



Association For Consumer Rights (Malta)

Official address: Volunteer Centre

181, Melita Street

Valletta, VLT 1129, Malta

Email address: associationforconsumerrights@gmail.com

Website: www.acrmalta.com

Annual General Meeting – Saturday 15th March 2025

Association for Consumer Rights Malta (ACR)

Annual Report 2024

The Association for Consumer Rights Malta (ACR) established in 2011, is an independent, voluntary, non-sectarian, non-political and non-profit-making organisation, based on adult, individual membership as defined in the Voluntary Organisations Act, (Chapter 492) of the Laws of Malta.

ACR is committed to safeguard the interests of consumers in Malta in all aspects. Through its links, ACR is in a position to ensure consumers have the necessary information and skills when dealing with National, European and International developments of consumer affairs.

AGM for 2023/2024 was held on the 2nd March 2024 at the MCCA offices, Blata-I-Bajda.

Approved ACR Executive Committee 2024/2025

President - Ms Pauline Azzopardi, B.Sc. (Hons), F.C.I.I., PFS (Cert.) Chartered Insurer

Vice President - Cynthia Busuttil and ACR FB Adm.

Hon General Secretary - Ms Grace Attard MQR, EESC CCMI delegate

Deputy General Secretary – Catherine Camilleri - Sustainability, Environment, Consumer Sector Representative, MCESD Civil Society Committee

Hon Treasurer – Eugenie Grech

Members' Secretary - Marilyn Muscat Rubio

Meeting of the Executive Committee

Various ACR Executive Committee meetings were held between March 2024 and February 2025. The ACR Executive Committee met six times and in addition held a number of online meetings. During this same period, the Annual General Meeting 2024 was held at MCCA offices, Blata I- Bajda.

Reaffirmation of Policy (from 2023 and 2024)

The following Resolutions from previous years were followed in 2024 given their ongoing importance:

1. Empowering the Maltese consumers with information on their rights and responsibilities
2. Sustainable Repair and Durability of Products

3. Sustainable pensions in Malta
4. Address the Challenges of the Digital Future
5. Promote the involvement and participation of older people in society
6. Promote a more comprehensive and transparent surveillance system of pesticide residues in food sold in Malta
7. Promote sustainable consumption
8. A sustainable food labelling framework to empower consumers to make sustainable food choices
9. Promote Financial Literacy in Malta
10. Consumers and the Green Transition
11. Sustainability of Construction Works in Malta

ACR Budget Proposals 2024 submitted to the Minister of Finance

Every year, ACR makes budget recommendations to the Minister of Finance. The following were the Resolutions submitted to Government for 2024.

ACR Resolution 2024 on Textile Labelling Regulation - Grace Attard

ACR Resolution on Advertising through Influencers - the impact on consumer behaviour- Grace Attard

ACR Resolution Pensions and Financial Health- Pauline Azzopardi

Civil Society Support and Funding in the area of Fundamental Rights, Rule of Law and Democracy- Grace Attard

Promoting Sustainable Consumption 2024 Resolution - Catherine Camilleri

Resolution 2023-2024 Subsidies For Private Health Care for Residents In Malta- Cynthia Busuttill

Safeguarding Consumer Health Through Less Pesticide Use and More Pesticide Residue Testing -Catherine Camilleri

Annual report by ACR General Secretary Grace Attard (EESC/CCMI delegate) submitted during 2024-2025

EESC/CCMI

Grace Attard is currently a delegate representing consumers on the EESC/Consultative Commission on Industrial Change CCMI which is made up of representatives of a wide range of Industrial sectors and delegates representing various sectors of Civil Society organizations, including youth, the elderly, women, consumers among others, as delegates.

She participated in the published Opinions of the CCMI. On the 2nd September the Draft Opinion entitled "From waste plants to resource plants" was published and on the 15th October 2024 the Draft Opinion entitled "Industrial changes in the health sector in the face of multiplying crises" was published.

ANEC

Grace Attard is a member of ANEC, the Voice of the European Consumers in Standardisation representing ACR. Grace works in the ANEC Digital Society Working Group, the ANEC Accessibility Working Group and also in the ANEC Sustainability Working Group.

Some of the Conferences attended

The Conference of the Civil Society Organisations' Group on 'Strengthening civil society and participatory democracy in the EU: the way forward', Brussels, 25th March 2024.

The General Secretary attended this conference organised by the Civil Society Organisations' Group of the EESC. Taking place shortly before the European Parliament elections, the event explored how the EU can work towards achieving effective sustainable civil dialogue and participatory democracy and continuing to lead on civil society engagement and defending civic space in the coming EU term of office.

The 35th ANEC General Assembly, Bruzzels, 11-12 June 2024

The Euromed Summit of Economic and Social Councils and Similar Institutions Malta, 18-19 June 2024.

This annual conference provides civil society organisations (CSOs) from the Euro-Med Member States with a platform to debate common challenges and opportunities and to exchange best practices. The event gathers around 120 participants, notably representatives of a wide range of CSOs from the Euro-Mediterranean region, EU and MENA government representatives, guest speakers and representatives from embassies and the media. The 2024 summit was dedicated to:

- Youth involvement in social and civil dialogue in the Euro-Mediterranean region (main topic)
- Climate change and water politics: Empowering Youth, Women, and Indigenous and Local Communities
- Migration and skills: improve the recognition of skills and access of migrants to trainings and apprenticeships

Transparency Register

ACR is on the EU Transparency Register which has to be updated annually every December with the activities of ACR. The President and the General Secretary are responsible to update this. The transparency register is a database that lists organisations that try to influence the law-making and policy implementation process of the EU Institutions

Annual report by ACR President Pauline Azzopardi

President is currently a Member of EOPA OPSG 2020-2025 and was a member of EIOPA IRSG 2020-2024

The President was a member of the EIOPA Insurance and Reinsurance Stakeholder Group (IRSG) from 2020-2024 and a member of the EIOPA Occupational Pensions Stakeholder Group (OPSG) from 2020-2024 and has been re-elected in July 2024 from 27 Member States to be member of OPSG for another 4 years. As a member she attends meetings mostly online where discussions are raised on legislation that deal with insurance and pensions in Europe.

