understanding of this chain of events and how directly related it was to their given issue could also differ, although the questionnaire was worded to try to overcome this problem.

An example given in the questionnaire concerned a parking space which the consumer thought was “secure” but their car was damaged while in the space. The damage was “beyond repair” and the consumer included the cost of a new car in the directly related costs. This may not be how other consumers would have recorded the costs for this type of incident. In another case an airline cancelled a flight causing a loss of the ticket price. The consumer reported the loss but no additional costs such as hotels, transfers and other bookings, and did not indicate if another flight had to be booked and at what cost. These are all additions which some consumers may have made. For example, some consumers spoke of medicine not being in stock but did not mention any costs in relation to the issue.

Interpretations of Detriment

The definition in the questionnaire related to issues or problems which “cost you money, took up your time or caused you stress”. This mirrors the wording used in previous studies in Ireland and elsewhere but did leave a degree of flexibility in interpretation. Issues which were highlighted by consumers included rent, mortgage or utility increases, food poisoning, theft or damage on someone else’s property. In the researchers’ opinion it appears likely that some respondents took

a loose interpretation of detriment and the value attached to it and if the wider sample had shared this approach, it would be likely that the value of detriment in the study would be higher. Other cases: time spent looking for best quote because their insurance was too expensive, having a bad time on holiday.

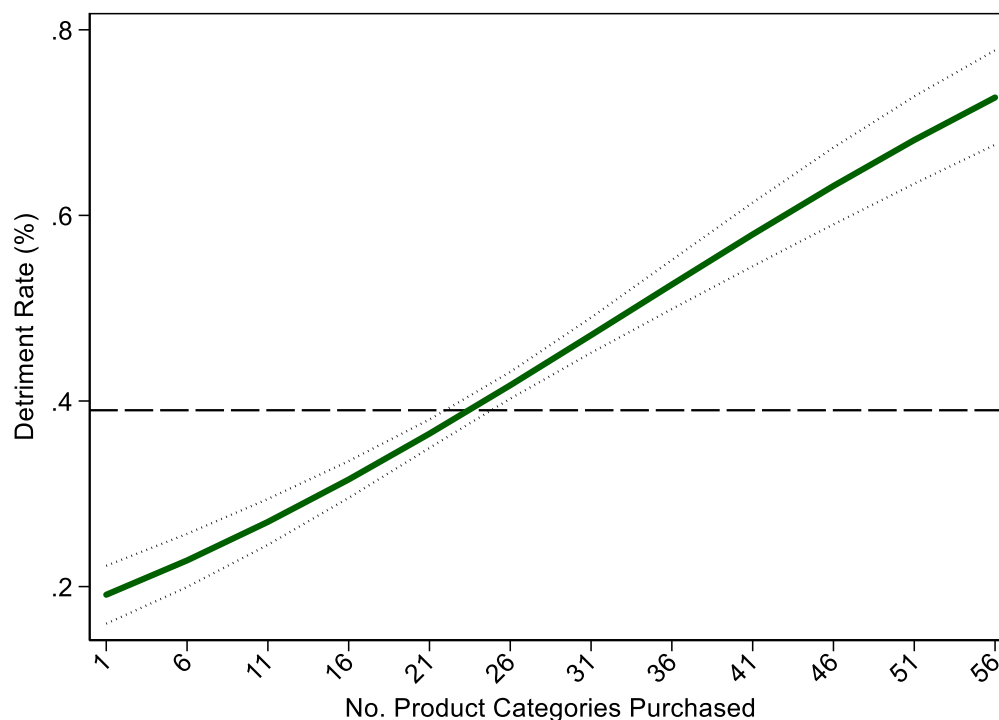
Issue of health costs. Some people recorded full costs in relation to health as detriment even though this seems unlikely. For example, a consumer recorded the full costs of a dental service as both “cost of repairs” and “health costs”. From the information available, the issue actually related to a problem getting an appointment which could have caused stress but should not have had a financial impact unless the delay made the problem worse. A similar trend occurred in relation to home or motor repairs where the full cost of repairs was included by consumers even if the reason for detriment did not appear to match costs directly. Likewise, broadband, telephone or postage costs were sometimes seemingly recorded at the additional costs tab in Q15. This is despite them appearing to relate to the product cost specifically rather than any attempts to rectify it, as the question was intended to capture.

