



Coimisiún um  
Iomaíocht agus  
Cosaint Tomhaltóirí

Competition and  
Consumer Protection  
Commission



**Annual  
Report 2024**



Competition and Consumer  
Protection Commission

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# Chairperson's Introduction, Brian McHugh



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2024 was my first full year as Chairperson of the Competition and Consumer Protection Commission (CCPC), and I'm very proud to be leading a team that works tirelessly to keep Irish markets open and competitive, and champions consumer rights.

Open and fair markets have been the foundation for the success of the Irish economy. They have brought many companies and jobs but also had a huge impact on consumers. At a time of turmoil and uncertainty, the importance of ensuring competitive markets are in place to serve consumer welfare is more important than ever – both in Ireland and in Europe.

That's why we used our merger powers to block the sale of a car park near Dublin Airport to daa. Had the sale gone ahead, daa would have controlled 90% of the market; now, another car park can compete for consumers and provide a choice when parking at the airport.

It was a busy year for merger review in Ireland; notifications to the CCPC increased by 21%. Despite this increase in volume, 71% of merger determinations were made under our Simplified Merger Notification Procedure, up from 50% in the previous year. Our average merger review time has continued to decrease, providing speedier decisions for business and enabling us to focus our resources on those mergers which have the potential to raise competition concerns.

We met a significant milestone this year when we created a new Adjudication Unit as part of establishing a landmark administrative enforcement regime in Ireland for breaches of EU and Irish competition law. The law gives CCPC the power, through independent adjudication officers and subject to court approval, to make decisions concerning alleged infringements of competition law and to impose administrative financial sanctions of up to €10 million or 10% of total worldwide turnover. We will consult on the policies and procedures of this new regime in 2025.

Our work to protect Irish consumers from breaches of consumer

protection law continued apace. In 2024, we conducted more than 200 inspections and issued 47 fixed penalty notices and 23 compliance notices. We took five successful prosecutions. In June, Tesco pleaded guilty to two sample counts of failing to comply with the law in how they displayed the price of products offered on promotion to Clubcard holders. It was ordered to pay the legal costs of the CCPC and a donation of €1,000 to charity. The outcome demonstrates why we argue strongly for increased powers to enforce consumer protection law, including the ability to impose financial sanctions.

Our market surveillance teams were also hard at work, removing or preventing over 178,000 unsafe products from reaching the Irish market in 2024 and, thanks to a dedicated CCPC campaign alerting the public to a faulty part, more than 1,700 households now have safe gas hobs in their kitchens.

We continue to inform and empower consumers to pursue their own consumer rights and financial wellbeing. This year saw 1.8 million visits to our website, over 44,000 calls to our helpline and 2.7 million views for our sponsored consumer rights RTÉ show, The Complaints Bureau.

We aim to be the leading voice in promoting open and competitive markets and representing the interests of consumers. The CCPC consumer detriment report, released in February, found that 39% of Irish consumers experienced an issue that either cost them money or time or caused them stress in the previous year, while the total monetary value of consumer detriment is estimated to be almost €1 billion.

We also celebrated the 10th anniversary of the CCPC in November 2024. We were joined by many staff who have worked hard to build the CCPC into what it is today. It was a moment to reflect on the last 10 years, the importance of the work we do and the impact we have on Irish consumers' daily lives. We now look forward to furthering our success in promoting competition and enhancing consumer welfare.







# Highlights

**21%**  
increase  
in merger  
notifications

**71%** of merger  
determinations  
made under the  
Simplified Merger  
Notification  
Procedure

*up from 50%  
in previous  
year*

## 1

Strategic Goal 1

## Enforcement and Compliance

- The CCPC blocked daa's proposed purchase of the former QuickPark car park at Dublin Airport
- The CCPC opened five investigations for suspected breaches of competition law; two cases related to abuse of a dominant position, two to cartel-related activity and one to a potential case of merger gun-jumping
- Five successful prosecutions taken in the courts for breaches of consumer protection law
- Unannounced searches (dawn raids) were carried out under District Court search warrants at two premises as part of a separate ongoing cartel-related investigation that was opened in 2023
- CCPC officers assisted the Italian competition authority with an unannounced search of Ryanair's headquarters in Dublin
- 21% increase in merger notifications, 71% of determinations made under the Simplified Merger Notification Procedure (up from 50% in previous year)
- Trial date set in the Central Criminal Court for the first group of five transport operators suspected of bid rigging in publicly-funded school transport services
- Investigation opened into Ticketmaster Ireland and its handling of the sale of Oasis tickets in August 2024
- The CCPC participated in two EU-coordinated compliance sweeps of online traders selling goods such as clothes, accessories and electronic equipment
- 178,596 unsafe products were recalled, withdrawn or prevented from reaching the Irish market.
- CCPC conducted 205 consumer protection inspections and issued 23 compliance notices and 47 fixed payment notices
- Over 1,700 consumers now have safe gas hobs, thanks to ongoing monitoring and communications work by CCPC



## 2 Strategic Goal 2 Empower and Inform

- 44,247 consumers contacted the CCPC helpline—an increase of 13%. Issues with cars were the biggest call driver, and consumers reported having spent an average of €6,013 on the goods or services they had contacted the helpline about
- The CCPC website offers comprehensive information on consumer rights, helpful information for businesses and personal finance products and services. In 2024, it received 1,835,011 visits
- The CCPC Money Tools received 740,789 visits, with the mortgage comparisons tool proving the most popular
- The CCPC sponsored a new consumer TV series on RTÉ, The Complaints Bureau. The eight-episode series investigated consumer complaints and attracted over 2.7 million views, with an average of 343,750 views per episode (31% audience share)
- CCPC social media account followers reached 57,000, an increase of 7%. The team won three “Sockies” Social Media Awards

## 3 Strategic Goal 3 Advocacy and Research

- CCPC research found that 39% of Irish consumers experienced an issue that either cost them money or time or caused them stress in the previous year, while the total monetary value of consumer detriment is estimated to be almost €1 billion
- In 2024, the CCPC featured in 6,176 media pieces across print, broadcast (TV and radio), and online. The total value of this coverage was €25,106,070
- CCPC recommendations reflected in the National Competitiveness and Productivity Council “Ireland’s Competitiveness Challenge” report and the National Payments Strategy
- A call on Government to set a timetable for legal reform, by chairperson Brian McHugh, received widespread media coverage, including an opinion editorial in the Business Post
- CCPC research laid bare the back-to-school costs for Irish families
- CCPC-funded research by Indecon informed the development of the National Financial Literacy Strategy
- CCPC issued advice to consumers as survey found that one in five (21%) have made no financial arrangements at all for their retirement





# Highlights

## 4 Strategic Goal 4 Structure and Resource

- The CCPC created a three-year People Strategy in 2024 with three goals: for the CCPC to be an 'Employer of Choice'; to develop and build on the capacity, expertise, leadership and management capabilities of the staff; to create an engaged and empowered workplace
- The CCPC recruited 65 members of staff in 2024 and received sanction for 35 additional roles in 2024. By the end of the year there were a total of 261 approved posts.

This was an increase of 16% from 2023. The CCPC's staff turnover rate is 10.77%, against a national average of 11.5%, as reported by the Central Statistics Office

- Five new divisions have been formed to take account of our evolving mandate and a number of new units created including Competition Adjudication, Digital Markets and Platforms, Data Regulation, Surveillance and Digital Solutions (ICT)

# Strategic Goal 1

## Enforcement and Compliance

**AMBITION:** To ensure that consumers can trust that markets are working in their interests

### MEASURES:

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



### New powers and responsibilities

#### General Product Safety Regulation

The product safety powers of the CCPC were expanded when the EU General Product Safety Regulation (GPSR) became law in December 2024. The new legislation sets out specific obligations on online marketplace providers and empowers the CCPC to issue removal orders against online marketplaces selling dangerous products.

#### Digital Services Act

The CCPC was designated as a competent authority for obligations under the EU Digital Services Act (DSA), which took effect in 2024. The DSA regulates intermediary service providers, including online platforms such as marketplaces, and aims to ensure users' safety. The CCPC has specific responsibility for Articles 30 to 32. These three Articles set out

requirements for online marketplaces (excluding micro and small enterprises), such as the requirement to obtain and display traders' details, the requirement to design their interface in a way that allows traders to provide legally required information, and the requirement to take action when the marketplace becomes aware it has sold illegal products or services. The CCPC is responsible for online marketplaces that have their main EU headquarters in Ireland. To meet its responsibilities under the DSA, the CCPC established a new Digital Markets and Platforms Unit in 2024 and began work to impose a levy on relevant consumer online marketplaces to fund its activities as a competent authority.

#### Digital Governance Act

The CCPC was given new powers to

enforce the EU Data Governance Act (DGA) Regulations on 23 December 2024. The EU DGA aims to increase trust in data by setting out certain basic requirements for what is known as data governance. The Act creates a harmonised framework to better facilitate data sharing and innovation by companies, individuals and the public sector, across all sectors and EU Member States.

#### Data Act

The Data Act will be a key piece of legislation in the EU's Data Strategy. The CCPC will be the competent authority and Data Co-ordinator for Ireland, and it will apply from 12 September 2025. In 2024, the CCPC has been preparing to take this role on in 2025.



### Consultation on Settlement Procedures as introduced by the Competition (Amendment) Act 2022

In summer 2024, the CCPC opened a public consultation on a proposed procedure for agreeing settlements in competition law investigations. The Competition (Amendment) Act 2022, which came into operation in 2023, expanded the CCPC's power to enforce EU and Irish competition law and introduced several changes to how competition law is enforced in Ireland. This included empowering the CCPC – through independent

adjudication officers – to fine businesses who are found to have breached competition law. The Settlement Procedure outlines the CCPC's proposed approach to entering into discussions and agreeing a settlement with parties under investigation for a suspected breach of competition law. The new Settlement Procedures will be published in 2025.

### New Data Regulation Unit

The CCPC also established a dedicated Data Regulation Unit to

meet our new responsibilities in the area of data regulation. It engaged with the growing network of EU competent authorities and other members of the European Data Innovation Board (EDIB), which oversees the implementation of the Data Governance Act (DGA) and Data Act. The Unit also co-chaired a dedicated competent authority subgroup looking at how implementation of the DGA can be made consistent across Europe.

The Irish Times

## Home alarm companies targeted in dawn raids by competition watchdog and Gardai

Move part of an ongoing criminal investigation into potential breaches of competition law



Source: The Irish Times, 27 February 2024

## Using our competition and consumer law enforcement and compliance powers

### Two investigations opened into suspected breaches of competition law (abuse of a dominant position)

The CCPC announced two formal investigations into suspected breaches of competition law (abuse of dominant position) in 2024. The first investigation related to healthcare software company (Clanwilliam) and the provision of Electronic Patient Record (EPR) software and related services such as electronic referrals and text messaging services. The second investigation related to Dublin Port Company and the provision of port infrastructure at Dublin Port and/or the provision of port towage services at Dublin Port.

### Two investigations opened into cartel-related activity and one into a case of potential gun jumping

Two investigations were opened into suspected breaches of competition law (cartel-related activity) and one related to suspected gun jumping.

The CCPC also carried out unannounced searches (often referred to as dawn raids) at two premises under District Court search warrants, as part of a separate on-going investigation (opened in 2023) into potential breaches of competition law. Authorised Officers from the CCPC were supported by colleagues from the Garda

National Economic Crime Bureau and An Garda Síochána.

Requirements for Information (RFIs) were also issued against three undertakings.

The prosecution for suspected bid-rigging in school transport services, involving 13 public transport operators, continued to progress in the Central Criminal Court, with the CCPC assisting the Director of Public Prosecutions (DPP) with case management throughout 2024. The CCPC awaits a trial date for 2025.

### Dublin and District Schoolboys'/Girls' League (DDSL)

In 2024, the CCPC engaged with the Dublin and District Schoolboys'/Girls' League (DDSL) regarding its requirement for all players to purchase an insurance policy of DDSL's choosing. The CCPC found that while the insurance requirements did not inherently raise competition concerns, procedural changes were recommended (and subsequently accepted by DDSL) to ensure that the DDSL's processes were transparent and compliant with competition law.

### An Post

In January 2024, the CCPC concluded an engagement with An Post, the state-owned provider of postal services in Ireland, in relation to the sale and top-up of Leap Cards in retail outlets. Leap Cards are pre-paid travel cards which allow passengers to pay fees on public transport services. On the basis of the information available to it, and bearing in mind that An Post accepted the CCPC's recommendations, the CCPC completed its assessment and decided to not open an investigation.

## Establish new Surveillance Unit

Part 5 of the Competition (Amendment) Act 2022, introduced amendments to the Criminal Justice (Surveillance) Act 2009, giving the

CCPC surveillance powers in relation to relevant competition offences. Following a successful recruitment campaign, a Head of Surveillance has

been appointed and recruitment to build the team further will begin in 2025.

## Establish a Competition Adjudication Unit

The Competition (Amendment) Act 2022 gives the CCPC powers to impose non-criminal financial sanctions for breaches of Irish and EU competition law, subject to court

confirmation, through independent adjudication officers. In 2024, the CCPC continued to implement the Act, establishing a dedicated competition adjudication unit and

working to progress the appointment of a Chief Adjudication Officer and Adjudication Officers.

## Embedding and deploying enforcement

### Consumer Protection

#### – Inspections

CCPC officers perform regular unannounced inspections of retailers nationwide to ensure compliance with consumer protection law. In 2024, we inspected 205 businesses, including 41 online. This was an increase of 12% on the previous year. We took action against 37% of the traders we inspected.