The last IRSG meetings were held on the 28th February 2024 (online) and 23rd May 2024 (Frankfurt) and these covered topics: Value for Money, Retail Investment Strategy, Outlook for 2024- the challenges, risks and opportunities for both industry and consumers, Prudential treatment of sustainability risks, Joint ESAs work on the revised SFDR RTS EIOPA, Consumer Trends and Costs and Past Performance, Diversity, Equity and Inclusion from a consumer perspective and Reassessment of NatCat modules in the standard formula. The President delivered a presentation on “The CMU and the role of insurance” which was followed by a discussion.

OPSG online meetings were held on the 25th March and 12th June 2024, both online. Topics covered sustainability/SFDR, ACP issues, DORA policy products, Pan European Personal Pension Product PEPP, IORP liquidity risk management, European Pensions Dashboard pilot, CMU, ACP, Potential Pan European Occupational Pension Product (PEOP), low-interest rate environment effect on pensions, Consumer trends and costs and past performance of products.

An introduction meeting was held in Frankfurt on the 5th September 2024 where the Digital Operational Resilience Act was discussed. An online meeting was held on the 24th October where the EIOPA Staff Paper on the future Pan-European Pension Product EIOPA which was published in September was discussed. An online meeting held on 23/1/2025, discussed the SFDR revision, developments in the EU pensions markets; the pension systems reform in the Netherlands and Pensions adequacy and DC blueprint.

President is a member of the EU Consumer Policy Advisory Group

CPAG brings together representatives from consumer organisations, civil society and industry in support of the New Consumer Agenda, to regularly review progress achieved and reflect on priorities in the year ahead as input into the Consumer Summit discussions.

The President as representative of ACR was invited on the 18th April 2024 to attend the Consumer Summit in Brussels on the 18th April 2024. Catherine Camilleri, Deputy General Secretary attended.

The President attended online the Consumer Policy Advisory Group meeting 28th November 2024. The agenda included OECD study on sustainable consumption, the Consumer Agenda on Sustainable consumption, Consumer Data, Digital Fairness Fitness, E-commerce platforms originating from 3rd countries and Consumer Enforcement Initiative.

In May 2024, ACR was accepted as a member of BEUC, the umbrella group for 44 independent consumer organisations from 31 European countries. In May 2024, the President was invited to attend the General Assembly of BEUC. In this two-day conference held in Lisbon on the 28th May 2024, ACR was to be voted for acceptance as member of BEUC by the members. Deputy General Secretary Catherine Camilleri attended in her stead. ACR is now a full member for a period of one year. This membership is valid until the next GA meeting scheduled on 15-16 May 2025.

The President distributed information from BEUC received on the 2nd September 2024 to each ex- com member so that each committee member can set up a BEUC account and receive notifications of conferences and workshops on topics they would be interested in. The President being interested on the financial aspects, attended the 23rd October 2024 meeting.

The President attended the half day National Conference on Volunteering 2024 “Giving Voice and Visibility to the Sector” on Saturday 4th May 2024. This conference was also attended by another 3 members of the Association – Grace Attard, Cynthia Busuttil, Eugenie Grech. Pauline and Eugenie attended the workshop “Increasing social added value in your organisation”. This workshop discussed practices to help attract volunteers into the NGOs.

Capacity Building Session for NGOs - Project Development and Writing- 3rd July 2024 – organised by SEM

This was an afternoon session at the Grand Hotel Excelsior Malta, Floriana and it dealt with ways how to apply for EU funds and respond to the questions on the forms. Servizzi Ewropej Malta SEM are willing to offer help should we need it when applying for any EU fund.

Speed Networking – Lija Bocci Club 15th July 2024 organised by the Malta CVS

The President attended this social gathering to network meet with other NGOs.

Climate risks in the financial sector, sustainable investment products, green loans and mortgages, climate risk insurance- 23 October 2024

The President attended this Workshop organised by BEUC on consumer protection and engagement in the climate transition from a financial perspective. European Supervisory Authorities and the European Central Bank presented their highly technical work on climate related topics.

Consumer Credit Directive - 29 November 2024

President attended this meeting which was a BEUC Workshop on the Consumer Credit Directive. Elena Brolis, Team leader at the European Commission (DG JUST) replied to questions on the CCD.

