

**Written evidence submitted by Consumer Council for Northern Ireland, relating to the
operation of The Windsor Framework
[OWF0020]**

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1. Introduction

This is a briefing submitted by the Consumer Council for Northern Ireland (Consumer Council) to the Northern Ireland Affairs Committee regarding their inquiry into 'The Operation of the Windsor Framework', ahead of the oral briefing to the Committee on Wednesday 12 March 2025.

- 1) The evidence in this briefing has been drawn from the Consumer Council's portfolio of consumer research and our engagement with partners in government and civic society. This covers the following areas of the inquiry:
 - a. The operation of the Windsor Framework to date.
 - b. Not-for-EU labelling and parcel movement requirements.
 - c. Customs procedures and movement of goods and agri-foods Great Britain (GB) to Northern Ireland.
- 2) We do not have any evidence in relation to the following areas of the inquiry:
 - a. The operation of the Stormont Brake and applicability motion procedures under Articles 13(3a) and 13(4).
 - b. The United Kingdom (UK) Internal Market Scheme and NI Retail Goods Movement Scheme.
 - c. Areas where legislative divergence between GB and Northern Ireland is likely to occur and the mechanisms in place to monitor or manage this.
 - d. Implementation and scope of the no diminution of rights commitment under Article 2.
 - e. The potential of Northern Ireland's dual market access.
 - f. Northern Ireland's access to EU funds.
 - g. The implementation of commitments contained within the Safeguarding the Union Command Paper.

Key points

- 3) Northern Ireland remains part of the European Union (EU) single market and customs union. To ease this transition, the Windsor Framework was established to cover three areas: ensure smooth trade arrangements within the UK internal market; safeguard Northern Ireland's place in the Union; and address the democratic deficit that was otherwise at the heart of the original Northern Ireland Protocol.
- 4) In 2022, the Consumer Council conducted research into the importance of the consumer to the Northern Ireland economy¹. This found 64% of economic output was driven by consumer spending, so consumer confidence is dependent on consumer spending, and confident consumers will drive economic prosperity.

¹ [The Importance of the Consumer to the Northern Ireland Economy | Consumer Council](#), December 2022

- 5) The Consumer Council's foundational statute in consumer affairs deals with how (and when) consumers access markets, their rights for goods and services, and the protections and standards that come with these rights. When it comes to the Windsor Framework, our focus is therefore to ensure the consumer voice and impact is duly considered when looking at trade arrangements within the UK internal market.
- 6) Since 2021, when the UK left the EU's single market and customs union, we have had new trade arrangements and grace periods of final arrangements, the COVID-19 pandemic and the worst cost-of-living crisis in recent history. It makes it very difficult for consumers to identify the nature and extent of how their lives and livelihoods have been affected by one, or a combination of these significant events.
- 7) Consumer confidence has been impacted since 2021, as we experienced the highest inflationary pressures in 40 years leading to unprecedented increases to the cost of borrowing, energy, food and fuel, exacerbated by supply chain disruption. It is important to remember that while the crisis has eased, falling inflation does not mean prices are falling, just that prices are rising more slowly than before.
- 8) The Consumer Council has provided evidence of the consumer position in Northern Ireland, including household income and expenditure, and consumer sentiment. This clearly demonstrates how higher cost of essentials such as food, utilities and transport costs are now baked into our economy, and the disproportionate impact on lower earning households who spend over half their household income on these essential costs.
- 9) We have also provided evidence of experiences and perceptions of EU Exit over a four-year period, the impact of (new) legislation and processes on consumers, such as parcel movements, alongside our monitoring of retailers not delivering to Northern Ireland, and consumer online shopping experiences. This lived experience of consumers brings to life the 'on-the-ground' impacts, both real and perceived.
- 10) The disruption to any supply chain, whether within the UK internal market or beyond, leads to higher costs throughout that supply chain which will eventually be passed on to consumers. It can also undermine the universality of our postal service and parcel movements, both of which support consumer confidence and spending, and economic activity.
- 11) This is the complex backdrop for the Windsor Framework. As the Windsor Framework is operationalised, it is vital consumers are central to future arrangements, and there are four parts to this:
 - a. First, to understand the effect on supply chains and trade flows.
 - b. Second, to evaluate and monitor the impact these will have on consumers in terms of their market access, costs that are passed down to them, and how this will affect consumer confidence.
 - c. Third, microbusinesses and sole traders make up c89% of our business base. Many of them often act in the same way as consumers in multiple markets, so understanding their needs is important.
 - d. Fourth, the need for better awareness and understanding of the first three points amongst the stakeholders across the ecosystem, and we have provided examples of our work in this space.