### Consumer Protection

#### – Consumer Protection List

A full, detailed list of enforcement outcomes, the CCPC Consumer Protection List, is available on the CCPC website. In 2024, we took 75 enforcement actions, including five court cases, 47 Fixed Payment Notices and 23 Compliance Notices.

The CCPC took five successful prosecutions in 2024:

- Tesco Ireland Limited trading as Tesco Metro, Jervis Shopping Centre, for failure to include unit pricing on Tesco Clubcard promotional shelf-edge labels

### Irish Independent

## Tesco Ireland pleads guilty to Clubcard pricing breaches

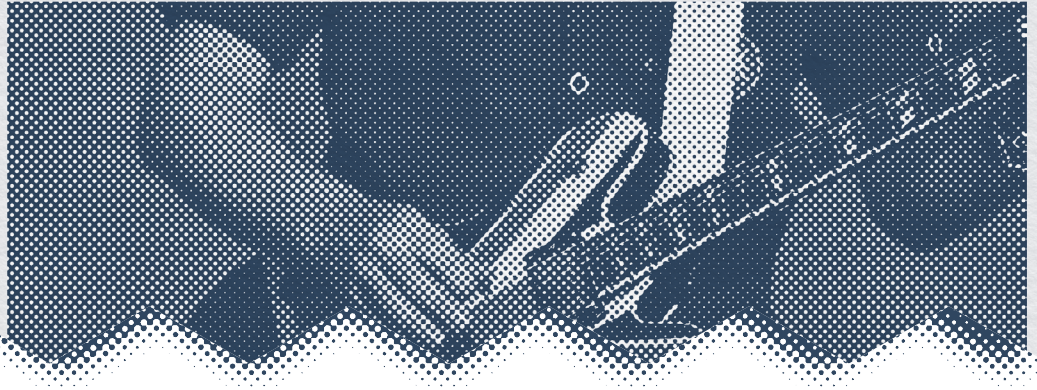


Source: Irish Independent, 24 June 2024



## Hot Press

## Nearly 100 complaints made to CCPC over Oasis dynamic pricing



Source: Hot Press, 4 October 2024

- Centz Stores 5 Limited trading as Homesavers, for failure to include the final price in euro of a product
- Mr Andrius Miliauskas trading as Newcastle Motors, for failing to disclose at the time of transaction that a vehicle he sold to a consumer had previously been crashed
- Mr Patrick Doyle acting as a salesperson for Felix Byrne, sole trader, trading as Tinnock Motors, business commonly known as Byrnes Garage, for failing to disclose at the time of transaction that a vehicle he sold to a consumer had previously been crashed

- Greenhill Motors Limited, for misleading or deceiving a consumer in relation to the risks presented by mechanical deficiencies relating to a vehicle sold to them by Greenhill Motors Limited

### Fixed Payment Notices

47 Fixed Payment Notices (FPNs) were served on 27 traders, for the following issues:

- Failing to indicate the selling price of a product: 35 FPNs
- Failing to display a notice specifying the kind and selling price of beverages in licenced premises: eight FPNs

- Failing to indicate the unit price of a product: one FPN

### Compliance Notices

23 Compliance Notices were served on 19 traders in 2024. For the first time, the CCPC took action against influencers who failed to disclose the commercial nature of their social media posts.

### Ticketmaster

In September 2024, the CCPC opened an investigation into Ticketmaster Ireland and its handling of the sale of Oasis tickets on the weekend of 31 August 2024. This follows a review of more than 100 complaints received by the CCPC helpline.

## The Journal

## Nicki Minaj fans calling for refunds after 'disgraceful' Malahide Castle concert set

Minaj was an hour and a half late beginning her set and performed for under an hour.



Source: The Journal, 8 July 2024



### Early interventions to liquidators

In rapid response to intelligence gathered through proactive online monitoring in 2024, the CCPC alerted consumers to their rights regarding companies that were going into administration. In the case of the Wild Roots Festival, the CCPC conducted a formal investigation and issued a compliance notice directing organisers to refund consumers. There was early engagement with liquidators overseeing the administration of Carpetright Ltd, Homebase, and DK Windows and Doors Ltd. In the case of Homebase, as part of the CCPC engagement with the liquidator, it was agreed to honour consumer orders or provide a refund where this was not possible. Vouchers also continued to be accepted.

### Limerick Live

## Festival-goers urged to get refunds after shock cancellation of Wild Roots 2024



Wild Roots 2024 was cancelled with just a week to go

Source: Limerick Live, 31 May 2024

## Regulation

### Credit intermediaries

As part of the CCPC's credit intermediary responsibilities, 1,013 credit intermediary authorisations were issued in 2024. The CCPC also issued three licences for pawnbrokers.

## Working with the European Commission, other Member State authorities and other international partners

### Competition

In 2024, the CCPC provided assistance to national competition authorities of other Member States in accordance with Article 22 of the Council Regulation (EC) No1/2023. These provisions provide that a competition authority of one Member State can request the competition authority of another Member State to carry out an inspection or other fact-finding measure on its territory on behalf of and for the account of the competition authority making the request.

In March 2024, CCPC staff assisted the Italian competition authority with an unannounced inspection of Ryanair's headquarters in Dublin.

In November 2024, the CCPC assisted the Spanish competition authority with an ongoing Spanish investigation by issuing a request for information to an app developer based in Ireland.

In 2024, the CCPC assisted the Lithuanian competition authority with an ongoing investigation by issuing a request for information to an undertaking in Ireland.

### Consumer Protection activity

The CCPC is a member of the EU Consumer Protection Cooperation (CPC) Network. As members of the network, national consumer authorities work together to investigate and take action to tackle widespread infringements of EU consumer law and review commercial practices of traders. In 2024, the CCPC agreed to co-lead on CPC Network coordinated actions launched on Temu, Shein and Apple..

In 2024, the CCPC also participated in two sweeps as part of the CPC Network. One sweep of 356 traders, selling goods such as clothes, accessories and electronic equipment, conducted by the consumer authorities of 25 member states, Iceland and Norway, found

that more than half were potentially breaking consumer law, for example by not correctly informing consumers about their right to return faulty goods or goods that did not look or work as advertised.

A smaller sweep of 104 websites, found that most traders provided mandatory contact information to consumers meaning that consumers know who they can contact if they have a problem.

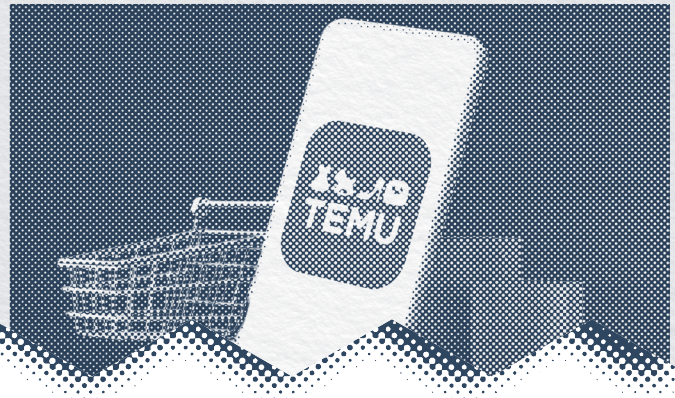
In 2024, as an outcome of a previous sweep, Rentalcars.com, a third-party car rental website used by Ryanair Car Hire and Booking.com, removed misleading information, relating to insurance, from its websites and made other changes to ensure that consumers were provided with clear and accurate information to help them make informed decisions.



## Irish Independent

### Irish consumer protection authority launches probe into Temu

Chinese online retail giant Temu has been given one month to respond with proposals to address potential consumer protection issues identified in an investigation by agencies in Ireland, Belgium and Germany.



Source: Irish Independent, 8 November 2024

#### Requests for support from other member states

The CCPC is designated as a competent authority under the EU Consumer Protection Cooperation (CPC) Regulation. The CPC Regulation allows member states to make a request for enforcement or request for information to other member

states to address cross-border breaches of consumer protection law. In 2024, the CCPC received five requests to take enforcement measures on traders based in Ireland, sent one enforcement request to another member state, and received seven requests for information.

Alerts are also issued under the CPC Regulation where there is a reasonable suspicion that a suspected breach of consumer law is affecting consumers' interests in another member state. In 2024, the CCPC received 21 such alerts from other member states and issued two.

## Conducting market surveillance and inspections, and working with Customs

#### Safety Gate

The CCPC investigated 129 notifications from Ireland and across Europe on unsafe products. This resulted in the withdrawal or recall of 151,404 products from the Irish market. In our role as the National Contact Point in Ireland for Safety Gate, which is the EU's rapid alert system for dangerous non-food consumer goods, we trained and advised 18 market surveillance authorities (MSAs) in Ireland to follow up on serious risk products across Europe that impact Irish consumers.

#### Proactive inspections and investigations

The CCPC inspected 312 traders, 1,049 products and sent 47 products which were on the Irish market, for laboratory testing including electric plug-in heaters, baby soothers, infant highchairs, children's activity toys, and outdoor lighting chains.

As a result of this proactive work, 25,102 unsafe products were recalled and withdrawn from the Irish market, including 7,356 baby soother holders.

We continued the enforcement of our previous hurling helmet investigation by removing 320 pages from online marketplaces selling dangerous Gola hurling helmets.

#### Product safety complaints

Following complaints and referrals, the CCPC opened 107 investigations, 50 of which resulted in a product recall, withdrawal or removal of online listing. These included 2,412 dangerous button battery toys, 15,000 claw machine toys and 51 rechargeable battery chargers.

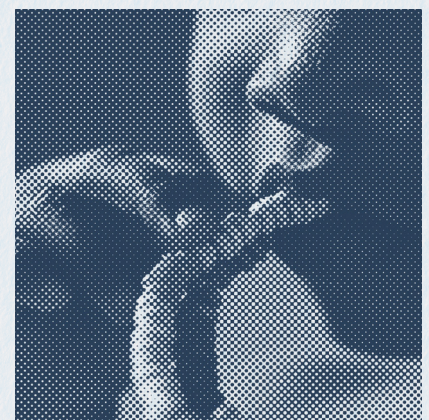
#### Customs

Working in cooperation with Revenue Customs the CCPC inspected 81 consignments and issued 18 enforcement notices on importers attempting to bring non-compliant products into Ireland.

The CCPC delivered six workshops to over 90 Revenue Customs officers at Dublin Airport and Dublin Port on product safety as part of our cooperation with Customs and their officers to prevent unsafe products making their way to Irish consumers.

## Irish Examiner

### Teething jewellery joins watchdog ban list



Popular among parents, teething jewellery such as amber necklaces have joined a growing list of banned products

Source: Irish Examiner, 7 June 2024

## Delivering an effective merger enforcement regime

In 2024, the CCPC received 82 merger notifications. This is an increase of 20.6% from the number of mergers which were notified in 2023. The CCPC issued 77 determinations including seven in relation to cases carried over from 2023.

In 2024, 55 determinations (approximately 71%) were made under the CCPC's Simplified Merger Notification Procedure (SMNP) and these mergers were cleared within 13.3 days of notification, on average. By comparison, in 2023, we reported that 33 determinations (50%) were issued under the SMNP. One further merger notified in 2023 and carried

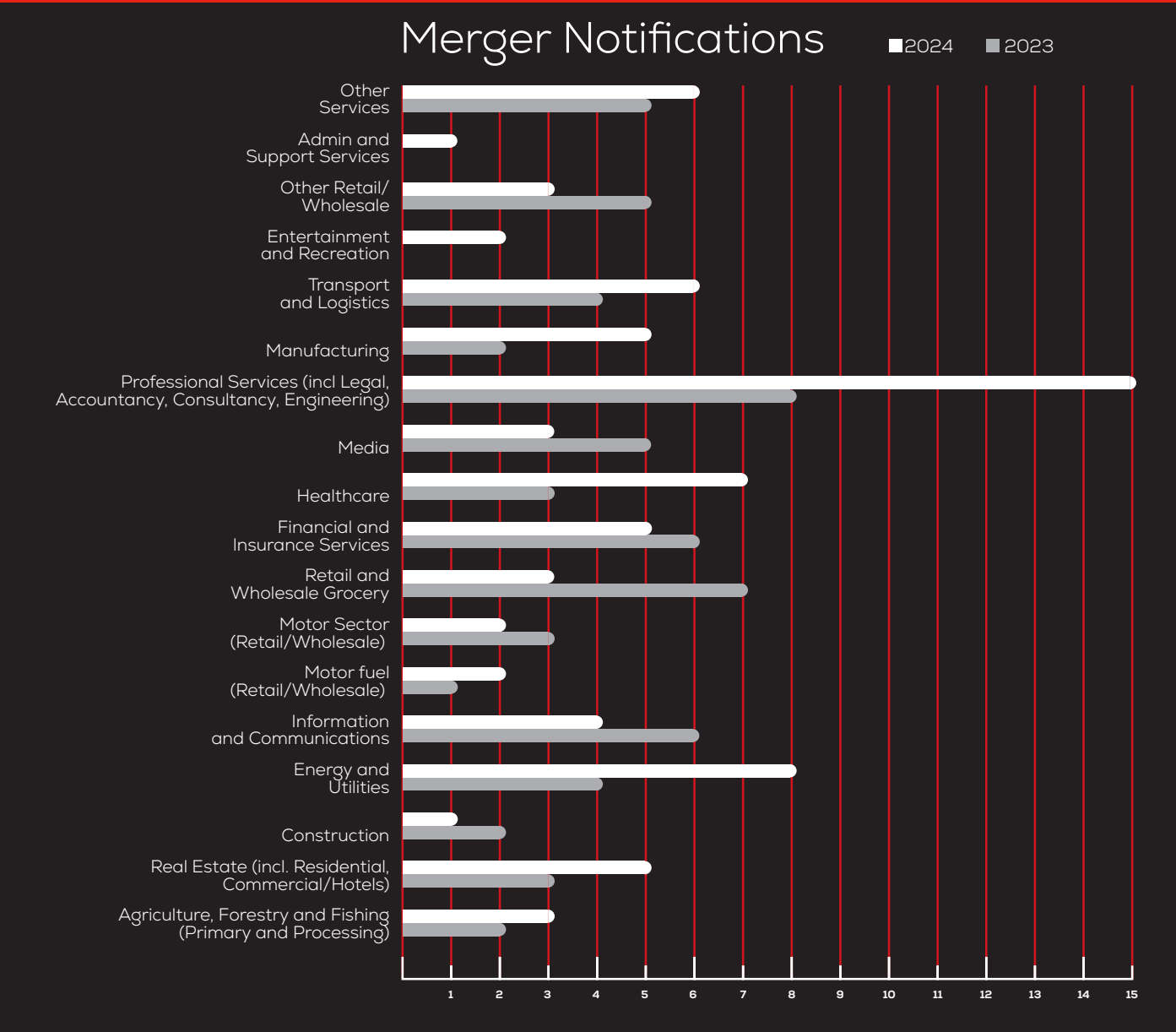
over to 2024 was declared invalid by the CCPC in 2024 under Section 18(12) of the Competition Act 2002.