BEUC Survey

The President replied to a BEUC survey where 5 priorities were to be named for the BEUC Strategy 2026-2030. The 5 topics prioritised by ACR were:

- Consumers are protected against payment fraud
- Consumers have access to more sustainable transport options
- Consumers have easier access to insulation, heating decarbonization and retrofit solutions to save money in the long term
- Consumers have timely access to affordable, safe and effective medicines
- Consumers are protected against unsafe food products

ACR's Sustainability expert Catherine Camilleri also suggested the following as being among the most important and/or pressing:

- Consumers have REGULAR AND AFFORDABLE access to more sustainable transport options
- Consumers have easier AND AFFORDABLE access to insulation, heating decarbonization and retrofit solutions to save money in the long term (this inherently implies that consumers can switch easily to sustainable heating and cooling solutions)
- Consumers have timely access to affordable, safe and effective medicines and medical devices
- Consumers are protected against harmful chemicals in everyday products and in food items.
- Consumers are protected against discriminatory practices and unsafe AI and other emerging technologies

“The reason that these five issues are unfortunately needing urgent and top priority is due to the climate collapse underway which poses an existential threat for many people unless consumer choices become much more sustainable. In this sense, I think the issues relating to sustainability at this point need to be prioritised above other consumer issues. The topics I am suggesting are also strategic - in that BEUC would best prioritise topics crucial for the consumer but which may not be adequately prioritised by other EU institutions. For example, from what I understand, EU institutions are putting much effort already to regulate AI developments and to ensure that products from outside the EU comply with the standards set for products originating with the EU. However, because of the heavy lobbying by pesticide and chemical producers, EU institutions on their own are not really managing to protect consumer health through safe food...hence BEUC's pressure in this regard would greatly help.”

MFSA Survey on Financial Literacy completed by 17 January 2025

The President responded to a survey sent by the MFSA on the 18th December 2024. This topic had been one of the priorities of ACR work. The promotion of financial literacy is an issue the importance of which is recognised by all the stakeholders in the financial services sector, from regulators to operators, and beyond, including those in education and the social policy field. The MFSA believes that a financially literate consumer is an empowered consumer who can ask

the right questions to their financial services providers and who can make the right financial decisions. This survey will map, review, and analyse the effectiveness of existing financial education activities by relevant stakeholders in Malta to identify needs and gaps in the provision of financial literacy initiatives. ACR was selected to participate in this survey since it is considered to be an important stakeholder in the community.

Transport Malta finally replied to our email on the 25th November 2024

After three emails to the Transport Malta CEO where no reply was received, another one on the 18th November 2024 was sent to the new CEO Mr Kurt Farrugia asking him to respond to our questions. The President stated that we are very concerned with the state of our air due to polluting emissions from private vehicles as we wish to promote a healthy ambient air quality for people living in Malta.

ACR wished to see that there is monitoring of vehicle emissions and ensuring that polluting vehicles are identified, and appropriate remedial action is taken. Some important questions were asked and the following are the responses from Transport Malta.

1. How does Transport Malta currently monitor emissions from vehicles driven in Malta?

“The Vehicle Inspection Unit (VIU) conducts visual inspections on all vehicles stopped during roadside checks. Vehicles emitting excessive smoke are issued a contravention, while those with moderate smoke emissions are scheduled for an appointment at the VIU garage for testing using an opacity meter.”

1. Does Transport Malta have any equipment on the road that monitors and evaluates emissions of vehicles as they pass by?

“Transport Malta does not utilize any equipment during roadside inspections. The only device available is the opacity meter, which is stationed in the garage as it requires an electrical power source to operate.”

2. Does Transport Malta conduct spot-checks on vehicles while being driven on the road?

“Yes, as indicated in Reply No. 1, Transport Malta - (VIU) conducts visual inspections on all vehicles stopped during roadside checks. Vehicles emitting excessive smoke are issued a contravention, while those with moderate smoke emissions are scheduled for an appointment at the VIU garage for testing using an opacity meter.”

3. Is the SMS Emissions Alert system still operating i.e. sending SMS to 50611899? If so, how does it operate and what data is available regarding its operation in the last few years?

(How many vehicles were reported, summoned for a test and test results.)

“Yes, the SMS Emissions Alert System is still operational. Below is a summary of the process and statistics for 2022, 2023, and 2024, along with the respective outcomes:

- Members of the public send an SMS reporting potential vehicle emissions issues.*
- A designated person compiles and sends all the data quarterly to another designated person.*
- The data will be reviewed and forwarded to the VIU Manager.*
- The VIU issues letters to vehicle owners listed for emissions inspections.*
- The VIU oversees the inspection results and subsequent actions.*

Please find the statistics for 2022, 2023, and 2024 along with their results below for your review.”

SMS	CALLED	INSPECTED	PASSED	FAILED	NO SHOW
2024	227	118	89	29	109
SMS	CALLED	INSPECTED	PASSED	FAILED	NO SHOW
2023	482	211	117	94	271
SMS	CALLED	INSPECTED	PASSED	FAILED	NO SHOW
2022	114	38	26	12	76
SMS	CALLED	INSPECTED	PASSED	FAILED	NO SHOW

4. How does Transport Malta coordinate monitoring and regulation of vehicle emissions with other entities such as the Police?

Both the public and authorities can report vehicle emissions issues through the SMS Emissions Alert System. “

This information including the emissions alert phone number for sending SMS reports, were placed on ACR FB page.

Annual Report by Vice President Cynthia Busuttil as Facebook Administrator

The number of friends that follow the ACR face book page now stands at 3,400. Birthday greetings are sent when possible, to give a personal touch. Posts on our Face Book page aim to educate and instruct consumers on their rights and responsibilities. Some articles written by Odette Vella from MCCA are reproduced.

In 2024, several complaints were received by email which were addressed by either giving direct advice or, in serious circumstances, referred to the MCCA.

Annual Report by Vice President Cynthia Busuttil

Food Alerts, 6th Feb 2024

Vice President wrote to the *Food Regulation unit and the MCCA requesting that published food alerts in the media should offer the public instructions in case they have consumed contaminated food, over and above their rights as consumers, such as refund or compensation. On the 22.8.2024, we were pleased to see an improvement in the information given in the media to consumers.

