

26 July 2023

To whom it concerns,

As you will be aware, since the introduction of the *European Union (Requirements to Indicate Product Prices) (Amendment) Regulations 2022 (Amending Product Pricing Regulations)* on 29 November 2022, businesses in Ireland have had certain obligations around the advertising and display of price reductions.

The Competition and Consumer Protection Commission (CCPC) has engaged with businesses to inform them of their obligations and created a number of resources, including a guidance booklet and a set of regularly updated online FAQs, to assist businesses in adapting to the regulations.

As the enforcement body for these regulations and other consumer protection legislation, the CCPC undertakes market surveillance to inform its future compliance activities. In late 2022 and early 2023, the CCPC conducted an analysis of pricing data from a number of websites.

Through this analysis we uncovered a number of concerning pricing practices indicating that some traders had not yet changed their practices around price reduction announcements following the introduction of the new regulations.

Some of the issues we found included:

- not using the lowest price applied to the product in the previous 30 days before the price of the product was reduced,
- indicating a previous selling/prior price in a price reduction advertisement which never applied to the product in question,
- indicating a recommended retail price only and presenting this price as having previously applied to the product in question.

We are aware that businesses have started to put in place marketing plans for their seasonal sales, particularly around Black Friday and Christmas. In light of this, we will tomorrow publish an update to businesses (attached) to advise them that our focus is now moving from engagement to monitoring compliance. Sales pricing is now an enforcement priority for the CCPC.

We continue to offer resources to help businesses understand their obligations. A copy of our Price Reductions Business Guidelines booklet is attached, along with specific examples of the concerning practices that we found in our analysis. These resources and a number of Frequently Asked Questions submitted by retailers and answered by the CCPC can also be found at ccpc.ie/reductions.

I would appreciate it if you could circulate this information to your members.

Yours sincerely,



Grainne Griffin
Director of Communications
Competition and Consumer Protection Commission (CCPC)