



Checklist for consumer protection agencies deploying Artificial Intelligence

**UNCTAD informal working group
on consumer protection in
electronic commerce (WGE)**

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NOTE

This checklist was developed within the framework of UNCTAD informal working group on consumer protection in e-commerce,¹ as suggested by the working group members for the work cycle 2025-2026. The UNCTAD informal working group on consumer protection in e-commerce, established following a request by the UNCTAD Intergovernmental Group of Experts at its second session in 2017,² serves as a platform to promote the exchange of information, highlight best practices, and advance discussions on consumer protection in e-commerce, under the leadership of member States on a voluntary basis and without financial implications for the United Nations regular budget. Its mandate has been renewed annually by the Intergovernmental Group of Experts, to which it reports on its activities and outcomes.

Since 2023, the informal working group has been examining the implications of Artificial Intelligence for consumer protection. Three webinars have been held to discuss the risks consumers may face,³ the potential benefits for both consumers and consumer protection agencies,⁴ and practical examples of AI tools already deployed by agencies to support their work, enhance efficiency, and strengthen enforcement.⁵ Additionally, the WGE produced a technical note on Artificial Intelligence and Consumer Protection which is a recommended source to accompany this checklist.⁶

¹ <https://unctad.org/Topic/Competition-and-Consumer-Protection/working-group-on-consumer-protection-in-e-commerce>

² <https://unctad.org/meeting/intergovernmental-group-experts-consumer-protection-law-and-policy-second-session>

³ Available at: <https://unctad.org/meeting/webinar-artificial-intelligence-and-consumer-protection-risks-consumers>

⁴ Available at: <https://unctad.org/meeting/webinar-artificial-intelligence-and-consumer-protection-harnessing-tech-better-enforce>

⁵ Available at: <https://unctad.org/meeting/webinar-artificial-intelligence-deployment-consumer-protection-enforcement-authorities>

⁶ UNCTAD informal working group on consumer protection in e-commerce (2025). Artificial Intelligence and Consumer Protection. Available at: https://unctad.org/system/files/information-document/ccpb_artificial_intelligence_consumer_protection_en.pdf



INTRODUCTION

Artificial Intelligence (AI) is reshaping industries, economies, and governance at an unprecedented pace. For consumer protection agencies, AI offers both new opportunities and new challenges. On the one hand, AI tools can support authorities in detecting misleading practices, monitoring digital platforms, analysing large volumes of complaints, and targeting enforcement efforts more efficiently.⁷ On the other, the deployment of AI technologies raises critical questions about the respect of fundamental rights, transparency, fairness, accountability and environmental sustainability.

AI is already transforming consumer protection agencies' work by moving from reactive to proactive enforcement. By analyzing vast amounts of data, it can identify deceptive business practices, such as dark commercial patterns and misleading marketing⁸ more effectively than human analysts. It also helps address persistent challenges, such as limited resources and increasing case complexity, by prioritising complaints and detecting emerging patterns of misconduct. However, AI is not a one-size-fits-all solution. While it offers significant benefits, its deployment must be carefully managed to avoid risks like algorithmic bias, lack of transparency, or excessive reliance on automated outputs. Human oversight remains essential: AI should support, not replace, expert judgment and institutional autonomy.⁹

The effective use of AI depends not only on technological investment, but on structured governance, legal compliance, and strategic alignment with regulatory mandates.¹⁰ This is particularly important in diverse national contexts. In developing countries, for instance, limited computing resources and specialised expertise may present obstacles to adoption. These can be mitigated through international cooperation, partnerships, and resource-sharing initiatives that build capacity and promote equitable access to innovation.

In recognition of this evolving landscape, the UNCTAD informal Working Group on Consumer Protection in E-Commerce (WGE)¹¹ identified the use of AI by consumer protection agencies as a key area of interest. To explore this topic further, a technical note titled "Artificial Intelligence and Consumer Protection"¹² was prepared showing the potential role of AI in supporting the work of consumer protection authorities. The note outlines possible use cases, identifies key risks and challenges—including those related to transparency, bias, accountability, and environmental sustainability—and provides guideline to help authorities approach AI adoption in a responsible and rights-based manner.