Three media mergers were notified to the CCPC in 2024 compared to five in 2023.

The average number of working days to reach a Phase 1 determination in non-extended cases was 16.3, which represents a decrease on 2023 (18.7 working days) – this decrease was largely driven by a significant increase in the proportion of mergers notified under the CCPC's SMNP.

Eleven notifications required an extended Phase 1 investigation (meaning the CCPC issued a requirement for further information to one or more parties involved in the merger which stopped and re-started the merger review 'clock').

The CCPC progressed eight Phase 2 investigations during the course of 2024. Of these, three were cleared unconditionally without an Assessment being issued, one was cleared with remedies and without an Assessment being issued, one was prohibited and three were carried over to 2025 (one following the issuing of an Assessment).





Case study:

# daa Carpark Block

In March 2024, the CCPC blocked daa's proposed purchase of the site of the former QuickPark car park at Dublin Airport. The CCPC's investigation found that the deal would have substantially lessened competition in car parking serving Dublin Airport, as daa would own over 90% of the public car parking spaces if the purchase went ahead. In the CCPC's view, this would have harmful consequences for consumers, including potentially higher prices. Ireland's merger regime ensures that mergers will be approved only where they would not substantially lessen competition. Where that is not the case, and where there are no appropriate options available to remedy the competition concerns, the CCPC will prohibit the merger. Our goal is to ensure that competition is protected to the benefit of consumers.



## The Irish Times

### Competition watchdog open to short-term lease on former Quick Park site at Dublin Airport



Airport operator daa signals that State-owned company is no longer looking at that option

Source: The Irish Times, 3 July 2024

## The Journal



### Dublin Airport seeking to operate the same private car park it tried to buy after bid blocked

The daa bosses said some passengers should consider taking alternative transports methods this summer.

Source: The Journal, 1 May 2024



## Enhancing our engagement with the business community to drive compliance

### Events

The Marketing and Outreach team attended the Retail Excellence Ireland (REI) Retail Retreat in May 2024 and followed up with two webinars for REI members on the topics of Selling to Consumers and Pricing Regulations.

CCPC held a webinar for Enterprise Ireland/Local Enterprise Office Network staff and articles by CCPC staff on bid-rigging

and cartels were carried by the PAI Review and eolas magazine.

CCPC hosted a stand at the National Ploughing Championships 2024 in Ratheniska, Co. Laois as part of the Government of Ireland Village and were pleased to welcome Minister Peter Burke.

### Gas hobs

As a result of CCPC's continued dedicated monitoring of manufacturer's repair programmes and two additional communication campaigns to further alert consumers, over 1,700 consumers now have safe gas hobs. This followed a campaign in 2023, when the CCPC worked with manufacturers of gas hobs to comply with safety regulations.

### EU Commission General Product Safety Workshop

The CCPC hosted the EU Commission's product safety team to deliver a joint workshop to businesses interested in understanding more about their obligations under the new General Product Safety Regulation.





**Merger Guidelines consultation**

In autumn 2024, the CCPC opened a public consultation on the proposed adoption of revised Guidelines for Merger Analysis. The Guidelines cover each of the areas of analysis the CCPC may undertake in order to establish whether or not a merger

will lead to a substantial lessening of competition in any market for goods or services in the State.

**Mergers breakfast**

In December 2024, the CCPC held its annual Mergers Breakfast stakeholder briefing, where

the mergers division presented key statistics from 2024, and highlighted major determinations. The presentation was followed by a panel discussion and opportunity for discussion.

**The Irish Times**

## Big businesses should face bigger fines for consumer protection breaches, watchdog says

Competition commission warns pub owners to display prices or face penalties



Source: The Irish Times, 25 April 2024

**Vintners correspondence**

In April 2024, the CCPC wrote to the Vintners' Federation of Ireland and the Licensed Vintners Association asking them to remind pub owners nationwide to obey price display laws. This came after 13 fixed penalty notices were issued to nine traders in Dublin and Kildare for breaches of the Retail Price (Beverages in Licensed Premises) Display Order and ahead of further inspections. The letter received widespread media attention.

**Raising awareness of bid-rigging and whistleblowing**

Presentations regarding bid-rigging and whistleblowing were given to: Irish Rail, Donegal and Dublin County Councils and the Office of Government Procurement Procurers Network in Limerick Local Authority. Information promoting the CCPC anonymous whistleblowing platform was also disseminated at these events. Commission Member, Úna Butler, gave a presentation about bid-rigging as part of the CCPC-sponsored Procurement Masterclass at Public Affairs Ireland.

**Consumer Contacts and Compliance Screenings**

The CCPC screened 2,871 contacts received via the helpline for possible infringements of consumer protection law. As a result of screening, 224 traders were placed on a watchlist for further supervision, 56 were issued with early engagement letters, and 73 traders were referred to our consumer enforcement division for further investigation.

**Early engagement letters to protect consumers**

Following screening of calls to the CCPC helpline, 56 early engagement letters were sent to traders ranging from sole and online traders to department stores and international retailers. The letters addressed potential breaches of consumer protection law, such as misleading price indications, faulty goods, pre-contractual information, refunds and returns policies. As a result of our early engagements, the CCPC achieved voluntary compliance from seven traders. Traders who failed to comply have been flagged for further investigation.

**Institute of Auto Assessors**

CCPC enforcement team delivered a presentation to the Institute of Auto Assessors on consumer protection and enforcement.

# Strategic Goal 2

## Empower and Inform

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

### MEASURES:

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

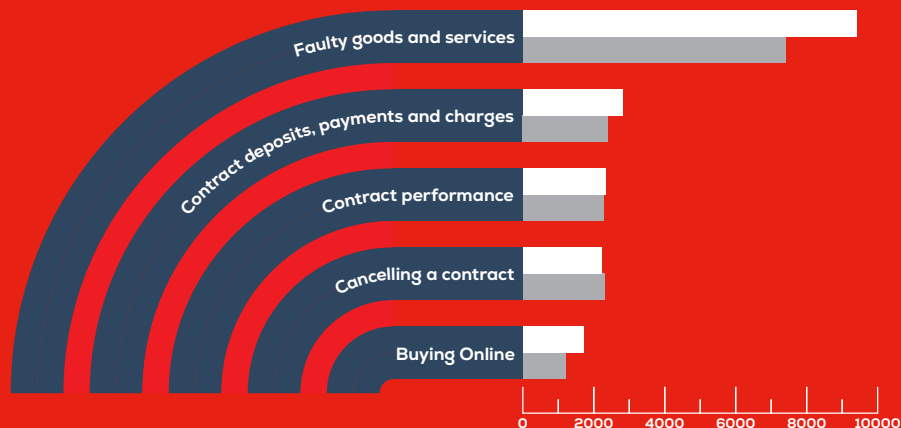
### Increasing consumer engagement with the CCPC

#### Helpline: over 44,000 consumers contacted the CCPC in 2024

The CCPC helpline supports consumers by providing them with information on consumer rights and personal finance products. Calls to the helpline are screened for potential breaches of the law, and intelligence drives our enforcement activity and informs our advocacy.

In 2024, 44,247 consumers contacted the CCPC – over 5,000 more than in 2023, an increase of 13%. Issues with cars were the biggest call driver, with almost 5,500 contacts about vehicles and transport. The consumers who provided information on a purchase reported spending an average of €6,013 on the goods or services they contacted the helpline about.

### Most common consumer queries



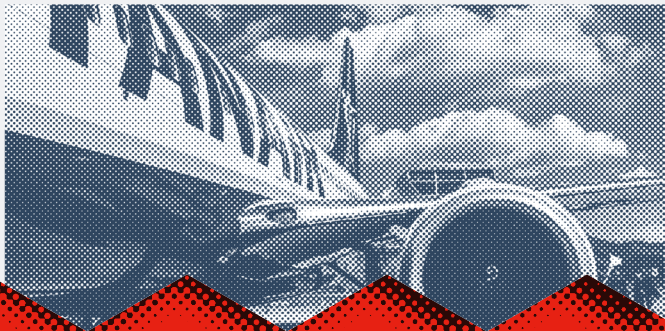
The top five categories of queries from consumers who contacted the CCPC in 2024. These five categories represent 63% of the total contacts received in this period. The number of contacts received in these categories in 2023 is displayed for comparison.

■ 2024  
■ 2023

The Irish Times

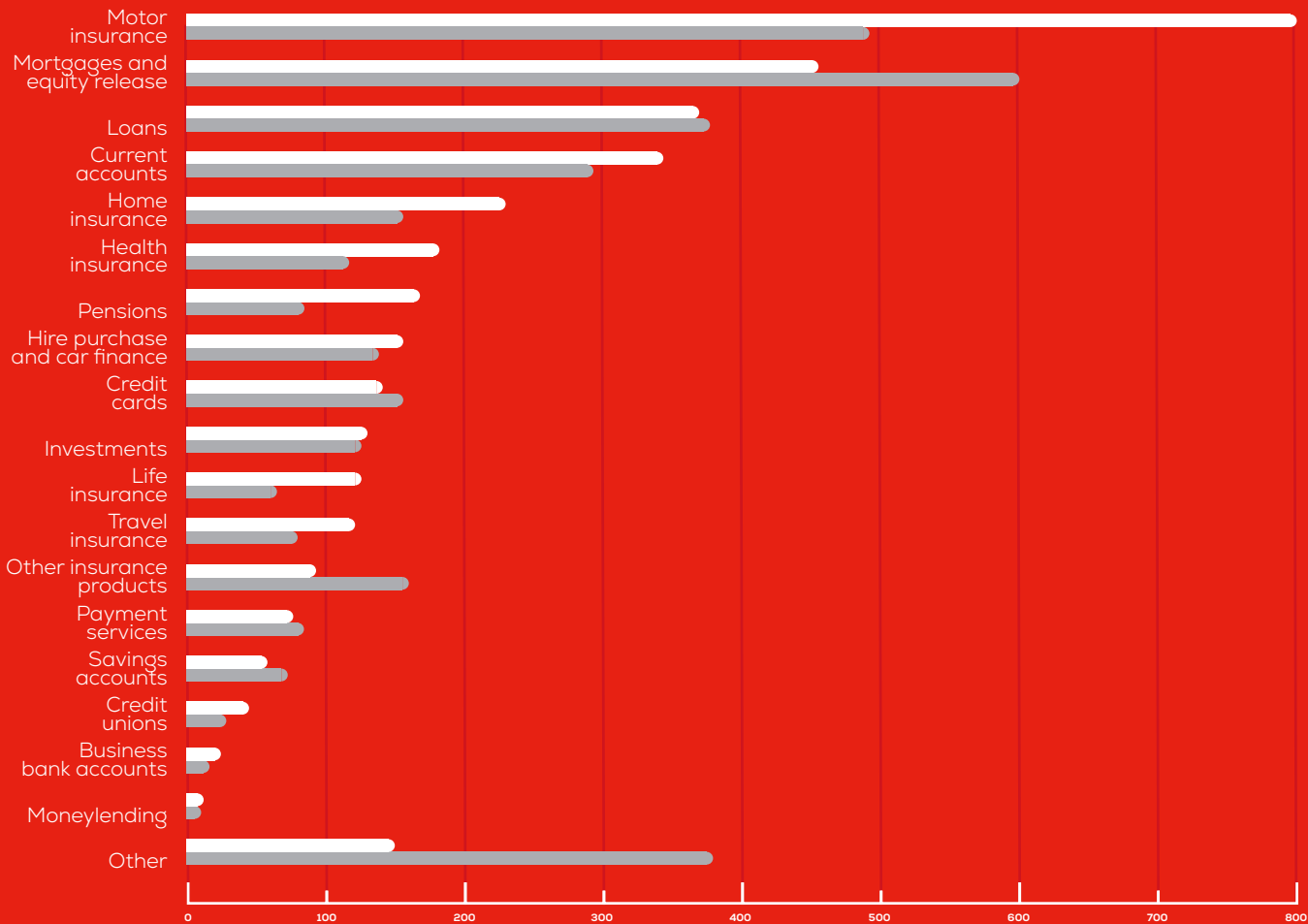
# Eir, Ryanair and Sky most likely to be referenced by callers as consumer complaints rise 18%