- 12) The Consumer Council uses eight guiding principles to assess and protect consumer interests and we recommend these are used by the UK Government to set the minimum standards for consumers when operationalising the Windsor Framework. They are:
- a. Access: Can consumers get the goods and services they need or want?
 - b. Choice: Is there any choice, or has there been a significant reduction in choice for consumers?
 - c. Safety: Can the goods and services consumers need be accessed safely and sustainably?
 - d. Information: Is the available information accessible, accurate and useful for all consumers?
 - e. Fairness: Are all consumers treated fairly or are some unfairly discriminated against?
 - f. Representation: Do consumers have a say in how goods and services are provided to them, directly or indirectly?
 - g. Redress: Is there a system or pathway for making things right when things go wrong?
 - h. Education: Are all consumers, including vulnerable groups, aware of their rights and responsibilities?
- 13) We cannot overlook microbusinesses and sole traders who make up 89% of the business base and act in similar ways to consumers, which can be very different from small and medium sized enterprises. The readiness and preparedness of all businesses is key to the successful operation of the Windsor Framework and there must be equal focus and effort invested in microbusinesses and sole traders.

2. Consumer position

Overview

- 14) Northern Ireland represents 2.7% of the total UK population (at 1.92M² vs 68.3M³) but has more than double the proportion of citizens living in rural areas at 36%⁴ compared to England (17.1%⁵) and Scotland (17%⁶). Population growth in rural areas between 2001 to 2020 outstripped urban areas by a factor of almost three to one⁷ (20% to 7%).
- 15) In 2022, the Consumer Council conducted research into the importance of the consumer to the Northern Ireland economy⁸. This found 64% of Northern Ireland's economic output was driven by consumer spending, so consumer confidence is dependent on consumer spending, and confident consumers will drive economic prosperity.
- 16) Northern Ireland has a higher proportion of lower income households reliant on social securities (70% vs 61%) and more households on less than £15,000 per year (22% vs 17%)⁹, who continue to struggle from the 'baked in' pressures of price rises.

Discretionary income

- 17) The Consumer Council has examined household income and expenditure since 2021, dividing all Northern Ireland c768,800 households into four equal income quartiles. The quarterly publication tracks expenditure and the areas they spend most of their money.
- 18) Our latest Northern Ireland Household Expenditure Tracker¹⁰, covering July to September 2024, has found:
 - a. Half of Northern Ireland households have less than £103 on average per week, after paying taxes and covering their essential spending.
 - b. Our lowest earning households have a weekly gross household income of just over £287, which is 6% lower than the UK average, and less than £52 per week after paying for essentials.
 - c. Food and non-alcoholic beverages have been the highest category of spend for Northern Ireland's lowest earning households for the last seven quarters.

Consumer sentiment

- 19) The Consumer Council conducts quarterly 'Pulse Surveys' with 1,000 consumers to monitor consumer sentiment and their financial circumstances.

² [2023 Mid-year Population Estimates for Northern Ireland](#), Northern Ireland Statistics and Research Agency, September 2023

³ [Population estimates for the UK, England, Wales, Scotland and Northern Ireland](#), Office of National Statistics, October 2024

⁴ [NI: IN PROFILE Key statistics on Northern Ireland](#), Northern Ireland Statistics and Research Agency, November 2022

⁵ [Statistical Digest of Rural England](#), Department for Environment, Food and Rural Affairs, October 2021

⁶ [Rural Scotland Key Facts 2021](#), Scottish Government, February 2021

⁷ [Key Rural Issues 2023](#), Department of Agriculture, Environment and Rural Affairs, February 2024

⁸ [The Importance of the Consumer to the Northern Ireland Economy | Consumer Council](#), December 2022

⁹ [Financial Lives 2022](#), Financial Conduct Authority, July 2023

¹⁰ [Q3 2024 Northern Ireland Household Expenditure Tracker | Consumer Council](#), February 2025

20) While there has been an improvement in the lived experience for some consumers, challenges remain. Our March 2025¹¹ publication found:

- a. 40% of consumers felt their household was worse off relative to 12 months ago, and 26% felt their household would be worse off in 12 months' time.
- b. While 93% of consumers were concerned about food prices, 69% were concerned about product availability/selection in shops and 71% about delivery options or charges for online products.

21) This research shows that consumers are already concerned about areas that could be impacted by the implementation of the Windsor Framework, particularly delivery options/charges and product availability.