The following information was included:

‘Consumers are advised not to consume this product. For further information, the public can contact the Health Inspectorate Services between 8:00 a.m. and 2:30 p.m. on telephone number 21337333 or by email admin.ehd@gov.mt’ eg:

https://www.maltatoday.com.mt/news/national/130731/health_warning_for_undeclared_ingredients_in_dulano_product

Bilateral Meeting 13th February 2024 Consumer Dialogue on the New Consumer Agenda, EU

ACR was invited to meet up with the EU Commission who was made up of Ms Isabelle Perignon Director for Consumers, Directorate-General Justice and Consumers and Ms Carina Tornblom EU Consultant. Vice President participated in this important dialogue along with other members of the committee where ACR proposed and managed to influence the EU Committee on a better outcome for consumers on the subject of repair, refund, re-use. This meeting was held at the MCCA. Full report on the next day conference to be found in 2024 Annual Report.

Consultation Meeting “The Reform of Voluntary and Not for Profit Sector (NGOs)” Hotel Excelsior, Floriana, 24th Feb 2024

Minister Farrugia Portelli, Minister for Inclusion and Voluntary Organisations, and Jesmond Saliba, Commissioner for Voluntary Organisations gave a presentation. Mr Saliba stated that there is the impression of wrongdoing among some NGOs. Looking from the operational perspective, one size fits all does not apply to this sector. The intention is to vet organisations at the gatekeeping i.e. entry. A certificate after vetting will give validity to the organization. 1,865 NGOs registered in Malta. Booklet submitted to ACR. Some interesting Questions and Answers from this meeting:

- FAA speaker implied that if the govt institutions performed their duties, they would not need to spend hundreds and thousands of euros on court cases.
- Why are there so many NGOs? Because the institutions such as MEPA and PA are failing to do their work.
- Why are businesses consulted against payment, but NGOs are asked for help for free?
- Repubblika asked to secure protection against attempts to shut them up in various ways.
- Sliema Residents Association Charles Falzon recommended to cut down on bureaucracy. Some participants objected to the three different categories being proposed.

A good suggestion was for all submitted accounts to be available online for transparency and for the public to view. NGOs are answerable to the public after all.

Notary & Estate Agency Fees, April 2024

In May Vice President proposed that ACR discusses the topic of professional fees charged by Notaries for searches on properties and fees charged by real estate agency fees. A percentage fee of the final price is no longer a fair system when taking into consideration the inflation of prices on property for sale and for rent vis-à-vis the professional work involved which has

basically remained the same. A Notary does the searches and ancillary work, an Agency introduces landlord to renter/buyer. What has changed is the price of properties and rents which have exploded. There has to be a new approach in the fees charged by these professionals to reduce the burden on purchasers and particularly renters. ACR will be working on this.

National Conference on Volunteering 2024, 4th May 2024

‘Giving Voice and Visibility to the Sector’ held at the Westin Dragonara Point Ballroom, St. Julian’s. Prof. Maura Pozzi, Associate Professor of Social at the Catholic University of Milano was key speaker. She discussed the contribution of VOs towards the community by providing a ‘social added value’ as perceived by volunteers and also by the community itself.

Prof. Suzanne Gatt presented the results of a research study related to Discrimination in the Voluntary Sector in Malta. Conference also included a panel discussion and workshops.

Observation: Vice President believes that it is near impossible to find volunteers in this sector partly because everyone is busy with work. While some parents with children switch to part-time work to cope with work and family, private schools are letting down the system by finishing too early. If private schools, similar to state schools, give a full day to children, for the same fee, the voluntary sector would benefit from people having more free time to offer. The hours have to be worked out so that children are at school longer than the present half day. This would mean longer ‘fun time’ for children and it would free up parents who would be in a better position to volunteer with an association that is close to their heart. Parents and individuals who volunteer their free time should receive some form of acknowledgement such as tax-breaks. However, a community is built on principles.

Up-date: A public discussion is currently underway on the topic of school opening hours. See Times of Malta: Align school opening hours with work schedules, study suggests Education Minister averse to longer school hours.

June Trade Fair Ta’Qali first ever participation on 28th -29th July 2024 6pm-11pm.

Vice -President encouraged the taking-up of a stand by ACR as offered by MCVS over two days to showcase the Association. She proposed the purchase of a banner and business cards for the first time, which will be useful during official encounters. These marketing materials were handled by Eugenie Grech. A handout was also prepared for any passers-by interested in ACR’s work.

On Friday 28th July, the Vice President was accompanied by Eugenie Grech and on Saturday 29th July she was accompanied by Marilyn Muscat.

MDMA Gummies, July 2024

<https://timesofmalta.com/article/mdma-sweets-removed-wolt-containing-dangerous-synthetic-drug.1094834>

I brought this issue to the attention of Odette Vella Director, MCCA in January 2024 which was ignored and when the article above was published, Vice President revived her concerns and wrote again in July 2024 for action. Odette Vella responded that they will discuss the matter internally and keep us informed. Caritas too has given a severe warning, read here “Caritas seeks ban on synthetic cannabis products sold in stores”

Residential Lifts

In a meeting with the MCCA in November 2023, we drew attention to the numerous breakdowns of lifts in residential blocks, with consumers being left stranded for an unacceptable period of time. Engineer Rudi Vella admitted that so far, the MCCA paid attention to the safety side of Lifts only.

Update: 22.8.2024: As a result of our meeting the MCCA has included a Q&A section on their website related to Lifts. We consider this to be a step in the right direction. Much more is needed to be done by the MCCA in this area.

Resolution 2024 Subsidy for private Health Care

This Resolution submitted by the Vice-President was approved in the 2023-2024 AGM and was sent to various officials for consideration in the next National Annual Budget.