As was highlighted earlier in the report, detriment itself is also experienced subjectively with asymmetrical consequences. While the questionnaire was deliberately worded to minimise the opportunity to record detriment that related specifically to inflation, a small number of consumers still entered issues related to this. While almost all consumers are likely to have experienced inflation in some form or other, it is clear from the responses of the group entering these issues that it had a large impact on their lives and at a minimum caused them stress. Others pointed to financial hardship experienced through inflation, including (in at least 2 cases) losing homes due to rent increases.

Appendix F: Number of markets engaged with and detriment

As noted in table 3, controlling for the variety of engagement by consumers informs the discussion on the association between individual characteristics and the probability of suffering detriment. Extending this, Figure A illustrates the relationship between the number of product categories purchased and the probability of experiencing detriment. The positive relationship implies that the probability of experiencing detriment is less than 20% for consumer that reported purchasing just one good or services in the past 12 months compared with 70% for those who purchased products across all 56 product categories. Previous studies suggest that the positive association between the number of products purchased, and the increased probability of suffering detriment, may be linked with consumers moving outside of their comfort zone and purchasing in a wider array of markets where they are less familiar. Furthermore, it is possible that consumers who buy fewer products are less likely to put themselves in a position to experience detriment as they limit their purchases to essential items and or more trusted providers.

Figure A: Relationship between the variety of purchases and the probability of suffering detriment



Notes: Output is based on a logistic regression model that controls for age, gender, region, education, income, number of product categories purchased and method of survey respondent.

95% confidence intervals are illustrated with dotted lines while the overall mean detriment rate (39%) is signified with the dashed horizontal line.

Appendix G: Categories of Sectors

FMCG	Home products and tools	Vehicles	Clothing and PPE	Child and Baby	Vehicle Maintenance	Holiday and travel	Transport	Medical services	Banking and Insurance	Gambling	Education and Childcare	Apps and digital subscriptions	Telecoms	Domestic Services	TV	Utilities	Entertainment	Professional services
Food and drink, including alcohol, for consumption at home (not takeaways)	Cleaning or maintenance items and tools for the home or garden	New cars or other new vehicles	Clothing, footwear and fashion accessories	Infant or baby products	Fuel, accessories, and maintenance equipment for vehicles	Ticket(s) for airline or ferry services	Vehicle rental services	Private medical services and dental services	Current accounts and deposits	Cryptocurrency	Private and higher education fees and services	Streaming TV or other digital subscriptions (music, gaming, literature, newspapers etc.)	Mobile telephone services and data plans	Home and garden maintenance and repair services	Satellite or cable TV	Electricity and gas services	Cafés, fast-food, restaurants and take-away services, bars, pubs and night clubs	Hair, beauty, and wellness services
Toiletries, cosmetics and hair products	Furniture and furnishings	Used cars or other second-hand vehicles	Protective clothing and equipment	Children's toys	Vehicle maintenance and repair services	Hotels and holiday accommodation	Ticket(s) for publicly operated transport	Prescription and non-prescription medicines	Credit/lending services	Gambling services	Private childcare services	In-app or in-game purchases	Internet/broadband provision services (excluding mobile phone data plans)	Waste collection services			Sport, cultural and entertainment activities, memberships or events	Legal, financial advice, and accountancy services
Supplements and herbal remedies	Domestic appliances (electrical and gas) and fixtures		Personal protective equipment (PPE) (including face masks)			Package holidays and tours	Ticket(s) for privately operated transport	Private carers, nursing homes and other adult care services	Pension funds and investment services	Lottery services			Landline telephone services					Real estate purchases and related services
	Electronic devices and software, including computers, beauty appliance, phones, media devices							Medical devices and equipment	Insurance services									Renting a home and associated services
	Sporting and hobby equipment including musical instruments							Glasses (spectacles) and lenses	Health insurance									Removal and storage services
	Antiques and collectibles							Veterinary services										

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