¹¹ Cost of Living Pulse Survey | Consumer Council (To be published in March 2025)

3. The operation of the Windsor Framework to date

Northern Ireland consumers and EU Exit in 2024

- 22) Since March 2021, the Consumer Council has tracked the real and perceived impacts of EU Exit for consumers in Northern Ireland. By comparing the data over this period, we can observe how consumer attitudes and experiences have changed over time.
- 23) We use this research to track a range of consumer related topics to find out which areas consumers believe to be impacted by EU Exit. These include food, energy, travel, consumer rights and online shopping.
- 24) In addition, we review and refine research methodology every year to incorporate emerging areas of interest. This included Not-for-EU labelling (points 35-38), and consumers' experience of food that had shorter than usual use-by dates and shelf-life (point 54).
- 25) Our 2024¹² 'Northern Ireland consumers and EU Exit' research is a quantitative survey with a demographically representative sample of 1,000 Northern Ireland consumers, with a further four focus groups conducted in January/February 2024. This found:
- a. The top five concerns for Northern Ireland consumers relating to EU Exit were:
 - price increases
 - the economy of Northern Ireland
 - maintaining a frictionless border with the Republic of Ireland
 - introduction of custom checks
 - maintaining choice of retailers and products available in Northern Ireland
 - b. Consumers want more information with over four in five consumers wanting information regarding consumer rights and protection (82%) and goods and services (82%). Many respondents also wanted more information about food (78%), health (76%), travel (76%) and postal services (71%).
 - c. Over a four-year period, between 2021 to 2024, there has been an upward trend of consumers who feel that their rights are less well protected due to EU Exit, increasing from 32% in 2021 to 49% in 2024.
 - d. When asked about the impact of EU Exit on areas of common expenditure, consumers reported a negative impact on the following:
 - price of food
 - price of electricity/energy
 - cost of eating and drinking out
 - postal services and delivery
 - prices of holidays abroad, and
 - buying/running a car

These six areas have been consistent between 2021 and 2024.

¹² [Northern Ireland consumers and EU Exit: An overview of EU Exit experiences in 2024 | Consumer Council](#), December 2024

26) It should be noted that this research was conducted before much of the Windsor Framework implementation period, however it provides a useful baseline for charting consumer attitudes and concerns.

27) Further insights into consumer attitudes to food shopping in Section 5 (points 52-54).

Consumer representation and stakeholder engagement

28) As an insight-led evidence-based organisation, the Consumer Council has regular engagement with multiple stakeholders including the Northern Ireland Executive, UK Government and European Commission.

29) The Consumer Council's principal statutory duty is promoting and safeguarding the interests of consumers in Northern Ireland, by empowering them and providing a strong representative voice to policy makers, regulators, and service providers.

30) In relation to EU Exit, the Consumer Council representation and advocacy activities are extensive in Northern Ireland, the UK, and the EU.

- a. Our consumer research and insights inform our work with our sponsor Department, the Department for the Economy (DfE) and wider Northern Ireland Executive. We work with DfE to represent the Northern Ireland consumer position and inform discussions of potential consumer impacts with UK Government Departments, including HMRC and the Department of Business and Trade (DBT).
- b. We have direct engagement with senior UK officials and stakeholders responsible for key elements of the Windsor Framework implementation including HMRC, DBT, Royal Mail and Post Office, as well as the Foreign, Commonwealth and Development Office and UK Mission to the EU.
- c. We regularly share our research and insights with these NI, UK, and EU officials to ensure Northern Ireland consumers are considered in future policy development and decision making.

31) Alongside this we regularly:

- a. Share research insights to raise awareness and understanding of the Northern Ireland consumer position across government, regulators, and consumer bodies.
- b. Influence public policy by responding to government consultations to ensure the needs of Northern Ireland consumer are duly considered in policy decisions.
- c. Use our EU Exit research to engage with regulators where there are consumer impacts or concerns, for example, we worked with Ofcom to secure enhanced mobile roaming protections, which are particularly important for Northern Ireland consumers.

32) The Consumer Council is a member of the Northern Ireland Civic Working Group, established in 2021. This Group meets with civic society and senior officials in Northern Ireland Executive and UK Government Departments, including House of Lords European Affairs Sub-Committee and the European Economic and Social Committee. As a member, we offer our extensive portfolio of consumer research and use these insights to inform discussions about how arrangements are operating in practice.

33) Our role on the Northern Ireland Civic Working Group has resulted in membership of the recently formed Northern Ireland UK-EU Civic Working Group. This Group was set up in 2024 as part of the new structures for UK-EU cooperation set out in the Windsor Framework. Members provide expertise and insight from civic society to the UK-EU Co-chairs of the Specialised Committee. This engagement takes place quarterly, in advance of the Specialised Committee meeting, to ensure consumer and civic concerns are represented and considered.