Vodafone, Harvey Norman and Currys were also among the top 10



Source: The Irish Times, 14 August 2024

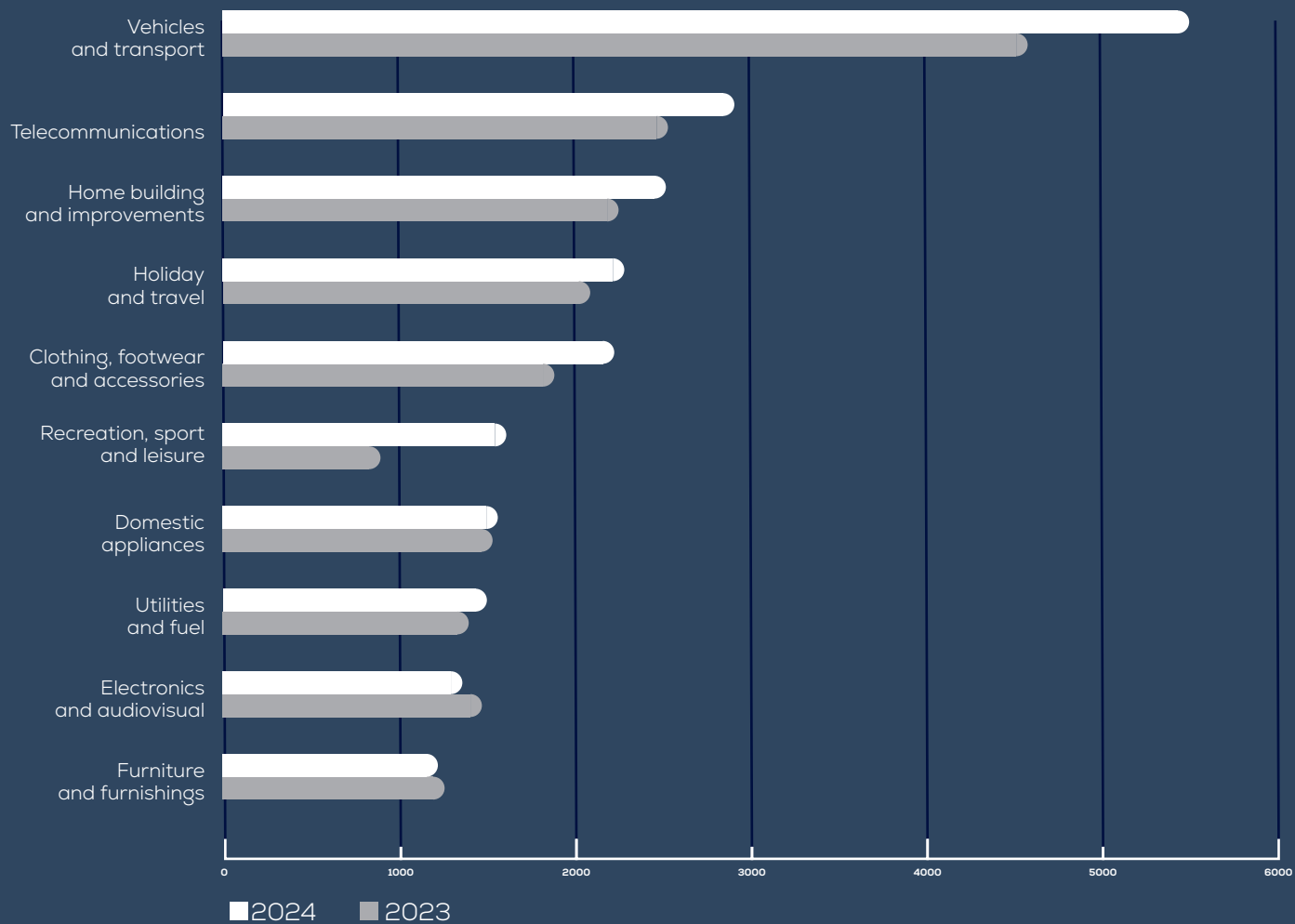
## Personal Finance Queries



Personal finance contacts to the CCPC in 2024 listed by category. The number of contacts received in these categories in 2023 is displayed for comparison.



# Top Ten Business Sectors



**Website**

The CCPC website offers comprehensive information on consumer rights, helpful information for businesses and personal finance products and services. In 2024, we welcomed 1,835,011 visitors.

We offer calculators to help consumers manage their finances more effectively and comparison tools to help consumers pick the best product for them.

The most popular CCPC webpages covered consumer rights and buying a home, as well as personal contract plans, savings and investments.

**Money Tools**

The CCPC Money Tools continue to provide the most popular content for visitors to the website. In 2024, there were 740,789 visits to money tools; the mortgage comparisons tool

was the most popular, driving 37% of traffic. The personal loan comparison tool garnered over 92,000 views. In 2024, there were 807 products live on Money Tools, and two new providers joined the site: Raisin Bank with savings accounts and Núa for mortgages. There were 1,830 updates to products from providers which were checked and verified by the CCPC.

**Accessibility**

As a result of work carried out to reformat older site content and PDFs, the CCPC website received an accessibility score of 96.87% from the National Disability Authority 2024 annual monitoring report. This puts CCPC in the 11th place of the 232 sites audited.

**Consumer newsletter**

In 2024, we grew our newsletter subscriber base from 9,596 to

9,961, an increase of 4%. We sent 12 newsletters with an average open rate of 52% and an average click through rate of 8%. They were opened 52,837 times.

**Media Campaigns**

The CCPC carried out 30 national media interviews and 59 regional interviews across a broad range of areas during 2024. We also responded to 321 queries from media outlets and issued 49 press notices.

Activity included 14 consumer media campaigns to highlight information that might help consumers be informed of and secure their rights, better manage their money and keep them safe from faulty products.

## Consumer rights

Campaign	Timescale	Key Message
Two National Helpline Reports / World Consumer Rights Day	March / August	Reminding consumers of consumer protection laws and consumer rights when things go wrong
Price display	April	Promoting consumer rights price displays in the hospitality sector, alongside reminders to pub owners on their responsibilities
Festival cancellation	May	Warnings and advice to consumers regarding refunds following festival cancellation
Travel advice	July	Essential travel advice for consumers on their rights if things go wrong
Black Friday	November	Advice on sales shopping, alongside research showing consumer interest in Black Friday and Cyber Monday had decreased significantly
Consumer right to return	December	Advice for consumers on their rights around returns and unwanted gifts, with research on rights awareness

## Personal Finance

Campaign	Timescale	Key Message
Back to school costs	July	Advice on uniforms, devices and voluntary contributions, with research highlighting some of the hidden costs of education for families
Pensions	September	Call to set up pensions and for employer support to do so, as CCPC research indicated one in five (21%) have made no arrangements
Costlier Christmas	December	Advice on seasonal budgeting and credit choices, alongside research showing anticipated consumer spend

## Product Safety

Campaign	Timescale	Key Message
Amber jewellery	June	Warning parents and caregivers not to use amber jewellery as teething aids for their babies
Gas hobs	April and November	Publicising an urgent safety notice and repair programme regarding certain gas hobs
Halloween	October	Seasonal safety tips for parents and caregivers in relation to children's Halloween costumes and accessories
Button batteries	December	Warning parents and caregivers about the serious risks posed by button batteries in the run-up to Christmas



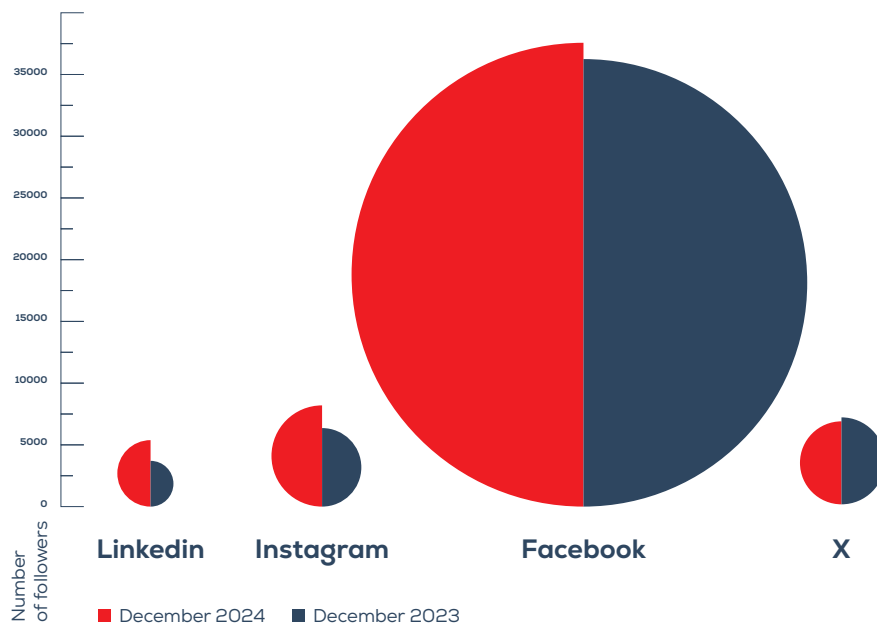
### Consumer column in the Sunday Independent

The CCPC offers valuable information to consumers about their rights and personal finance through a dedicated column in The Sunday Independent, published every two weeks in print and in the digital edition. This column addresses two consumer queries in every edition.

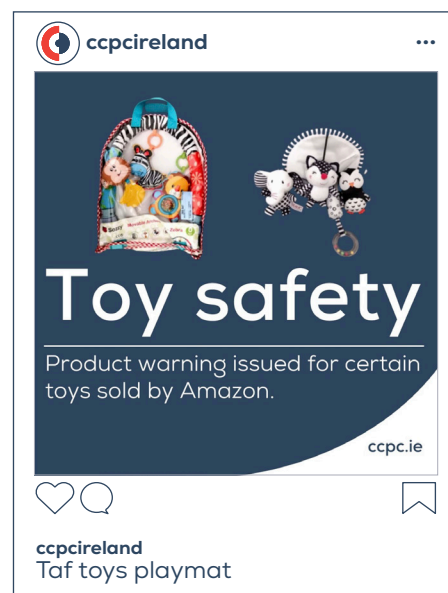
### Social media

The CCPC had 58,656 followers on social media in 2024. This represents an increase of 7% on 2023. Facebook remains the most popular platform, with 37,693 followers. The platforms that achieved the biggest growth of followers were Instagram with 29% and LinkedIn with 40%. Followers on X (formerly Twitter) fell by 30%.

## Comparison of followers

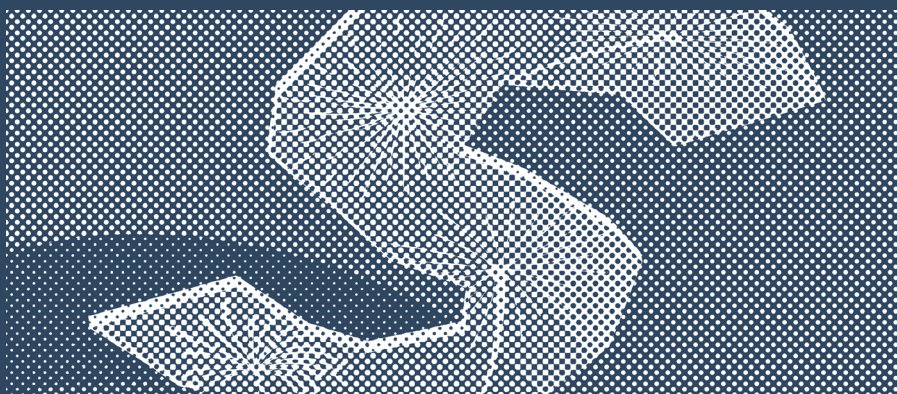


### Most popular social posts



## CCPC scoops three social media awards

The CCPC won three Social Media Awards (also known as the Sockies) in 2024. The team received a silver in the category of 'Best State Body Instagram' account and another silver for the Money Clinic video campaign. The Water Beads product safety campaign received a bronze award.



Consumer awareness campaigns

The CCPC delivered six practical and insightful public awareness campaigns in 2024, informed by market intelligence, consumer research and behavioural economics to protect consumers from unfair practices and unsafe products.

For two of these campaigns – “Car checks” and “Take control of your money” – we worked with media partners, rather than a traditional multi-channel media campaign.

Media Partnerships

**Car checks:** The CCPC teamed up with IrishMirror.ie for a three-month partnership which aimed to educate consumers about what checks to carry out before they buy.

The campaign featured six “Undercover Dealer” videos covering clocked cars, ‘disguised dealers’, consumer rights if experiencing recurring faults, Hire Purchase and Personal Contract Plans. Readers were prompted to take our “Car Savvy Quiz” to test their knowledge to see how ready they are to buy a car. The partnership also featured educational articles, digital display and social content. The partnership delivered 4.7 million impressions and 42,929 page views.

**Take control of your money:** We created a six-week high-impact content partnership with the Irish Independent. The Money Hub section of CCPC’s website houses information about financial products and personal finance issues. Based on market trends and website analytics, the campaign focused on: credit, pensions and promotion of CCPC Money Tools (a selection of financial product comparisons and calculators).

The campaign’s strategic mix of sponsored content, engaging quizzes, targeted display and bespoke videos drove exceptional engagement. The native content, quizzes and videos delivered 904,488 views while the display activity delivered almost 4.8 million impressions.