Servizz bi Tbissima (SbT) 2024

Vice President sits on the Board of this initiative and attended a number of board meetings held at the MCCA offices or online to improve and tighten the rules in connection with the SbT. A successful Award event was held in November 2024 at The Palace Hotel. This year ACR President was invited to present one of the awards. Six categories of traders participated. A report can be read here: <https://mccaa.org.mt/news>

December 2024 Newsletter

Vice President drafted a second newsletter which was sent to members of the ACR in time for Christmas.

Marketing and Branding – Advanced Level 17 and 28 February 2025

Vice President attended this online course to better understand how we can promote our Association. Content covered Social Media Management, Marketing Strategies for NGOs, Content Creation and Management, Member Engagement and Growth,

Annual Report by Catherine Camilleri – ACR Deputy General Secretary, Sustainability and Consumption Matters, Consumer Sector Representative, MCESD Civil Society Committee

As consumer sector representative, during the year under review, Catherine Camilleri participated in eleven monthly meetings of the MCESD Civil Society Committee. In this role she primarily continued working on the below initiatives, through proposals and meetings with the relevant authorities:

- Promoting more reliable and efficient public bus services
- Proposals to ensure stronger food and water security in Malta
- Lobbying for grants to farmers who do not use pesticides for growing crops
- Lobbying for an Increase the rebate granted to compensate for payments made into private pension plans.
- Urging for improvements to make judicial processes more efficient and citizen friendly
- Promoting education curricula that are more context-based and applied.

On behalf of CSC MCESD, Catherine Camilleri also attended meetings with relevant stakeholders on main issues she focuses on, particularly, improving the quality of public transport in Malta.

As a CSC member Catherine Camilleri additionally submitted feedback on various national policy documents during their public consultation stage. A summary of the main submissions made is given below.

Submissions re Government's Proposed Education Strategy for 2024 - 2030:

The draft Education Strategy proposes three pillars which are deemed very valid. However, these strategy proposals need to be accompanied by more meaningful concrete action plans and specified time frames set for aimed milestones.

Re Proposed Education Strategy Point 1:

It is very commendable that in the strategy, Government is proposing: "A revision of the syllabi and learning outcomes to address OVERLOAD and overlapping and promote deep learning and sustain long-term memory."

Information overload has been acknowledged by various administrations, but it has not been meaningfully resolved. This overload is making many students become frustrated, overwhelmed and driving them to drop out of school. Thus, the new Strategy needs to also set time-frames by when core subject curricula will be reviewed to remove such overload. In the digital-era students do not need to become information banks but need to be helped to **develop the skill and competences needed to apply such information.**

Re Proposed Education Strategy Point 2:

The Strategy commendably proposes the "Expansion of the Accreditation Unit to ensure that the more programmes offered after-school hours are accredited and quality assured. Rebranding of Klabb 3-16, SkolaSajf and Catch Up Classes to ensure accredited programmes are offered to students".

Feedback on this proposal:

The strategy needs to add tight timeframes for such accreditation with urgency, as in the meantime such after-school programmes are operating without accreditation.

Re Proposed Education Strategy Point 3:

Re the proposed "setting up of a Trade Institute, based on a micro-credentials system, for postsecondary students to promote careers in the traditional and modern trades"

Currently, provision of education in various trade skills is severely lacking, even if in the last few years vocational education has started to be introduced in secondary schools.

Most learning paths in trades are still skewed towards a theoretical writing-oriented approach. The result is that Malta has a lack of trained, qualified tradespeople. The strategy should therefore set out more applied learning opportunities. Moreover, all students should have basic courses in vocational subjects such as "Basic electrical works for homeowners." "Basic Woodworking" and "Basics of Plumbing". In this way, students would leave secondary school equipped also with a basic literacy in the skills required in one's home.

CSC Proposals submitted for Budget 2024 – 25

On behalf of the consumer sector, in October 2024, Catherine Camilleri submitted the following proposals for Government's consideration to include in upcoming budget.

PROPOSAL 1

Assign a meaningful grant to farmers who do not use pesticides for growing crops

The National Statistics Office's (NSO) 2020 census of agriculture key findings strongly indicate that farming in Malta is in steady decline. Notably, the number of agricultural holdings decreased by over 16% between 2010 and 2020. In 2020, over 80% of persons working in agriculture were 65+ years of age. Additionally, the utilised agricultural area (UAA) decreased by 6.2% in 2020 when compared to 2010.

To safeguard consumer health while at the same time supporting farmers and promoting national food growing security, the consumer sector urges government to give more generous grants to farmers who accept not to apply pesticides on their crops. Regular testing for pesticide residues in these crops would need to be also undertaken to ensure that pesticide-free farming is being upheld.

CONSUMER SECTOR PROPOSAL 2:

Offer a financial grant which refunds Maltese citizens aged 65 years and over, who take out a private healthcare insurance policy.

According to information given in Parliament by then Minister for Health, Dr C Fearne, in April 203, there were 1,573 patients who had been waiting longer than the time stipulated by the Patient Charter for their operations at Mater Dei.

According to the the Patient Charter, in urgent cases where the patient's health is in imminent danger but with no diagnosis of deterioration of health yet, medical intervention should start within 12 weeks. For less urgent cases which don't endanger the patient's health, the waiting period should not exceed 18 months.

To lighten the demand burden on national healthcare services, and to ensure that Maltese citizens do not suffer long waiting times for needed medical care, it is therefore being proposed that in the upcoming budget, government offers a grant of up to 500 Euros, to cover the cost of a medical insurance policy taken out by Maltese citizens aged 65 years and over.