The Northern Ireland UK-EU Civic Working Group also meets visiting UK and EU delegations when requested, to represent consumer and civic concerns. Recent engagements included the Minister for the Cabinet Office, The Rt Hon Nick Thomas-Symonds MP, where discussion topics included parcel movements, experiences of Northern Ireland consumers with retailers not delivering, and consumer attitudes.

34) The Consumer Council also engages in Europe through our membership of BEUC the European Consumer Organisation and is the only BEUC member to represent Northern Ireland consumers. We have worked with BEUC to amplify understanding of Northern Ireland's unique arrangements in Europe and recently attended the Civil Society Forum in Brussel between the EU and UK Domestic Advisory groups to provide insight into parcel movement experiences and concerns. We will look to develop this work in the future to ensure the Northern Ireland consumer position is represented in Europe.

4. Not-for-EU labelling and parcel movement requirements

Not-for-EU labelling

35) Following the introduction of Not-for-EU labelling which entered its first phase in October 2023, the Consumer Council introduced a question to see if consumers had noticed the labelling on products and in-store posters as part of the 2024¹³ 'Northern Ireland consumers and EU Exit' research.

36) At this point in time, Not-for-EU labelling only applied to meat and some dairy products, and the survey found:

- a. Almost half (46%) **had** noticed Not-for-EU labelling.
- b. 17% **had not** noticed them but were aware this labelling had been introduced.
- c. Almost a third of consumers (31%) **had not** encountered the labels and were unaware of their existence.

37) Looking at the data from our 2025 'Northern Ireland consumers and EU Exit' research, due for publication later this year, there has been:

- a. An increase in consumers **who have** noticed the labels (54%).
- b. A decrease in those who **have not** noticed the labels but are aware they exist (15%).
- c. A decrease in those who **have no** experience or awareness (24%).

The fieldwork for this research took place when Phase 2 of the Not-for-EU labelling implementation came in, as of 1 October 2024, and applies to all milk and dairy products.

38) It should be noted this research does not provide insight into whether Not-for-EU labelling is affecting product availability.

Upcoming Windsor Framework implementation on parcels

39) In January 2024, the Consumer Council commissioned research to understand the current experiences of Northern Ireland consumers who use parcel services¹⁴. This research was conducted with a demographically representative sample of 1,000 consumers. It explored consumer experiences of sending and receiving parcels from friends and family and online shopping with GB retailers, which is included in Section 5 (point 45).

- a. When receiving parcels from family and friends, two-thirds (66%) of consumers had received at least one parcel in the last 12 months. The origin of these parcels was most likely to be GB (48%), followed by Northern Ireland (30%).

¹³ [Northern Ireland consumers and EU Exit: An overview of EU Exit experiences in 2024 | Consumer Council](#), December 2024

¹⁴ Impact of EU Exit on consumers using parcel services | Consumer Council (To be published)

- b. While 66% of consumers had no issues receiving parcels from GB, 17% experienced delays, and 5% stated they were asked to pay customs duties or import fees.

40) In January 2024, the Consumer Council also commissioned research to understand the impact EU Exit has had on micro and small businesses in Northern Ireland who use parcel services¹⁵. This research was conducted with a sample of 500 micro and small businesses, and explored experiences of receiving parcels, buying goods and supplies, businesses' awareness of the Windsor Framework and the support they required. The research found:

- a. Royal Mail (45%) was the operator most likely to have delivered purchased goods, followed by Parcelforce (37%).
- b. About half (53%) of businesses received goods from GB in the last 12 months, 25% received goods from ROI, whilst 16% received goods from other EU destinations.
- c. 80% had not experienced issues when receiving parcels in the past 12 months, with 14% stating they have experienced delays with parcels from GB.
- d. Two in five (40%) businesses experiencing issues when buying goods from GB suppliers over the last 12 months felt they were caused by EU Exit. The most likely problems encountered were:
 - an increase in the cost of goods (23%)
 - delays with the delivery of goods ordered from suppliers in GB (17%)
 - GB suppliers no longer delivering to Northern Ireland (16%)
- e. The three most common reasons offered by those with experience of GB suppliers no longer delivering to Northern Ireland were:
 - increased paperwork (37%)
 - additional costs that could not be absorbed (26%)
 - new rules/regulations preventing suppliers sending goods to Northern Ireland (22%)
- f. Nearly three-quarters (74%) of those who had encountered GB suppliers no longer delivering to Northern Ireland had to seek new suppliers to compensate for this lack of delivery.
- g. Almost a quarter (23%) of micro and small businesses felt they would benefit from further information regarding current or future regulations for receiving or sending parcels to and from GB and the EU. Amongst those who felt they would benefit from further information:
 - around four in five (77%) would like to receive this via online hubs and websites
 - 46% would like online 'how to' video guides
 - 27% would like designated helplines or webchat
- h. Over half (53%) felt that couriers and parcel delivery operators were best placed to communicate this information, whilst 47% believed government agencies based in Northern Ireland were better placed.