# Consumer rights

Campaign	Key Objectives
Consumer rights campaign	To inform consumers that they have strong rights if they have a problem with a purchase
Mortgage switching	To encourage mortgage applicants and mortgage holders to use the CCPC's free, independent mortgage comparison Money Tool to compare the different mortgages that are available from the main financial providers
Car checks	Arm consumers with information they should know before they buy a car, eg use CCPC's car buyer's checklist, and understand the different finance options
Take control of your money	To promote the CCPC as a provider of free, independent personal finance information and empower consumers to make positive financial decisions, including on pensions and credit choice
Buy Now Pay Later	To increase consumer financial literacy around Buy Now Pay Later (BNPL) forms of credit and encourage people to access free financial information on the CCPC website
Shop smart for Black Friday/Christmas	To inform consumers of their strong rights when facing issues with a purchase and, if they do need to use credit coming up to Christmas, to encourage them to make informed decisions about the type of credit they use

Campaign Name:	Visits to ccpc.ie	Social Reach	Social Engagement
Consumer rights	19,770	3,226,134	983,682
Mortgage switching	51,659	1,196,995	456,609
Car checks*	9,677	-	-
Take control of your money*	35,508	-	-
Buy Now Pay Later	13,860	1,045,143	205,854
Shop smart during Black Friday/Christmas	23,561	1,519,800	322,338

\* Partnership, no figures available for social reach and social engagement



### Sponsorship

#### The Complaints Bureau on RTÉ One:

The CCPC sponsored a new TV series, The Complaints Bureau. This eight-episode TV series was broadcast on RTÉ One in March and April 2024. Viewers tuned in to see financial

planner Eoin McGee tackling real-life consumer issues with the help of renowned consumer affairs journalists Conor Pope, Amy Molloy, and Siobhan Maguire. The team investigated a wide range of complaints from honeymoon scams and issues with airline

vouchers, to solar panels and second-hand cars.

The series attracted over 2.7 million views, with an average of 343,750 views per episode.

## Alerting consumers to dangerous product recalls

### Unsafe Product Notifications

The CCPC issued 145 product safety alerts to Irish consumers informing them of risks relating to dangerous

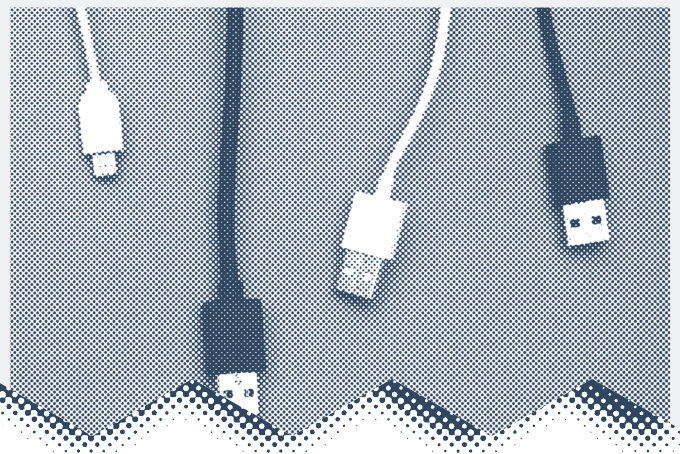
products. These were the result of 129 investigations into notifications about unsafe products from Ireland and across Europe. This taken

together with our own proactive market surveillance work resulted in the notification to Irish consumers of 176,506 dangerous products.

### Limerick Leader

## ALERT: People warned not to use phone chargers that 'should not be sold' in Ireland

The CCPC are urging people to only buy electrical chargers that are safe



Source: Limerick Leader, 5 January 2024

## Supporting reform of the Small Claims Court

As part of a media campaign to publicise the annual contacts report, the CCPC renewed its calls for reform of the Small Claims Court.

Coverage was secured in three national newspapers, with journalists highlighting the fact that 8,731 consumers had been referred to the

Small Claims Court by the CCPC, including more than 1,000 people who had issues with domestic appliances.

## Financial Education

### CCPC research informs Financial Literacy Strategy

2024 was a key year in the development of Ireland's first National Financial Literacy Strategy, and the CCPC was pleased to play its part. The CCPC commissioned Indecon to conduct research into financial literacy in Ireland. The subsequent report showed that education, employment, and gender significantly

impact financial literacy and wellbeing. This built on a previous study from 2023 showing that one in seven people in Ireland report being in too much debt and one in three say they are "just getting by". Both sets of research provided robust evidence in supporting the development of the strategy.

The CCPC also collaborated with the Department of Finance to develop and launch the Strategy, funding consultancy services from the OECD international network for financial education to guide the strategy documentation. Additionally, specialised staff from the CCPC partnered with the Department of Finance to create the National Financial Literacy Strategy website.

RTÉ

# Women and unemployed have lower financial literacy levels, report shows

The report states that higher financial literacy is strongly linked with increased financial wellbeing across all demographic groups.



Source: RTÉ, 13 November 2024

## Global Money Week

The CCPC is the national co-ordinator for Global Money Week, a world-wide awareness raising campaign, organised by the OECD on the importance of ensuring that young people are financially aware. In 2024, Global Money Week was officially launched by Commissioner Mairead McGuinness in a video message promoting financial literacy and education for young people and children in the European Union. A series of online and in-person events from eleven participating organisations in Ireland took place in secondary schools across the country with participants including the Central Bank, Department of Finance, Institute of Banking, MABS, and Revenue.

As part of Global Money Week, the CCPC supported the launch of a new report from the Money Advice and Budgeting Service (MABS) on money attitudes and behaviours of young people living in Ireland. The report, launched by Minister for Finance, Michael McGrath TD, was based on a survey of 1,850 secondary school students, aged mainly between 15 and 17.





### Our Money, Our Future

In September 2024, the CCPC launched Our Money, Our Future, a pilot programme of sponsorship for post-primary schools and Youthreach Centres. Teachers and school leaders were invited to apply for sponsorship of up to €1,000 to support learners as they develop and engage in innovative financial literacy initiatives within their schools and centres. This is part of our ongoing work to promote responsible financial behaviour and understanding from a young age, empowering consumers to make good choices. Initiatives funded by the project will be celebrated during Global Money Week in March 2025.

### Collaboration and Innovation Fund

In November, the CCPC announced it would contribute €250,000 towards adult financial literacy projects in 2025. The projects will support adults with the skills needed to build financial literacy and access financial services.

The CCPC funding was included in a €1 million Collaboration and Innovation Fund, delivered by the Department

for Further and Higher Education, Research, Innovation and Science.

### Money Skills for Life

The CCPC's Money skills for life (Msfl) programme, delivered in the workplace and to community groups, provides impartial, independent information on a range of financial topics. Tailored Msfl talks are presented by volunteer Qualified Financial Advisors and focus on a range of personal finance topics. In 2024, 1,436 people attended Msfl talks.

Attendee feedback: "After the talk, I have already started a spreadsheet

to record my monthly outgoings. I've set up a direct debit to start saving, and I will track my spending"

"I'll keep a closer eye on the T&Cs of my mortgage and pensions."

Employer feedback: "The workshop was informative, interesting, and accessible to all employees. The presenter was incredibly helpful, engaging, and informative, regardless of the questions asked. It was a great session!"



### Money Matters

Money Matters is the CCPC's personal finance course for second-level students. The resources are available online in both English and Irish and have been developed in conjunction with OIDE to align with Junior Cycle Business Studies and Home Economics curricula. The Money Matters website had 54,561 page views in 2024.

### Junior Achievement Ireland

The CCPC Financial Education team was pleased to support Junior Achievement Ireland (JAI) to provide JA Finance Park, an interactive personal finance programme aimed primarily at Junior Cycle students.

JA Finance Park helps build a foundation for making informed personal financial decisions on a

lifelong basis, including issues related to income, spending, saving, and credit. During 2023/2024 school year, 733 students participated from 21 schools around the country in the programme.





# Strategic Goal 3

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## Advocacy and Research

**AMBITION:** To make markets work better for consumers by representing their interests nationally and internationally

**MEASURES:**

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

### Advising policy makers and regulators on legislative change and making policy recommendations

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**National Competitiveness and Productivity Council (NCPC)**

The National Competitiveness and Productivity Council (NCPC), of which CCPC Chair Brian McHugh is a member, published its annual Ireland's Competitiveness Challenge report in July 2024. The 2024 report made a number of recommendations to Government that are aimed at enhancing Ireland's competitiveness and productivity performance.

A number of the CCPC's suggestions were included in the final report including: the introduction of a profession of conveyancer; that the report reflect recommendations contained in the OECD report Better Regulation Practices across

the European Union 2022 and; a recognition of the need for both the private and public sector in Ireland to be able to attract/source, retain and develop employees with digital skills.

**National Payments Strategy and the Consumer Protection Code**

The CCPC engaged with the Department of Finance ahead of the publication of the National Payments Strategy in October 2024, and we welcomed the inclusion of a number of our recommended measures. These included: identifying and addressing barriers to the full adoption of open banking, monitoring the implementation of instant payments, and increasing efforts to build greater awareness of

fraud and fraud prevention among Irish consumers. We also called for measures that would assist in promoting further competition in the payments sector, facilitate instant payments and strengthen consumer access to open banking services. Consumers also need better protection against fraud.

The CCPC also called for pro-consumer measures in the Central Bank's revised Consumer Protection Code (scheduled for publication in 2025), highlighting the importance of supporting consumers to improve their financial literacy and facilitate more switching between products and services.

Irish Mirror

# Gardaí set to brief ministers and Taoiseach on online safety

Simon Harris is set to chair an Online Safety Summit in Government Buildings on Thursday



Source: Irish Mirror, 19 September 2024

## Support enactment of legislation to allow screening of public tender data to detect bid-rigging

Screening involves competition agencies proactively analysing tender data to identify elements or patterns that may indicate bid-rigging and can lead to formal investigations. In 2024, the CCPC prioritised gaining a further understanding of what types of public procurement data is held by public bodies in Ireland which is useful for screening, where this data is held, and who has access rights to this data. This involved engagement with relevant stakeholders such as the OGP.

Access to public procurement data would allow the CCPC to further identify and pursue bid-rigging where it has occurred, and would act as a deterrent to those considering undertaking such harmful behaviour. This is a priority project for the CCPC and with our forensic technology resources and skills, we are confident we will be ready to begin screening as soon as the data is available.

## Government Housing for All Expert Group on Conveyancing and Probate

The Government established the Housing for All Expert Group on Conveyancing and Probate in January 2024. We called for the Expert Group to recommend better guidance for consumers and much needed and long overdue reforms to make the process of house buying and selling quicker and easier, such as advances in e-conveyancing. We also called for a timetable to be set

out for the creation of a profession of conveyancer, price transparency in conveyancing, and provided ideas for making digital probate processes more user-friendly. The Expert Group reported in October 2024 and the CCPC was invited to join the implementation group to deliver on its recommendations.

## General Product Safety Regulation (GPSR)

The General Product Safety Regulation was applied from December 2024. The CCPC engaged with the Department of Enterprise, Trade and Employment to implement the GPSR and assist in the drafting of the statutory instruments.

## Transport

The CCPC responded to the Department of Transport consultation on a National Policy Framework for Alternative Fuels Infrastructure in Transport calling for the competitive roll-out of Electric Vehicle (EV) charging infrastructure, price transparency in charging and to ensure providers who facilitate easy charging access for customers have equal access to infrastructure. The CCPC also advocated for a focus on competition between ports in the forthcoming National Ports Policy. Publication of the Framework is expected in 2025.

## OECD Economic Survey report on Irish economy

The CCPC engaged with the OECD while they were preparing their

latest Economic Survey report on the Irish economy. We highlighted the need for competition-enhancing measures in the legal sector, the need for the CCPC to be given more powers to screen for bid-rigging in public procurement and the need for measures to enhance the mortgage switching process. The Survey is expected to be published in 2025.

## Coimisiún na Meán's draft Online Safety Code

The CCPC contributed to a consultation on Coimisiún na Meán's draft Online Safety Code, supporting the inclusion of proposed measures relating to commercial content but calling for the Code to be clearer, particularly on social media influencers. We were able to point the Coimisiún to joint guidance issued by the CCPC and the Advertising Standards Authority (ASA) for influencers on the labelling of ads.

We welcomed that the final Code, published in October 2024, included further guidance for service providers on how to ensure their users declare commercial content.

## Alternative Dispute Resolution

As the designated Alternative Dispute Resolution (ADR) competent authority in Ireland, the CCPC provided detailed input at national and European Commission level into the EC's proposal to review the ADR Directive, which aims to resolve disputes between consumers and traders out-of-court. The proposed



revision aims to simplify the process, make ADR more suitable to digital markets and facilitate the use of ADR across European borders. The CCPC welcomed the proposed expansion of the scope of the Directive, as it will broaden consumer access to dispute resolution. We also welcomed the inclusion of measures aimed at safeguarding easy access to ADR procedures for consumers who may have limited online access or skills.

#### **Empowering Irish consumers for the Green Transition**

In 2024, the CCPC was pleased to work closely with the Department of Enterprise, Trade and Employment (DETE), as the Irish government prepared its input to the European Commission's draft Right to Repair Directive. The Right to Repair Directive aims to drive more sustainable consumption, increasing the repair and reuse of goods and extending the

lifetime of consumer products. It will apply across all Member States from July 2026.