CONSUMER SECTOR PROPOSAL 3

Increase the rebate granted to compensate for payments made into private pension plan.

Considering the rapid aging of the population, the old age and pensions gap presents one of the key challenges affecting consumers' financial health in Europe.

In Malta public pensions are both the main source of income for Maltese and an important component of public expenditure.

Many factors prevent Maltese from joining funded pensions as occupational pensions are nearly non-existent (only 3% of companies offer occupational pension) or because of their working situation, including fragmented careers, or just because of inadequate income that do not allow them to afford pensions contributions in addition to the public ones. Another factor is the high costs of private pensions which although they enjoy tax benefits but are still not popular.

Maltese citizens should contribute more to occupational pension plans and personal pension products to avoid falling into poverty in retirement.

Representing the CSC in MCESD fora held on public transport.

In these fora Catherine Camilleri consistently lobbied for the below improvements.

1. **Improve the accuracy and veracity of the live bus tracker on the Tal-Linja app.** (The launching of this live tracker is to be commended.)
2. When buses are delayed, **start showing their true arrival/departure on live tracker and on bus stop displays.**
3. **Introduce truly express buses.** For example, it is no use taking passengers who wish to go from Pembroke to Valletta, into St Julians and Sliema. Likewise, it is time-wasting for passengers wanting to go from Marsaskala to Valletta, to meander through Tarxien and Paola.
4. **Introduce mini-buses on frequent express routes.**
5. **Increase frequency of fast ferry services** between Valletta and the Three Cities, Sliema and Gozo. Satisfaction is often expressed about the punctuality and reliability of these ferry services.

6. **Introduce more ferry services** from Valletta and linking various points along the coast. Such as Bugibba to Sliema and Valletta.
7. **Bring more buses into operation** to alleviate overcrowding and so that departing buses don't have to wait for a bus to arrive first. Thus, if one bus arrival is delayed, the next departing bus does not have to leave late as well...
8. **Introduce financial reward for commuters scrapping their private vehicles** altogether. (Rewarding replacement of OCE with electric vehicles reduces air pollution but does not reduce the traffic on the road.)
9. **Undertake comprehensive feasibility study for a national underground metro.** (An initial blueprint for a national underground metro has already been drawn up by renowned Perit Konrad Xuereb, structural engineer & architect with over 25 years' experience in the design and execution of a wide range of international projects, including underground metros.)
10. **Set a staggered time for different types of vehicles to enter a certain zone.** For instance, can commercial vehicles deliver to shops and gas cylinder trucks enter after school transport has dropped or picked up students from schools in that area? This would particularly help in traffic hot spots such as Sliema.
11. **Require school vans to park in front of schools only within a certain designated time.** At times school vans arrive well ahead of school dismissal, and block part or all of the road.
12. All throughout the year, assign appropriately trained traffic management officials at most roundabouts, near schools and other traffic hotspot nodes. Such officials must actively manage traffic, not stay by the wayside and just intervene when there's an accident or to issue fines.
13. **Set up a unit dedicated to dealing with onsite requirements of traffic accidents,** so that such sites may be cleared as fast as possible to avoid traffic pile ups.
14. **Offer tax rebate or other financial incentive** to public service employees who accept to leave their car at home and instead commute to and from work on a mini-bus. Some pilot trials may be undertaken by gauging interest of civil servants residing in Mellieha and Marsaskala, and working in the Belt is-Sebh area.
15. Offer remote-working days for **jobs** that may be partially conducted remotely.
16. Ensure that hawkers and other traders do not obstruct a route. Sometimes these invite buyers to double park momentarily, especially by roundabouts.

Participation in discussion and submission of feedback on the Government's proposed Malta Labour Migration Policy, February 2025

The Civil Society Committee (CSC) Consumer Sector Representative supports the key objectives of the Government's proposed Malta Labour Migration Policy (MLMP), including:

- Avoiding an increase in pension age.
- Shifting investment incentives towards high-value projects.
- Focusing employment policy on skills development rather than job creation.

However, the CSC Consumer Sector highlights areas requiring strengthening and proposes the following measures:

A. Reducing Dependence on Third-Country Nationals (TCNs):

- Allowing Maltese retirees (60-65) to work part-time with a maximum 5% tax rate.
- Applying a 5% tax cap on income for all working pensioners to retain experienced workers.

B. Addressing High Turnover of TCNs:

- Introducing mandatory job retention periods for TCNs, particularly in healthcare (minimum five years).
- Applying minimum termination rate requirements to businesses with fewer than nine employees.
- Ensuring TCNs in healthcare are not exempt from these termination rate rules to reduce disruption in services.

C. Managing Public Resources:

- Requiring TCNs to work and contribute to National Insurance for at least five years before dependents qualify for free healthcare and education (excluding those married to or in a civil partnership with Maltese citizens).

D. Enhancing Quality of Life:

- Preventing a cycle of TCN recruitment solely for excessive apartment development, which contributes to overcrowding and declining living standards.

The CSC Consumer Sector reiterates that adopting these recommendations would ensure a more sustainable, high-quality labour migration policy that benefits both the economy and society.

Preventing notarial malpractice vis clients' moneys by asking the authorities to ensure adequate protective and remedial protection to the public, March 2025

In March 2025, Catherine Camilleri asked the MCESD Civil Society Committee to request the relevant authorities to take the needed measures to protect consumers in case of notarial malpractice. In recent years, various consumers have lost considerable amounts of money, when they paid deposit money on property being purchased or paid purchase tax to some notaries who unfortunately misused these monies. These consumers are still required asked to fork these moneys again by property sellers and Inland Revenue Department. For this reason, it would be opportune for the CSC to approach the authorities to ask that more preventive and indemnity measures be set in place to protect the public from such abuse. Some years ago the Ombudsman had recommended that the authorities set the required mechanisms so that notaries be required to set up a professional escrow account. Additionally, as in the case of protecting consumers' bank deposits, the Notarial Council would be assigned the responsibility of setting up a compensation fund on behalf of all notaries in Malta.