¹⁵ Impact of EU Exit on small and micro-sized businesses using parcel services | Consumer Council (To be published)

- i. Around two-thirds (67%) of businesses were aware of the Windsor Framework. Amongst those that were aware of the Windsor Framework:
 - 61% claimed to know a little about the Windsor Framework
 - 23% stated they did not understand the Windsor Framework
 - About one in six (16%) claimed to have a good understanding of what it means for micro and small businesses buying goods from GB suppliers

41) New parcel arrangements established under the Windsor Framework are due to come into force from Monday 31 March 2025. It is the Consumer Council's understanding that:

- a. This introduces requirements for new data collection and data sharing arrangements which will rely on commercial data and technology to monitor the flow of goods between Great Britain and Northern Ireland.
- b. This will require parcel carriers to manage new processes of collecting data to share with HMRC in relation to parcels moving from GB to Northern Ireland in accordance with the arrangements agreed between the UK and EU.

42) Sending a parcel to Northern Ireland from GB will no longer be business as usual. While we have no evidence this will adversely impact parcel movements, the new arrangements have practical operational implications which must be managed. Our research has shown:

- a. Both consumers and businesses rely on Royal Mail for most parcels from GB, with Royal Mail holding the highest share of the courier market in the UK with a market share of 25% in 2023. Considering the new processes, it is incumbent on Royal Mail and Post Office to ensure parcel flows are not disrupted.
- b. Some consumers and micro and small businesses have experienced GB retailers, online marketplaces and suppliers not delivering to Northern Ireland, whether for commercial reasons, or directly as a result of EU Exit. While this has been an improving picture, care must be taken by all parcel carriers to ensure goods moving between GB and Northern Ireland are not adversely impacted.

43) In February 2025, Royal Mail consulted on proposed changes to the UK and Overseas Post Schemes¹⁶, which set out the key terms upon which Royal Mail provide their Universal Services, including changes in relation to the Windsor Framework. In our consultation response, the Consumer Council:

- a. Highlighted concern about a new clause 28.5 which states: *'There may be circumstances where we are unable to dispatch or deliver items or delivery may be delayed. This may be where the data provided is insufficient'*. We expect Royal Mail to monitor these instances to identify where the process is failing and work to rectify data collection activities so Northern Ireland consumers are not adversely affected.
- b. Northern Ireland consumers and micro and small business are reliant on parcel services, and we expect all parcel carriers to proactively make their staff and consumers aware of the new requirements. This means adequate information on the carrier website, knowledgeable staff at Customer Service Points and adequately trained staff across the Post Office Network. This is particularly important as insufficient data could result in the non-delivery of items to Northern Ireland.

¹⁶ [Consultation on changes to the UK and Overseas Post Schemes](#) | Royal Mail, January 2025

- c. It is unclear if the new arrangements will affect free 'collect in-store' options for Northern Ireland consumers or reduce choice of delivery options. As we are currently uncertain how the market will respond, the Consumer Council will continue to monitor this situation.

44) It should be noted, the Consumer Council does not have research insights on consumer and micro and small business parcel experiences prior to 2021.

5. Customs procedures and movement of goods and agri-foods Great Britain to Northern Ireland

Online shopping parcel experiences for consumers

45) In January 2024, the Consumer Council conducted research (due to be published later this year) which explored the parcel experiences for consumers after EU Exit¹⁷. This used a demographically representative sample of 1,000 Northern Ireland consumers. The research found:

- a. Almost all (98%) consumers had received at least one parcel at their home address in the last 12 months for goods they ordered online, with 76% receiving parcels of this kind at least monthly. These parcels were most likely to come from GB (72%).
- b. Royal Mail (92%) was by a significant margin the most likely courier/postal operator to have delivered consumer parcels in the last 12 months, followed by Amazon (70%), Evri (62%), then DPD (45%).
- c. The vast majority (95%) of consumers shop online, with the origin of goods bought online in the last 12 months most likely to be GB (80%).
- d. Almost half (47%) of consumers who shopped online had experienced GB online retailers no longer delivering to Northern Ireland, 38% had been asked to pay higher delivery fees, 24% experienced delays with delivery of goods, 16% experienced reduced product lines and 3% had been charged customs duties.
- e. Over half (58%) of consumers were:
 - offered no explanation why the online GB/EU retailer(s) would not deliver
 - 27% stated the retailer was unable to ship certain products
 - 26% stated the retailer informed them of additional customs processes and/or paperwork to deliver to Northern Ireland
 - 19% cited Brexit
 - 10% stated it was due to customs related issues
- f. Amongst those who had encountered a GB and/or EU online retailer no longer delivering to Northern Ireland, almost two-thirds (65%) were informed that their item could not be delivered while at the checkout stage, 31% were informed when checking item availability, whilst 27% were informed when adding an item to their shopping basket.

¹⁷ Parcel Experience after EU Exit | Consumer Council (To be published)

Consumer experiences of online marketplaces not delivering to Northern Ireland

- 46) In March 2023, the Consumer Council conducted research looking at consumers' experiences of retailers not delivering to Northern Ireland¹⁸, focusing on online marketplaces, with a demographically representative sample of 1,005 Northern Ireland consumers. This found:
- a. Just over three-quarters (76%) of consumers stated they have experienced online marketplaces which do not deliver to Northern Ireland with the most common product categories being home and furniture (40%), garden plants and seeds (38%), clothing and footwear (37%) and health and beauty (35%).
 - b. The most common online marketplaces cited were Amazon (73%); eBay (49%) and Etsy (19%).
 - c. In a significant number of cases, online marketplaces did not provide consumers with an explanation as to why items could not be delivered. When explanations were provided, this was typically the application of certain conditions such as weight restrictions or non-delivery of larger items to Northern Ireland.
- 47) More recently, we have seen an example of regulatory divergence affecting the ability of some micro and small GB businesses to sell to Northern Ireland consumers, particularly through online marketplaces. EU Regulation 2023/988 on General Product Safety (the GPSR) came into force on 13 December 2024, and this applies to Northern Ireland.
- 48) The Consumer Council has no statutory remit in relation to product safety. To date, we have received one enquiry from a GB business on this issue, which we passed to the Office for Product Safety and Standards, who enforces product safety in the UK.
- 49) To be able to report consumer impacts in line with our consumer protection principles, the Consumer Council has conducted limited monitoring. This has highlighted some areas of concern, but as these are not drawn from a demographically representative survey of GB businesses, they should be treated with caution. Key insights include:
- a. Online marketplaces have issued guidance to GB sellers on the GPSR requirements when selling to Northern Ireland.
 - b. Evidence of 50+ GB sellers expressing concern about complying with the GPSR requirements and stating they will no longer sell to the EU and Northern Ireland.
 - c. Many micro businesses are concerned about the cost to comply with the GPSR requirements, and the potential enforcement penalties.
 - d. Of the 50+ GB sellers no longer supplying Northern Ireland, key sectors affected include home and gifts, clothing and footwear, and sports and leisure.
 - e. We have met with representatives from DBT to share the insights from our limited monitoring, and to seek assurances for ongoing and enhanced communication and engagement with GB sellers, so they continue to serve the Northern Ireland market.

¹⁸ [Consumer experiences of retailers not delivering to Northern Ireland | Consumer Council](#), July 2024

GB retailers not delivering due to EU Exit

- 50) Since January 2021, the Consumer Council has monitored the number of GB retailers that have ceased to deliver to Northern Ireland citing EU Exit as the reason¹⁹. This data has been compiled using feedback from consumers between January 2021 to October 2024, and by conducting manual checks (undertaken by Consumer Council staff) on retailer websites to verify delivery status.
- In June 2021, we were aware of 289 GB retailers which had suspended delivery to Northern Ireland however this monitoring has shown an improving picture over time.
 - Our latest monitoring estimates between 86 to 97 GB retailers do not deliver to Northern Ireland who specifically cite EU Exit as the reason.
 - The product categories most impacted are garden products including plants and seeds (29%), food and non-alcoholic drinks (22%) and home furnishings including furniture (15%).
 - While the data is not statistically robust and is based on manual checks, it does provide some useful insight into the types of GB retailers citing EU Exit as their reason for ceasing deliveries to Northern Ireland.
- 51) The Consumer Council does not have any evidence in relation to the UK Internal Market Scheme and Northern Ireland Retail Goods Movement Scheme.