In 2024, the CCPC also contributed expert advice on the impact on consumers as the EU Green Transition Directive was transposed into Irish law. The Green Transition Directive lays down new rules around businesses making environmental claims and will ban unaccredited sustainability labels. It will apply across all Member States from September 2026.

#### **Package Travel Directive**

In 2024, CCPC provided input to DETE on the potential impact on the CCPC's enforcement and information activities, of proposed amendments to the European Commission's Package Travel Directive. The EC's proposed amendments seek stronger and clearer rights for travellers, covering

issues such as deposits, vouchers and refunds in the case of cancellation.

#### **Presenting the CCPC advocacy priorities to political representatives**

The CCPC met with political representatives from across the political spectrum in 2024 to lay out our advocacy priorities. These included: seeking additional fining powers for breaches of consumer law, access to public procurement data to better detect bid rigging, reform of the Small Claims Procedure, and direct access for consumers to car history data.

Our priorities were reflected in a number of manifestos across the political spectrum ahead of the General Election in 2024 and subsequently in the Programme for Government. We look forward to further engagement with policy makers over the Dáil term.

## **Providing a strong voice in national debate**

#### **Reforming the Legal Sector to work better for consumers**

In April 2024, in response to the publication of the long anticipated Legal Services Regulatory Authority's report on a conveyancing profession, chairperson Brian McHugh called on the Government to increase the pace and ambition around legal reform, specifically requesting it sets out a timetable to reform. His comments were widely picked up by national media and published in an opinion piece in the Business Post. In it, Brian McHugh called for an obligation on solicitors and barristers to publish general service prices, an increase in the financial limit for taking a case to the Small Claims Court and the collection of more and better data to identify further areas for reform and to guard against anti-competitive behaviour. He also called for an end to the Law Society and King's Inns monopolies on legal education to increase diversity in the sector.

Having long called for new business models to stimulate competition in legal services, the CCPC welcomed the introduction of Legal Partnerships between solicitors and barristers by the Legal Services Regulatory Authority in September 2024.

#### **Business Post**

## **Competition needed in conveyancing sector to ease process of buying a home, says watchdog**



Source: Business Post, 11 April 2024



## Research

### Consumer Detriment

In February 2024, the CCPC published a report titled Understanding Consumer Detriment in Ireland, underpinned by a survey of 4,537 Irish consumers. The research found that 39% of Irish consumers experienced an issue that either cost them money or time or caused them stress, while the total monetary value of consumer detriment in the Irish economy was estimated to be almost €1 billion.

### State of Competition in Ireland

The CCPC commenced the State of Competition in Ireland project, a comprehensive study which will, for the first time, benchmark competition levels across several sectors of the Irish economy. In April 2024, as part of the initiation of the project, an Invitation for Input was issued seeking feedback on the proposed approach and scope. Respondents included academics, economists as well as regulatory and industry bodies. The responses received proved valuable in determining the project approach, with the first set of findings to follow in 2025.

### Back to school costs

In May 2024, the CCPC surveyed 1,202 parents of school-going children in Ireland on back-to-school costs. The CCPC's calls on schools to be upfront and transparent about voluntary contributions was widely picked up by media including RTÉ. The research also highlighted the need for further examination of competition

RTÉ

## Parents hit by extra costs see back-to-school bills mount – survey



Source: RTÉ, 3 July 2024

and consumer protection issues in this area and findings will follow in 2025.

### Consumer/Business Insight Projects

Throughout 2024, the CCPC conducted a range of research projects with representative samples of consumers and/or businesses in different markets. These led to public communications on Pensions, Black

Friday Sales and Christmas shopping activities. Other work supported on-going investigations and mergers determinations being carried out by the CCPC. Placing consumer, or business, voices at the heart of these activities ensures that our actions are consumer led and informed by the best interests of end users in the markets.

### Irish Examiner

## Consumers lose interest in Black Friday sales, with only 36% planning to buy



Source: Irish Examiner, 22 November 2024





## Stakeholder engagement

### CCPC 10th anniversary event

In October 2024, the CCPC marked its 10-year anniversary with an event for staff and stakeholders. The occasion was led by CCPC Chair Brian McHugh and attended by Emer Higgins TD, Minister of State at the Department of Enterprise, Trade and Employment. The event included two panel discussions with former members Karen O'Leary, Fergal O'Leary and Stephen Calkins, reflecting on the challenges of creating the Commission from two predecessor organisations; and a second panel with former CCPC chair Isolde Goggins, economist John Fingleton and legal academic, Dr Cliona Kelly covering the challenges facing Ireland and its economy, and the potential impact on consumers.



### **CCPC holds joint seminar with Olivier Guersent, Director General of the Directorate General for Competition (DG Comp)**

In December 2024, the CCPC hosted an event at the Institute for International and European Affairs (IIEA) at which Olivier Guersent, Director-General of the Directorate General for Competition spoke about the EU Commission's priorities for competition policy. Mr Guersent's comments were particularly resonant in light of the report by former ECB president Mario Draghi published in September 2024, which stated that EU competition policy must adapt to ensure greater focus on fostering innovation and restoring the EU's long-term competitiveness.

CCPC chair, Brian McHugh joined a panel of experts, chaired by Dan O'Brien of the IIEA, in exploring how concepts in the Draghi report may be incorporated into any future Commission guidelines and how it will influence the new EU Commission's approach to competition enforcement.

### **Richard Whish seminar**

The CCPC's annual Richard Whish Seminar on Developments in Competition Law took place on 29 May 2024. Professor Richard Whish KC delivered a compelling review of the past year's enforcement landscape, covering major cases brought by the European Commission and national competition authorities, as well as significant judgements from the European Court of Justice and national courts. The seminar continues to serve as a vital resource for competition officials from the CCPC and ComReg, along with invited stakeholders.

### **CPC Network peer-to-peer events**

In March, the CCPC hosted a CPC Network peer-to-peer meeting hosting colleagues from Cyprus, Italy, the Netherlands and Slovakia to discuss and learn best practices and experiences in consumer protection enforcement.

### **International Consumer Protection and Enforcement Network (ICPEN)**

The CCPC played an active role in the International Consumer Protection and Enforcement Network (ICPEN) in 2024, participating in various working groups (such as those on Artificial

Intelligence, Agency Effectiveness, and Misleading Environmental Claims). This work enhances our awareness of important cross-border working practices, methods and issues, and helps to identify best practices that we can develop and implement within the CCPC.

### **North South Consumer Organisations Working Group**

The CCPC attended two meetings of the North South Consumer Organisations Working Group in 2024. This group is made up of representatives from consumer-organisations on the island of Ireland and the UK. These meetings facilitate a co-ordinated and strategic approach to consumer issues of significance through the development of consensus on related issues, collaboration and shared learning. Among the issues addressed this year were the continuing challenges consumers have experienced post-Brexit, the continuous spread of influencer marketing and consumer protection and product safety issues when buying online.

### **Economic Regulators Network Conference**

The CCPC hosted the first Economic Regulators Network (ERN) "Economics Conference" in October 2024. The event brought together many Irish regulatory bodies to discuss issues impacting consumers and the wider economy. Former European Commission Chief Competition Economist, Tommaso Valletti, delivered the keynote address. The conference covered three core themes: competition within the broadband and car park sector, consumer protection across industries and on online platforms, and the role of regulation in moving towards a sustainable green transition.

The Learning and Development Team also chaired the Economic Regulators Network Learning and Development Quarterly Meetings to share ideas and build relationships with other enforcement agencies.

### **The National Criminal Investigation Forum**

Founded in 2021 by the CCPC, the National Criminal Investigation Forum brings together state agencies with the authority to conduct criminal

investigations. The Forum enables investigators to exchange knowledge, discuss current issues, share firsthand experiences in criminal investigations and enforcement, and serve as a resource for collaborative solutions. In 2024, the Forum convened three times, addressing various topics, including inter-agency co-operation, regulatory prosecutions and effective interviewing in regulatory investigations.

### **European Accessibility Act**

The CCPC has been working closely with the Department of Children, Equality, Disability, Integration and Youth and the National Disability Authority, to prepare for the European Accessibility Act which will apply from 28 June 2025.

### **Co-chairs of the European Competition Network Mergers Working Group for 2023/2024**

In 2024, the CCPC co-chaired the European Competition Network Mergers Working Group along with the Hungarian Competition Authority. In June 2024, the CCPC hosted the ECN Merger Working Group at Dublin Castle. The meeting was attended by representatives of each of the EU Member States, from the European Free Trade Association, and from the European Commission. Commission member, Úna Butler, welcomed the delegations to the event, during which there were detailed discussions on work group projects, policy issues and cases.

### **OECD Guidelines on Fighting Bid-Rigging in Public Procurement**

CCPC staff participated in the 'Co-operation and Enforcement' working party of the OECD's Competition Committee, on draft revised Guidelines for Fighting Bid-Rigging in Public Procurement.

### **Economic Crime and Corruption Forum and Advisory Council on Economic Crime and Corruption**

In March 2024, CCPC staff delivered a presentation to member agencies of Ireland's Economic Crime and Corruption Forum on the work of the CCPC in tackling cartels and bid-rigging. In November 2024, CCPC staff participated in the stakeholder forum consultation on the development of a multi-annual strategy to combat economic crime and corruption.



## Speaking engagements

### American Bar Association (ABA)

In April 2024, Commission member, Úna Butler, was interviewed by New York-based antitrust lawyer Ilene Gotts, at the annual American Bar Association Antitrust Section Spring meeting. Topics covered included the CCPC's new competition adjudication regime, enforcement priorities, merger call-in powers and the CCPC's anticipated role under the Digital Markets Act.

### International Consumer Protection and Enforcement Network High Level Conference, Gdansk

In May 2024, Brian McHugh led a panel discussion on 'Dark Patterns' and their impact on consumers at the International Consumer Protection and Enforcement Network High Level Conference, Gdansk. This event was attended by consumer protection authorities worldwide and topics covered included online gaming, the green transition, and Alternative Dispute Resolution.

### International Competition Network Annual Conference Brazil

Brian McHugh chaired the discussion for the International Competition Network (ICN) Cartels Working Group Plenary "A new era of cartel enforcement". CCPC staff also moderated a session on the Counterfactual assessment in merger review for the Merger working group.

### European Competition Network Directors General Meeting, Split, Croatia

In June, Brian McHugh presented the CCPC's experience with non-standard counterfactuals in merger review to the European Competition Network (ECN) Director Generals' (DGs) meeting in Split, Croatia. The DGs meeting is a bi-annual event of the heads of the European competition authorities to foster fruitful discussions, exchanges of views and the development of common positions and policies.

### OECD Competition Committee

In December, Úna Butler gave an extended presentation on Ireland's submission to the OECD Competition Committee roundtable on the "Standard and Burden

of Proof in Competition Cases".

Úna discussed the differences between the standard and burden of proof required in criminal and administrative proceedings as well as the relevant standard and burden of proof in merger review case.

### Office of Government Procurement Clients Conference

In November 2024, CCPC Chairperson, Brian McHugh gave a speech to 1,100 attendees (in person and online) at the OGP Clients Conference in Dublin Castle.

### CCPC joins OECD/ EU Technical Support Instrument Six-Country Project on Bid-Rigging

The Technical Support Instrument (TSI) is the EU programme that provides tailor-made technical expertise to EU Member States to design and implement reforms. In November 2024, Ireland along with five other member states applied for TSI funding for the project "Strengthening Detection and Reporting of Bid-Rigging in Czechia, France, Ireland, Latvia, Poland, and Portugal". The decision is expected in 2025, and training will be led and coordinated by the OECD.







# Strategic Goal 4

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## Structure and Resource

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

**MEASURES:**

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

### Developing our plans, aligning our resources

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**Periodic Critical Review**

In 2024, the Department of Enterprise, Trade and Employment (DETE) completed a Periodic Critical Review of the Competition and Consumer Protection Commission (CCPC). This process supports the identification of key issues that might have an impact on the CCPC delivering on its mandate. The review highlighted the challenges posed by an evolving external environment and consequent expansion of the CCPC's mandate, largely due to new European legislation.

The CCPC's expanded functions include areas such as increased competition enforcement powers, new consumer protection legislation, expanded product safety responsibilities, and new areas like digital and data regulation. The review found that "the CCPC has shown flexibility and adaptability in responding to changes in the

external environment since its establishment in October 2014". It also found that "the CCPC has taken, and is taking, significant steps to review and address matters of high-level management structures, staffing recruitment and retention, operational management, case management, IT infrastructure and accommodation."

The review also found that "despite capacity constraints, particularly in staff recruitment and retention, the CCPC has shown adaptability in addressing these challenges". The review concluded with recommendations for the CCPC to report to DETE on: organisational initiatives, including on staff recruitment and retention; core versus new activities and related synergies and efficiencies; planned market studies; financing options; management arrangements. It also recommended that the CCPC

undertake periodic, independent outcome effectiveness assessments of its functions.

**People Strategy**

Arising from the Strategic Workforce Plan developed in 2023, and in order to align with the organisational strategy, the CCPC created a three-year People Strategy in 2024 with three goals: for the CCPC to be an 'Employer of Choice'; to develop and build on the capacity, expertise, leadership and management capabilities of the staff; to create an engaged and empowered workplace.

**Senior Structure Organisational Review**

As part of the strategic workforce planning process, the Commission members undertook a review of the CCPC's senior management structure, which has remained unchanged since the organisation was launched in 2014. Since then,

the sanctioned headcount has grown from 78 on establishment in 2014 to 261 at the end of 2024 and five new divisions have been added to take account of our evolving mandate. The review benchmarked the Commission against other similar sized organisations, considered a range of options and proposed changes to the senior management structure. The report has been submitted to the Department of Enterprise, Trade and Employment.