Need to improve the Domiciliary Care and Domiciliary Nursing services provided by Comm Care to senior citizens living at home.

In March 2025, the MCESD Civil Society Committee accepted Catherine Camilleri's request to initiate discussions with the Ministry for Health to ensure quality and reliability in the Domiciliary care and nursing services offered by the private companies delivering these services. These services are very important as they enable many senior citizens to continue living at home, while reducing demand on state care homes for the elderly. However, various senior citizens have given up on these services since these services are not by set appointment but provided at any time between 7.30am and noon. One day, the carer may turn up at 7.30 am but at noon on the next, to help wash and dress a client. This puts clients in a situation of great uncertainty, never knowing when they will be bathed and dressed. A number have reported that they ultimately try to wash and dress on their own, at risk of injuring themselves. When the carer arrives, they inform him/her that they don't need the service. Senior citizens in need of domiciliary care and nursing are amongst the vulnerable of our society and need to be adequately helped. It is a pity that a service which can provide independence is being implemented in a way that makes it unreliable and ultimately unusable for senior citizens at home. For this reason, the CSC's efforts to ask authorities concerned to help improve the delivery of this service would help our aged be able to live at home with dignity.

Other Work Undertaken obo ACR

REPRESENTING ACR MALTA IN EUROPEAN CONSUMER SUMMIT (17th -18th April 2024)

Key Discussions and Outcomes

The European Consumer Summit 2024, held in Brussels on 18 April, brought together 500 consumer-related stakeholders. Organized by the European Commission in collaboration with the Belgian EU Presidency, the summit aimed to gather input on key consumer challenges to inform future EU policies.

Key Themes and Discussions:

♦ Plenary Sessions:

- The EU's recent focus on the Green and Digital Transitions was highlighted.
- A signing ceremony saw 12 new businesses commit to the EU Sustainable Consumption Pledge, bringing the total to 21.

♦ Workshops:

Stakeholders provided input on six critical themes:

- 1 **Socio-Economic Inclusion** – Addressing the cost-of-living crisis, consumer protection in financial services, and the risks of digital exclusion.
- 2 **Sustainable Consumption** – Making sustainable choices easier and more affordable, fostering circularity, and integrating sustainability into consumer lifestyles.
- 3 **Digital & Advanced Technologies** – Strengthening consumer protection against deceptive digital practices, personal data misuse, and AI-driven risks. Ensuring human support remains available for essential services.
- 4 **International Consumer Policies** – Enhancing EU influence in global consumer protection, tackling cross-border infringements, and safeguarding EU consumers from unsafe products.
- 5 **Enforcement & Compliance** – Strengthening enforcement of EU consumer laws, improving cooperation across regulatory bodies, and ensuring legal certainty for businesses.
- 6 **A Fair Single Market** – Providing better tools for consumer rights awareness, addressing market fragmentation, and ensuring a consumer-centred EU policy approach.

♦ Next Steps:

The input gathered will guide the European Commission's upcoming consumer policy agenda, with an official report to be published.

REPRESENTING ACR MALTA AT THE BEUC MAY 2024 CONFERENCE IN LISBON

At the BEUC May 2024 Conference in Lisbon, member state participants emphasized that consumer protection is closely tied to defending democracy. Consumer organizations play a crucial role in safeguarding citizens' rights and ensuring fairness in the marketplace, particularly as consumers often feel unprotected against large-scale corporate interests.

Key consumer challenges identified included:

- Equal rights for consumers both online and offline
- Stronger protection for vulnerable groups (children, elderly)
- Digitalization and AI risks
- Cost of living crisis
- Climate change and plastic waste concerns
- Rising geopolitical tensions

Consumer organizations must support consumers in adapting to major shifts, particularly in:

- **Climate adaptation** – Governments must take primary responsibility for system-wide changes, rather than over-relying on individual consumer responsibility.
- **Collective redress** – Consumer organizations must act as watchdogs to prevent exploitation by legal firms.
- **Digital trust** – The use of personal data to manipulate pricing and services erodes consumer confidence.

UN Secretary-General António Guterres acknowledged the vital role of consumer organizations in advocating for sustainability and transparency.

Energy Transition & Greenwashing

The transition to renewable energy was a key topic, with discussions highlighting that renewables are now cheaper than fossil fuels, yet still face legislative and bureaucratic barriers. Participants questioned why solar panels and other renewable solutions are not more widely implemented, particularly in urban areas.

Concerns were raised about the misuse of environmental claims (greenwashing), and BEUC aims to ensure that regulations like the Green Claims Directive lead to genuine sustainability improvements rather than corporate collusion.

Future Action

Consumer organizations must expand alliances for transparency, prepare consumers for economic and environmental shifts, and push for systemic change in energy policy. Ensuring renewable energy is accessible and practical remains a top priority, alongside protecting consumers from misleading green claims and unfair digital practices.

Catherine Camilleri urged BEUC to ensure that producers make the repair of an item an affordable and realistic option for consumers. BEUC representatives agreed to lobby for this.