Consumer food shopping experiences

- 52) Food is at the forefront of consumer concerns in Northern Ireland.
- Our latest Pulse Survey, due to be published in March 2025²⁰, found 93% of consumers were concerned about food prices.
 - Our latest Northern Ireland Household Expenditure Tracker²¹, covering July to September 2024, found lowest-income households spent the largest proportion of their income on food and non-alcoholic drinks. This has been the case for seven consecutive quarters since Q1 2023.
- 53) Since 2021, complexities for food affordability and accessibility have included the COVID-19 pandemic, new trade arrangements and grace periods of final arrangements, the COVID-19 pandemic, and the worst cost-of-living crisis in recent history. It makes it very difficult for consumers to identify the nature and extent of how their lives and livelihoods have been affected by one, or a combination of these significant events.
- 54) Our EU Exit research, conducted in 2024, found most Northern Ireland consumers believe EU Exit has had a negative impact on the availability and cost of food.
- When asked specifically about their recent food shopping experiences:

¹⁹ [Overview note: Great Britain retailers not delivering to Northern Ireland | Consumer Council](#), October 2024

²⁰ [Cost of Living Pulse Survey | Consumer Council](#) (To be published in March 2025)

²¹ [Q3 2024 Northern Ireland Household Expenditure Tracker | Consumer Council](#), February 2025

- Almost four in five (78%) consumers attributed an increase in the cost of some goods to EU Exit
 - Just under two-thirds (65%) blamed EU Exit for certain goods no longer being available or having to make substitutes due to a lack of availability (64%)
 - A similar proportion (60%) reported having to go to alternative suppliers to get certain goods
 - 59% said they had needed to go without due to lack of availability
- b. In 2023 and 2024, over half (53%) of survey respondents had experienced shorter shelf-life with fresh food, which they believed to be caused by EU Exit. The food categories most frequently cited as having shorter shelf-lives than usual included:
- raw meat products (51%)
 - bread and bakery products (49%)
 - cooked meats (42%)
 - fresh vegetables (42%)
- c. Amongst consumers who said they were aware of shorter use-by dates on products:
- a quarter (25%) claimed they noticed this every time they shop
 - just under half (49%) claimed they spotted this most of the time
 - a further quarter (25%) noticed this occasionally
- d. Amongst consumers who are aware of shorter shelf-lives, over a third (34%) believed that the situation with shorter shelf-life of products would get worse over time, compared to 15% who felt that things would improve. Just over a quarter (27%) believed the situation would remain as it is.
- e. Over a third (34%) of consumers reported food price increases would place a strain on their finances, 29% said it would mean having to make cuts elsewhere in the household spend, whilst 14% said they would have to go without.
- f. While this research was conducted before the implementation of the Windsor Framework, it demonstrates that most consumers already consider EU Exit to have had a considerable impact on their food shopping.

55) From a fairness and choice perspective, and looking to our eight consumer protection principles, the Consumer Council would be concerned if implementation of the Windsor Framework resulted in manufacturers withdrawing products from the Northern Ireland market, or, if the added cost of production (such as labelling and logistical issues) resulted in a further increase to food prices.

56) We believe continuous monitoring and reporting of impacts on food supply chains from GB to Northern Ireland, is key to ensuring Northern Ireland consumers can access affordable, good, nutritious and enjoyable food, of an appropriate quality and quantity.

Annex 1

About the Consumer Council

The Consumer Council was established in April 1985 as a non-departmental public body (NDPB) under the General Consumer Council (Northern Ireland) Order 1984 (The Order). We operate under DfE, our sponsor department, on behalf of the Northern Ireland Executive.

We are Northern Ireland's statutory consumer body. Our extensive legislative underpinning covers consumer affairs, energy, transport, water and sewerage, post, and food affordability and accessibility. We also have a comprehensive brief for EU Exit and financial inclusion.

We champion Northern Ireland consumers, understand their needs, safeguard their rights and interests, and act as their trusted, independent voice. We represent all citizens but prioritise those who are disabled or chronically sick, are of pensionable age, are on low incomes and live in rural areas.

The Order

The Order sets out the Consumer Council's principal statutory duty as promoting and safeguarding the interests of consumers in Northern Ireland by empowering them and providing a strong representative voice to policy makers, regulators and service providers. Our main duties are to:

- Consider any complaint made to us relating to consumer affairs and, where it appears to the Consumer Council to be appropriate, having regard to any other remedy which may be available to the complainant, investigate the complaint and take such further action in relation thereto as the Consumer Council may determine.
- Carry out, or assist in the carrying out of, inquiries and research into matters relating to consumer affairs.
- Promote discussion of, and the dissemination of information relating to, consumer affairs.
- Report to a Northern Ireland Department on any matter relating to consumer affairs which is referred to the Consumer Council by that Department.