#### **New Human Resources Information System (HRIS)**

In 2024, the CCPC started a project to procure and implement an integrated Human Resources Information System (HRIS). This is part of the commitment to develop workplace practices that meet the changing needs of the workforce and ensure compliance with all governance requirements. It will streamline processes, support the organisation as it scales to meet its increased remit and, allow for the confidential processing of data. The

new system will be fully operational in 2025.

#### **Recruitment**

The CCPC recruited 65 members of staff in 2024 and received sanction for 35 additional roles in 2024. By the end of the year there were a total of 261 approved posts. This was an increase of 16% from 2023. The CCPC's staff turnover rate is 10.77%, against a national average of 11.5%, as reported by the Central Statistics Office.

## **Developing our people**

### **Performance Management**

The performance management and development system (PMDS) was reviewed and updated in 2024. This was a further step towards enabling our people to develop their capability and achieve their career goals within the CCPC.

### **Professional Development**

The CCPC maintained its dedication to the ongoing professional development of its people in 2024. This included specialised training for Authorised Officers, economics and internet investigations training, and sponsored education delivered by

accredited legal and financial bodies.

The CCPC also hosted training sessions with academic and industry experts who shared their knowledge on competition and consumer law.

## **Developing and delivering our ICT strategy**

### **New Digital Solutions Unit**

The CCPC has established a new digital solutions unit with responsibility for leading ICT change programmes and ensuring the effective delivery of modern digital solutions and applications to support staff and organisational stakeholders.

The unit is seeking to enhance services in alignment with our ICT strategy, identifying digital trends and challenges.

### **Moving to the Cloud**

A major project was completed in 2024 with the migration of the

CCPC's document management system to the cloud-based solution, SharePoint. The move provides staff with enhanced communication and collaboration tools in a single platform that is easily and securely accessible.

## **Workplace best practice**

### **Green Agenda**

Due to the timing of the availability of final data on the M&R system and the date of publication of the CCPC Annual Report, it is only possible to report provisional data for the year in question. In 2023, the CCPC reported that the CCPC expected to have a 48.4% reduction in greenhouse gas emissions from the baseline. The final data shows that the CCPC had an even greater reduction of 53.6%. In respect of energy savings, energy performance improved by 85.3% from the baseline and not 86.5% as reported in our 2023 Annual Report.

The provisional 2024 SEAI data shows that we delivered 87% in energy savings since the baseline year (2009). It also shows that if energy performance is maintained at this level up to 2030, the efficiency target will be achieved. The provisional SEAI data also indicates that we had a 56.2% reduction in greenhouse gas emissions from the baseline emissions.

In 2024, the CCPC published its Climate Action Roadmap on its website. This Roadmap specifies how the CCPC will implement the Climate Action Mandate (CAP24) and

deliver on its energy efficiency and emissions reduction targets. Climate Action Leadership training for senior management within the organisation was also commenced with 56.25% of the management team completing the course in 2024. We also provided information on the implementation of the Mandate via the SEAI Monitoring and Reporting System.

The CCPC paid €1,768.09 into the Climate Action Fund in respect of the travel emissions incurred during 2024.



Sustainability Activity

The CCPC achieved a Bronze Smarter Travel Award for the implementation of sustainability initiatives in 2024. To help protect our environment, support the circular economy and reduce the litter we produce, we provided staff with the means to dispose of bottles and cans using the

Re-Turn scheme. The money is being distributed to charities chosen by the staff.

Wellbeing

The Wellbeing Committee organised 27 events to support the mental and physical wellbeing of our staff, an increase of almost 100% on 2023.

Events during the year included: wellbeing talks, staff quizzes, charity fundraisers and volunteering opportunities. In addition to the Employee Assistance Programme, staff were offered a new digital wellbeing programme to aid their mental, physical, and financial health.

Governance best practice

The Commission

The CCPC is governed by a Commission that in 2024 consisted of a Chairperson and three full-time Members. The Chairperson is responsible for the running of

the organisation and corporate governance. The Chairperson is assisted in the leadership and management of the CCPC by the Members and other senior executives.

The Members of the Commission are appointed by the Minister for Enterprise, Trade and Employment, following an open Public Appointments Service competition, for a term not exceeding five years.

Board Member	Role	Date Appointed	No. of Meetings
Brian McHugh	Chairperson	2 August 2023	29/31
Patrick Kenny	Member	10 January 2022 (date renewed)	30/31
Úna Butler	Member	10 January 2022	29/31
Kevin O'Brien	Member	22 August 2022	28/31

The table above details the appointment period for members and a schedule of attendance at Commission meetings

The Commission meets at least twice a month to review CCPC activities, provide direction and strategic guidance in particular areas and make formal decisions.

The matters reserved for decision by the Commission include:

- Approving annual budgets, corporate plans, annual reports, financial statements and strategy statements
- Approving policies covering finance, procurement, risk, human resources, codes of conduct and conflicts of interest
- Approving major contracts, investments, capital projects and borrowing money

- Approving the appointment of staff, their terms and conditions of service, and remuneration
- Making a determination that a merger may or may not be put into effect
- Starting civil proceedings on a breach of Sections 4 or 5 of the Competition Act 2002 or Articles 101 or 102 of the Treaty of the Functioning of the European Union
- Starting a prosecution for an offence as set out in the Consumer Protection Act 2007
- Referring a file to the office of the Director of Public Prosecution (DPP) for alleged cartel offences

- Making a recommendation to the DPP to grant or revoke conditional immunity for involvement in a cartel

Day-to-day organisational matters are managed through informal meetings, discussions and consultation between the Chairperson and the Members. As far as practical, operational decision-making is delegated to individual Members, Directors and other staff.

**Risk Management**

The Commission has overall responsibility for risk management, which includes determining the nature and extent of significant risks the CCPC will accept at a strategic and operational level.

Risk management within the CCPC consists of a combination of:	risks facing the CCPC and how they are actively managed	ARC Charter and Terms of Reference sets out its roles and responsibilities. The ARC work programme is guided by the obligations set out in the 2016 Code of Practice for the Governance of State Bodies (2016 Code). The ARC reports to the Commission after each meeting and formally, in writing, annually. ARC membership during 2024 was Martin Higgins (external Chairperson), Carmel Foley (external), Eilis Quinlan (external), and Úna Butler (internal). The ARC met four times in 2024, as detailed in the table below:
<ul style="list-style-type: none"><li>Quarterly reviews of Divisional Risk Registers and the Corporate Risk Register</li><li>Risk incidents and near misses reporting by Directors, including mitigating actions</li><li>Regular evaluations by internal audit</li><li>Reporting to Audit and Risk Committee meetings on the top</li></ul>	<ul style="list-style-type: none"><li>Risk challenge meetings with Directors</li><li>Reviews of risk management policies and procedures</li></ul> <p><b>Audit and Risk Committee</b> The Audit and Risk Committee (ARC) supports the Commission on its responsibilities for risk, control and governance, and associated assurance. The ARC is independent in the performance of its functions. The</p>	

Committee Member	Feb	May	Oct	Dec	Total
Martin Higgins	x	x	x	x	4/4
Carmel Foley	x	x	x	x	4/4
Eilis Quinlan	n/a	n/a	x	x	2/4
Úna Butler	x	x	x	x	4/4

Public body compliance

<p><b>Data Protection</b></p> <p>The CCPC has a suite of internal policies to ensure our ongoing compliance with the Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR). Our website has detailed privacy notices to enable those who engage with us to understand how we treat any personal data we process and understand how they can exercise their data protection rights.</p>	<p>16 were part-granted, seven were refused and two were withdrawn/handled outside the FOI legislation.</p>	
<p><b>Ethics</b></p> <p>The CCPC has measures in place to ensure that the staff of the CCPC, holding designated positions, comply with the provisions of the Ethics in Public Office Act, 1995 and the Standards in Public Office Act, 2001. In 2024, CCPC staff holding designated positions submitted Statements of Interest as required by ethics legislation. In addition, the CCPC's Code of Conduct sets out the principles, standards and values to which all CCPC staff are expected to adhere.</p>	<p><b>Finance</b></p> <p>The CCPC has measures in place which allow for the acceptance of cash as an option for payment by members of the public.</p> <p><b>Public Spending Code</b></p> <p>The CCPC has complied with all the requirements of the Code of Practice for the Governance of State Bodies 2016. The CCPC has put in place robust financial management, monitoring, and control mechanisms, underpinned by the Public Financial Procedures set out by the Minister for Public Expenditure, National Development Plan Delivery and Reform. The CCPC is satisfied that it has adhered to the relevant principles, requirements and guidelines of the Public Spending Code and that it has consistently obtained the best possible value for money.</p> <p><b>Customer Service</b></p> <p>The CCPC has a Customer Charter and Customer Action Plan which covers the period 2024 to 2026. The Customer Charter sets out the level</p>	<p>of service a customer can expect. The Charter is supported by the Customer Action Plan, which provides detailed actions as to how the commitments and standards set out in the Charter will be delivered. These actions have associated performance indicators, against which the CCPC performed effectively in 2024. Specifically, in 2024:</p> <ul style="list-style-type: none"><li>We completed a series of accessibility projects on the current website which have brought our accessibility score with the National Disability Authority up to 97%</li><li>87.7% of calls were answered within 20 seconds</li><li>99% email and webform contacts were answered within 15 working days</li><li>One customer service complaint was received and resolved within 1 working day</li><li>In line with our obligations under the Irish Sign Language Act, 2017, the CCPC works with the Irish Remote Interpreting Service (IRIS) to provide information to Irish Sign Language users</li></ul>
<p><b>Freedom of Information</b></p> <p>In 2024, the CCPC received 27 Freedom of Information (FOI) requests. Of these, two were granted,</p>		



### Official Languages Act (and related legislation)

The CCPC is committed to meeting all its obligations under the Official Languages Act (and related legislation). A member of the Senior Management Team has been appointed to oversee performance and report on the CCPC's obligations under the Official Languages Act (and related legislation).

The following actions were taken by the CCPC during the year 2024 to ensure compliance with the Act:

- Staff training – two staff members participated in a Certificate in Professional Irish course.
- Responding in Irish – the CCPC received six contacts in Irish; two emails, three phone calls and one social media. All written requests were responded to in Irish and all callers were offered a callback with an Irish Language speaker.

The CCPC received a request for a published market research survey to be provided in Irish, which was provided.

In 2024, the CCPC submitted its first report under section 10A (Advertising by Public Bodies). The new provisions in s10A mean that 20% of any advertising placed by public bodies in a given year must be in the Irish language, and 5% of each public body's annual advertising budget shall be spent on advertising in the Irish language on Irish language media.

In March 2024, the CCPC reported:  
– 2.84% of any advertising placed in 2023 was in the Irish language

– 1.37% of the 2023 media buy budget was spent on advertising in the Irish language through Irish language media

The CCPC communications strategy for this reporting year was seeking to increase value for money by maximising use of pre-existing communications collateral, much of which had already been developed in the English language and did not lend itself easily to direct translation within the existing materials.

Where our campaign activity lent itself to the creation of new assets the CCPC actively complied with the requirements of S10A and deliberately set out to exceed them. For example, in one campaign 39% of radio ads were in Irish and there was an 8.1% spend on Irish language radio.

However, some of our campaigns involved one off media appearances rather than repeat campaign activity, which reduced our ability to meet the obligations. We reaffirm our commitment to meet our Irish language obligations and are actively seeking solutions to some of the challenges we have met in complying.

The CCPC also publishes its Annual Report in Irish annually.

### Prompt Payments

The CCPC complies with the Prompt Payment of Accounts Act 1997 and the European Communities (Late Payment in Commercial Transactions) Regulations 2002. In 2024, 78% of our payments were made within 15 days and a further 19% were made within 30 days. Payments made outside of 30 days accounted for 3%

of the CCPC's total payments. The payments made over 30 days were mainly under query, apart from one where interest and compensation of €2,219 was paid. The CCPC's Prompt Payment Returns are published on our website.

### Oversight and Performance Delivery Agreement (OPDA)

A written Oversight and Performance Delivery Agreement (OPDA) is in place between the CCPC and our parent Department, the Department of Enterprise, Trade and Employment (DETE), which clearly defines the terms of our relationship. In 2024, four formal OPDA meetings between the CCPC and DETE officials took place.

### Protected Disclosures

The CCPC is required under Section 22 of the Protected Disclosures Act 2014 to publish an annual report on the number of protected disclosures we received in the preceding year and the action we took on them. The 2024 Protected Disclosures Annual Report is published on the CCPC website.

## Finance

### 2024 Financial Statements

The CCPC's budget allocation as set out in the published REV in 2024 was €25,701,000, where €24,415,000 was Exchequer funding and €1,286,000 was prefunding a portion of a financial services industry levy, in respect of specific personal finance information and education functions in the financial sector. At the time of writing, the annual draft financial statements report expenditure of €25,091,545 for Exchequer-funded activities and €4,405,425 for levy-funded activities. The Office of the

Comptroller and Auditor General will audit the CCPC's financial statements. The financial statements are prepared on the accruals basis of accounting, except for the Exchequer funding, which is prepared in accordance with generally accepted accounting principles.

### Levy on Financial Services Providers

Over 99.8% of the total of the 2024 levy amount imposed on financial services providers was successfully collected from 383 companies.