ACR Press Releases

10th July 2024

The Association for Consumer Rights encourages constructive dialogue to ensure any legal amendments involving psychologists uphold public safety and consumer choice

In response to the proposed amendment aimed at broadening the qualification criteria for psychologists, ACR Malta strongly encourages policymakers and the Malta Federation of Professional Associations and the Chamber of Psychologists to engage in constructive dialogue and ensure any legislative amendments not only safeguard the integrity of the profession but also protect consumers and public safety.

The key areas which must be agreed on are:

1. **High Standards:** Any proposed changes must not dilute the rigorous standards currently in place. It is important that psychologists have the necessary training and qualifications to practice and uphold the profession's credibility and effectiveness.
2. **Public Safety Risks:** Ensuring that psychologists have comprehensive and specialized training is crucial for public safety. Any legislative changes must safeguard the rights of vulnerable persons seeking mental health care.
3. **Professional Integrity:** Maintaining high standards is essential for preserving the integrity of the psychology profession. Any proposed amendment should not erode these standards or diminish trust in psychological services and professionals.
4. **Protect consumer choice:** The entry of appropriately qualified and experienced persons even if such qualifications or experience were obtained from overseas must be made legally permissible. In this way the consumers' right to choice would be protected and upheld.

The Association calls on policymakers to work with the Malta Federation of Professional Associations and the Chamber of Psychologists to engage in a thorough discussion and review the proposed amendments to ensure both accessibility to the profession and the maintenance of high standards. We advocate for solutions that on the one hand address the need for more psychologists in Malta, the right of consumers to choice in services without compromising the quality of care provided to the public.

ACR Malta however favours amending the law to permit warranting persons who have obtained the necessary equivalent qualifications from educational Institutions other than University of Malta. In this way, the law will establish a fair legal playing-field for all suitably qualified persons. ACR also urges stakeholders concerned not to oppose amendments to the law as a way of keeping high fees through a closed shop system.

As consumer representatives, we also ask to be included in government's consultation process on amendments to the laws relating to this issue.

The Association for Consumer Rights Malta was established in 2012 to protect the rights of the consumer. For more information, please contact: The President ACR Malta, associationforconsumerrights@gmail.com

Collaboration with the Malta Competition and Consumer Affairs Authority (MCCAA)

ACR has established links with Odette Vella Director Information, Education and Research, Dr. Phyllis Bezzina Director of Complaints and Reconciliation, and with Grace Stivala MCCAA Director General on Consumer Affairs. ACR keeps a record of all the MCCAA information material compiled by Odette Vella on The Sunday Times issue for dissemination to members. ACR makes it a point to meet the MCCAA once a year to discuss matters of concern that deal with consumer topics.

A meeting was held at MCCAA offices on the 4th October 2024. Present for this meeting were Ms Pauline Azzopardi ACR President, Ms Cynthia Busuttil ACR Vice President, Mr Paul Busuttil, ACR adviser, Ms Eugenie Grech ACR Financial Secretary, Ms Grace Stivala, Director General Consumer Affairs, MCCAA, Dr Phyllis Bezzina Director Complaints and Reconciliation, MCCAA, Ing Rudie Vella Head of Technical Standards Division, MCCAA, Ms Bernice Farrugia Head of Safety Standards, MCCAA. An information email was sent to all ACR members and also published on the website and FB.

Topics of Complaints received by the Association

The Association regularly receives a number of queries and complaints on various products and services by phone or email. These have been dealt with by Grace Attard, ACR General Secretary, Pauline Azzopardi President but most of them were handled by Cynthia Busuttil Vice-President. First advice given is how to deal with the complaint, ensuring they know the details of the guarantee provisions, especially the expiry date encouraging consumers to contact the seller and try to reach an amicable agreement. This is followed by explaining the rights of consumers in the different situations. Very often an agreement is reached and if not, there is always the need for further action, sometimes through MCCAA. Some complaints were complicated and were referred to MCCAA.

Unfortunately, one payment to a Birmingham car seller turned out to be a scam. President contacted APS Chairman and this was dealt with immediately. Yet bank found out that money was actually paid properly but it was a scam. President advised consumer to contact ECC even though this deals only with cross border in the EU member states and not UK.

A consumer complaining about cables on his roof was given online links to information and asked to wait from GO for their responses. The topics covered were intercom, Nespresso machine capsules, carpet, BCRS scheme charge in restaurants, plumbing issues, Enemalta service, washing machine, flight cancellations and hotel expenses. One was from the police asking ACR advice on illegal commercial activity, Atlantic Water heater' request for product replacement, defective front door purchased- Request for remedy- Security Service Malta Ltd, Fiscal receipt lottery- Suspicion of fraud, Air ticket from Universal Air. Denied boarding on arrival, Damaged tracksuit from Sarto, Unsatisfactory refund from Kind's Auto Sales Ltd, Unsatisfactory service from The Atrium (Dyson Malta), Exorbitant W&E bill from landlord,

Inconclusive delivery of full kitchen from Sicily, SUB-MATIC SRL Probes control box, Claim of faulty water box.

From the nature of the complaints received in the mail, it is evident that consumers need to be empowered with information that will help them reach the desired solutions. Several issues can be resolved quickly if all concerned acknowledge their responsibilities. We believe that the MCCA should become more demanding of traders' standards, offer more education to both traders and consumers, and to be bolder by recommending stronger laws for the protection of consumers.

Conclusion

I thank our President and all the Executive Committee members whose commitment to the Association has been crucial to the development of the ACR initiatives in the past 13 years.

We urge all our members to support us in our work.

We are sure that you all have a wealth of ideas and talents to offer for the benefit of society

Thank You

. "We lose the precious sense that an end is only a beginning in disguise."

—Craig D. Lounsborough

Pauline Azzopardi

President

Catherine Camilleri

Deputy General Secretary