Rural needs and equality

We have responsibilities under the Rural Needs Act 2016 and Section 75 of the Northern Ireland Act 1998. In these roles, we aim to ensure government policies recognise consumer needs in rural areas and promote equality of opportunity and good relations across a range of equality categories.

Super-complaints

We are a designated super-complaints body set up under the Enterprise Act 2002 and the Financial Services and Markets Act 2000 Order 2013.

Under these Acts, the Consumer Council can, if we believe a UK market is, or appears to be, significantly harming the interests of consumers, raise a super-complaint on behalf of consumers to the: Financial Conduct Authority (FCA), Civil Aviation Authority (CAA), Office of

Rail and Road (ORR), Payment Systems Regulator (PSR), Competition and Markets Authority (CMA), Office of Communications (Ofcom), Office of Gas and Electricity Markets (Ofgem), Utility Regulator (UR) and Water Services Regulation Authority (Ofwat).

EU Exit

With regards to EU Exit, The Order gives the Consumer Council powers to monitor and report on the real and perceived impacts for consumers in light of Northern Ireland's unique position of being in the UK customs territory with access to the EU single market for goods, and the considerations of the NI Protocol and implementation of the Windsor Framework.

The Order allows us to educate and empower consumers to understand how any changes might affect them and what actions they need to take. Our work is also aligned to the following Articles of the NI Protocol:

- Article 4: Customs territory of the UK
- Article 5: Customs, movement of goods
- Article 6: Protection of the UK internal market
- Article 9: Single electricity market
- Article 11: Other areas of North-South cooperation

In considering "the interests of consumers" the Consumer Council is required to have particular regard to the interests of consumers:

- who are disabled or have long term health conditions
- who are of pensionable age
- who are on low incomes
- who live in rural areas

Postal services

Given the impacts of EU Exit on postal consumers, our statutory responsibility in this area is of relevance.

Postal services are a reserved matter, but the Consumer Council has certain functions in relation to postal services with the Department of Business and Trade as the sponsor Department, which funds our consumer advocacy work in Northern Ireland.

The Public Bodies (Abolition of the National Consumer Council and Transfer of the Office of Fair Trading's Functions in relation to Estate Agents etc) Order 2014 transferred National Consumer Council functions for consumer matters relating to post in Northern Ireland to the Consumer Council.

The Order transferred certain functions of the National Consumer Council under the Postal Services Act 2000, the Consumer Estate Agents and Redress Act 2007 and the Postal Services Act 2011, which are all UK acts. The Consumer Council thereby took on the functions of the National Consumer Council (which was abolished) relating to consumer matters in Northern Ireland for postal services.

We conduct research, influence policy, provide advice and information, and investigate complaints made by consumers in vulnerable circumstances, and this gives us the information gathering and investigation powers to help fulfil this statutory function.

Food accessibility

The Order gives the Consumer Council powers to research and report on the issues or barriers Northern Ireland consumers might face in accessing affordable, good, nutritious and enjoyable food, of an appropriate quality and quantity, to sustain an acceptable standard of living appropriate for all.

The Order also gives us powers to consider, report to and respond to consultations from the Department of Agriculture, Environment and Rural Affairs (DAERA) when and where appropriate for us to do so.

The Consumer Council also has a Memorandum of Understanding with Food Standards Agency (FSA) in Northern Ireland, and has regular engagement with senior officials, both locally and in GB. This enables us to monitor emerging issues such as regulatory divergence of food standards that could impact consumers. We work in partnership and share our respective research on issues of food affordability, accessibility and food insecurity.

Consumer protection principles

We use eight guiding principles to assess where the consumer interest lies, and to develop and communicate policies, interventions and support. These:

- Provide a framework through which we deliver our work and engagement.
- Serve to protect consumers by setting out the minimum standards we expect from all markets when delivering products or services in Northern Ireland.
- Frame our policy position and approach to addressing detriment, resolving disputes and analysing and validating outcomes, particularly amongst vulnerable groups.



Access

Can people get the goods and services they need or want?



Choice

Is there any?



Safety

Are the goods or services dangerous to health, welfare or sustainability?



Information

Is it accessible, accurate and useful?



Fairness

Are some or all consumers unfairly discriminated against?



Representation

Do consumers have a say in how goods or services are provided?



Redress

If things go wrong, is there a system for making them right?



Education

Are consumers aware of their rights and responsibilities?

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