### Remuneration

The Chairperson is a member of an unfunded defined benefit public sector scheme, and his entitlements are in accordance with the terms of the relevant Public Service defined benefit superannuation scheme.

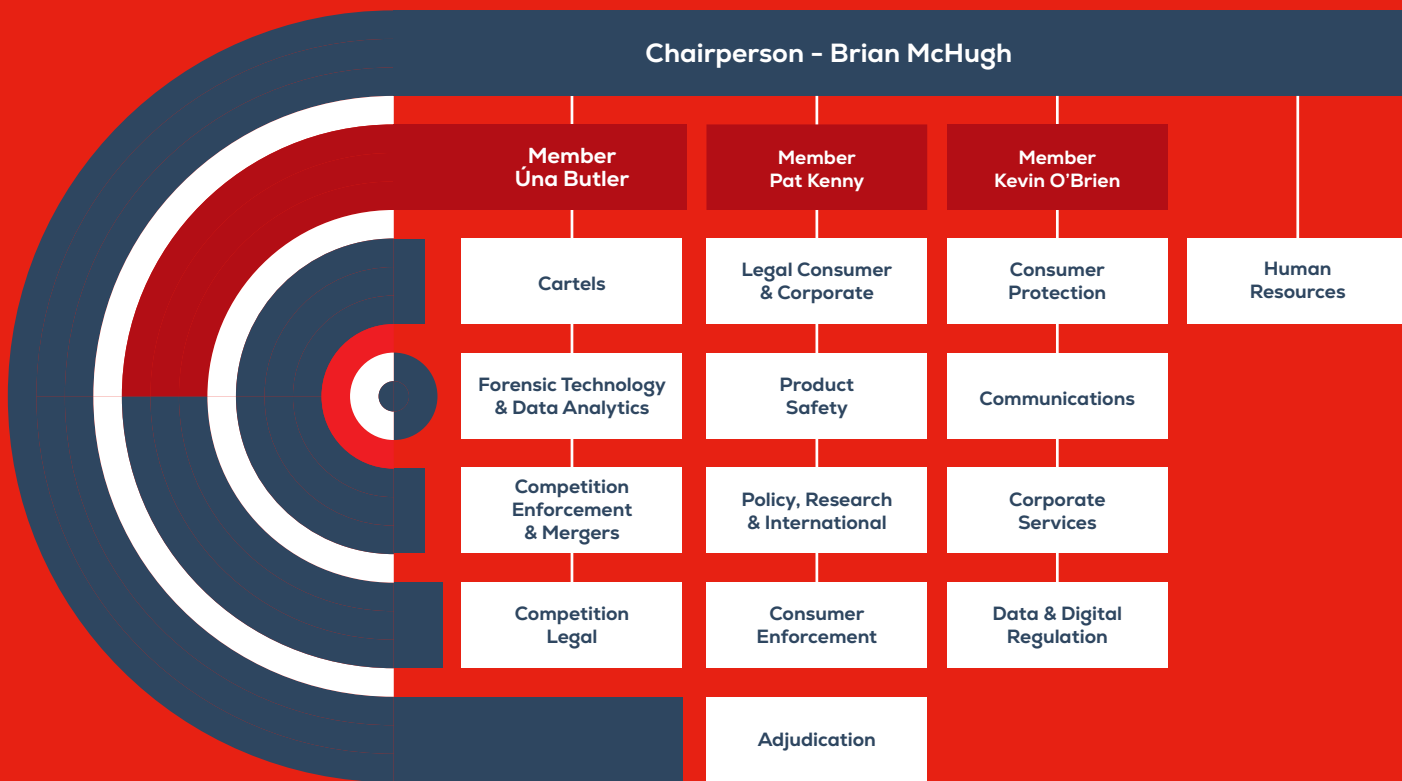
Commission expenses in 2024:

- Brian McHugh: €7,671
- Patrick Kenny: €28
- Úna Butler: €6,270
- Kevin O'Brien: €6,385





# Appendix One



# Appendix Two

## Statement on Internal Control

**Please note: The annual report is required by legislation to be sent to DETE by the end of June each year. At the time of publication, the Comptroller and Auditor General has not audited the Statement of Internal Control but will do so at a later date.**

### Scope of Responsibility

On behalf of the Competition and Consumer Protection Commission, we acknowledge the Commission's responsibility for ensuring that an effective system of Internal Control is maintained and operated. This responsibility takes account of the requirements of the Code of Practice for the Governance of State Bodies (2016).

### Purpose of the System of Internal Control

The system of Internal Control is designed to manage risks to a tolerable level rather than eliminate it. The system can therefore

only provide reasonable and not absolute assurance that assets are safeguarded, transactions are authorised and properly recorded, and that material errors or irregularities are either prevented or would be detected in a timely period.

The system of Internal Control, which accords with the guidance issued by the Department of Public Expenditure, NDP Delivery and Reform has been in place in the CCPC for the year ended 31 December 2024 and up to the date of approval of the financial statements.

### Capacity to Handle Risk

The Audit and Risk Committee (ARC) comprises a Chairperson and three members (two of whom are external / independent). The ARC met four times in 2024.

The Commission has a properly constituted internal audit function which is adequately resourced and

conducts a programme of work agreed with the ARC. The internal audit function operates in accordance with the Code of Practice for the Governance of State Bodies (revised 2016). The Commission's monitoring and review of effectiveness of the systems of Internal Control is informed by the work of the outsourced internal auditor and the Audit and Risk Committee.

The following reviews were carried out in 2024:

- Review of effectiveness of internal controls
- CCPC payroll
- Money Tools calculators (validation)
- Business continuity and disaster recovery
- A follow up review in respect of the recommendations made in previous internal audit reviews.

The Commission has developed a risk management policy which sets out its risk appetite, the risk management processes in place and details the roles and responsibilities of staff in relation to risk. The policy has been issued to all staff to alert management on emerging risks and control weaknesses. This policy is reviewed by the Commission periodically and, where revisions are approved, is presented to the CCPC's Audit and Risk Committee for review.

### Risk and Control Framework

The CCPC has implemented a risk management system which identifies and reports key risks and the management actions being taken to address and, to the extent possible, to mitigate those risks.

A corporate risk register is in place which identifies the key risks facing the CCPC and these have been identified, evaluated and graded according to their significance. The register is normally reviewed and updated by the Commission on a quarterly basis. The risk register details the controls and actions needed to mitigate risks and responsibility for operation of controls assigned to specific staff.

The most up-to-date Corporate Risk Register is provided in advance of each ARC meeting along with a memo detailing any changes, including the reasoning for such changes.

The systems of Internal Control are based on a framework of regular management information, a system of delegation and accountability, a set of financial procedures, administrative procedures including segregation of duties and rigorous ongoing checks by the finance function.

We confirm that a control environment containing the following elements is in place:

- A comprehensive budgeting system with an annual budget, which is reviewed and approved by the Members of the Commission
- Authorisation limits are set for the disbursement of the Commission's funds
- Regular review by the Members

of the Commission of periodic and annual financial information and reports (including management accounts), which indicate financial performance against budgets

- There are clearly defined management responsibilities, including financial responsibilities which have been assigned with corresponding accountability
- There are policies and procedures for all key business processes, which are reviewed regularly
- Monitoring and reporting on internal control processes, including an Annual Assurance Statement completed by Divisional Directors
- There are mechanisms and systems aimed at ensuring the security of the Information and Communication Technology (ICT) systems
- There are formal procedures to monitor the activities and safeguard the assets of the organization
- Payment of CCPC's salaries is conducted through the National Shared Services Office (NSSO) and is covered by an Employee Services Management Agreement between the NSSO and the CCPC's parent Department (DETE)

### Ongoing Monitoring and Review

Formal procedures have been established for monitoring control processes and control deficiencies are communicated to those responsible for taking corrective action and to senior management and the Commission, where relevant, in a timely manner. We can confirm that the following ongoing monitoring systems are in place:

- Key risks and related controls have been identified, and processes have been put in place to monitor the operation of those key controls and report any identified deficiencies
- Reporting arrangements have been established at all levels where responsibility for financial management has been assigned
- There are regular reviews by

the Commission and senior management of periodic and annual performance and financial reports which indicate performance against budget and forecasts

### Procurement

We confirm that during 2024 the CCPC had procedures in place to ensure compliance with current procurement rules and matters arising regarding controls over procurement are highlighted under internal control issues.

### Review of Effectiveness

We confirm that the CCPC has procedures to monitor the effectiveness of its risk management and control procedures. The Commission's monitoring and review of the effectiveness of the system of internal control is informed by the work of the internal and external auditors, the Audit and Risk Committee which oversees their work, and the senior management within the CCPC responsible for the development and maintenance of the internal control framework.

### Internal Control Issues

We confirm that the Commission conducted an annual review of the effectiveness of the internal controls for 2024. The Statement on Internal Control has been reviewed by the Audit and Risk Committee and the Commission to ensure it accurately reflects the control system in operation during the reporting period. The Commission is reasonably assured that the system of Internal Control instituted and implemented in the CCPC for the financial year ended 31 December 2024 is effective.

No internal control issues were identified during the year.



# Appendix Three

## Public Sector Duty

The importance of a values-based approach to the public sector duty of the CCPC, under the Irish Human Rights and Equality Commission Act 2014, is mirrored in the way we place an emphasis on it in our plans, goals, mission and the behaviours of our staff.

We ensure that links between human rights and/or equality statements and related action plans are incorporated into the CCPC work practices and we have a number of policies and procedures to promote equality and human rights and to support our staff.

### Equality of Access to Information

Equality of access to information is fundamental to the services we provide. We are committed to diversity and will ensure that the right to equal treatment as established by equality legislation is upheld. We aim to ensure equality of access through services provided by phone and online. We communicate in Irish and Irish Sign Language, on request, and publish major documents, such as our annual report, in Irish and English. The Accessibility Statement on our website details our progress in implementing the recommendations of the 2021 website accessibility audit of our websites. Our Access Officer arranges supports for people with disabilities who access our information and services.

### Disability Liaison Officer

Our CCPC Disability Liaison Officers (DLOs) act in confidence and play a key role in supporting and advising staff and management on work supports that may be required following a declaration of a recognised disability as set out in Section 47(1)(a) of the Disability Act

2005. We encourage all staff to disclose their disability in confidence on commencement of their role and throughout their career in the CCPC. The services of the DLOs are highlighted to new staff during their induction and are promoted to all staff on a regular basis

To enable the provision of an effective and efficient Disability Liaison service, the DLOs:

- Act as a point of contact for members of staff with disabilities and their managers
- Provide reasonable workplace accommodations, advice, suggestions, guidance, relevant information and appropriate contacts
- Assist in the implementation of best HR practices in line with equality legislation including the collection, maintenance and reporting of data in compliance with Part 5 of the Disability Act 2005
- Promote increased awareness of disability throughout the CCPC

### Promoting Equality and Human Rights in the Workplace

We undertook a number of initiatives to promote equality in the workplace during 2024. In June, to recognise PRIDE 2024 employees were given the option to use the approved

CCPC Rainbow email signature and lanyards to show their support of LGBTQ+ communities. We also hosted a session by ShoutOut entitled "Inclusive Homes: Parents & Guardians".

Among other wellness initiatives, we also organised events to recognise International Women's Day 2024, National Diversity and Inclusion Day, International Men's Day 2024 and Menopause awareness and support.

### Safety Statement

We are committed to protecting the staff, contractors and subcontractors working in the CCPC. We aim to achieve this commitment through the implementation of effective safety management initiatives and the application of this Safety Statement. The objectives of this Statement are to:

- Promote standards of safety, health and welfare that comply with legal requirements
- Provide staff with sufficient information to allow them to work safely and efficiently
- Enhance safety awareness among staff
- Define the responsibilities of all staff for safety and health matters

### Employee Assistance Service

We support our staff by offering an Employee Assistance Service. This confidential service provides counselling, support and stress management for staff for both work and non-work-related issues.



# Appendix Four

## European Consumer Centre Ireland

### ECCI

The Department of Enterprise, Trade and Employment designated the Competition and Consumer Protection Commission (CCPC) to host the European Consumer Centre Ireland (ECCI) from 2024 - 2028. ECCI is part of the ECC Network

(ECC-Net) that empowers consumers to know their cross-border rights and take full advantage of the Single Market. The ECCI service (hosted by the CCPC) started on 1 January 2024, with the ECCI website providing information to consumers

in Ireland on their cross-border rights. From 1 April 2024, consumers could also use the website to ask a question or submit a complaint to the ECCI case handling team.

### What we do

Irish consumers can visit the ECCI website ([www.eccireland.ie](http://www.eccireland.ie)) to:

- Find information about their cross-border rights
- Use templates to contact a business about an issue
- Ask for advice about a specific situation
- Make a complaint about a business based in another EU country, Norway, Iceland and UK

The cross-border case handling service supports consumers by:

- Working with other ECCs to resolve issues on behalf of consumers based in Ireland
- Contacting Irish businesses to resolve issues for consumers based in another EU country, Norway, Iceland and UK
- Explaining the next steps to consumers when we cannot resolve an issue amicably with a business

### 2024 in numbers (1 April – 31 December)

#### Assistance to consumers



#### Top 3 complaints by economic sector

**Air Travel - 44%**

**Clothing and Footwear - 20%**

**Car Hire - 11%**

Co-funded by the  
European Union



Help and advice  
for consumers  
in Europe







Competition and Consumer  
Protection Commission

Bloom House, Railway Street,  
Dublin 1, D01 C576

Tel +353 (0)1 402 5500  
Consumer helpline 01 402 5555

**ccpc.ie**