This checklist builds on the insights of the technical note and reflects the discussions and experiences shared within the WGE. It is intended as a practical, non-prescriptive tool to help consumer protection agencies assess whether, when, and how to adopt AI in support of their enforcement and monitoring functions and aims to support thoughtful and context-specific decision-making grounded in the realities of public enforcement.

⁷ UNCTAD informal working group on consumer protection in e-commerce (2025). Artificial Intelligence and Consumer Protection. Available at: https://unctad.org/system/files/information-document/ccpb_artificial_intelligence_consumer_protection_en.pdf

⁸ Dougherty, S. (2023). Deploying artificial intelligence and data analytics to support intergovernmental fiscal relations. OECD Network on Fiscal Relations across Levels of Government. Available at: <https://www.oecd.org/tax/federalism/deploying-artificial-intelligence-and-data-analytics.pdf>

⁹ UOKiK (2024). Advancing Consumer Law Enforcement with Artificial Intelligence. Polish Office of Competition and Consumer Protection. Available at: <https://uokik.gov.pl/Download/617>

¹⁰ IMDA (2024). AI Playbook for Small States. Infocomm Media Development Authority. Available at: <https://www.imda.gov.sg/about-imda/international-relations/digital-forum-of-small-states>

¹¹ <https://unctad.org/Topic/Competition-and-Consumer-Protection/working-group-on-consumer-protection-in-e-commerce>

¹² UNCTAD informal working group on consumer protection in e-commerce (2025). Artificial Intelligence and Consumer Protection. Available at: https://unctad.org/system/files/information-document/ccpb_artificial_intelligence_consumer_protection_en.pdf



Whether an agency is considering its first pilot or scaling up an existing AI system, the checklist provides a structured set of questions to guide planning, procurement, development, implementation, and oversight. Ultimately, it seeks to help agencies deploy AI in ways that enhance their ability to protect consumers, while upholding the core values of fairness, proportionality, due process, and environmental responsibility.

This is a living document and may evolve as new technologies, experiences, and regulatory approaches emerge. The work of the WGE continues to provide a valuable platform for sharing lessons learned and supporting mutual capacity-building among consumer protection authorities worldwide.



Checklist: A Structured Approach to AI Adoption

A well-designed AI strategy can deliver significant benefits, driving operational efficiency, ensuring compliance with legal standards, and strengthening public trust. For enforcement agencies, success lies in adopting AI in a way that supports and enhances decision-making while keeping human oversight at the core. A robust AI adoption framework should therefore address key questions to ensure responsible and effective implementation. On the other hand, a poorly executed AI strategy can create more problems than it solves, leading even to environmental degradation.¹³

This AI checklist aims at helping consumer protection enforcement agencies integrate AI effectively, ethically, and sustainably. It is based on practice and experience of consumer protection agencies that have already walked the path of AI.

1. Understand the task or function AI will assist you with

Identify the specific issues or challenges to be addressed.

- **Why it matters:** It is important to first fully understand the issue to ensure that AI is the right tool. This helps avoid potential risks. Remember, AI may not always be the best solution for every issue.
- **How to do it:** Look at past cases, reports and research to identify patterns of problems like unfair commercial practices, consumer right infringements, or inefficiencies. Discuss with different agency departments to make sure everyone is clear on the issue you want to address.
- **Practical tip:** Use examples from previous cases that clearly illustrate the problem you want to solve. For this, check your past records, discuss with peer national agencies and research international examples.

¹³ Climate degradation implications of AI and machine learning are significant but still highly uncertain. The environmental implications arising from AI and machine learning can be categorized into direct effects (gas emissions resulting from computing) and indirect effects (the effect of gas emissions from applications of AI or machine learning, as well as structural or "system-level" gas effects induced by these applications). UNCTAD (2024) Digital Economy Report: Shaping an environmentally sustainable and inclusive digital future. Available at: https://unctad.org/system/files/official-document/der2024_en.pdf



2. Ensure AI is the appropriate tool for the identified problem

Make sure AI is the right technology to solve these problems.

- **Why it matters:** Not every challenge requires AI. AI could be costly to deploy. Agencies should assess whether AI genuinely adds value, or if traditional methods remain more effective.
- **How to do it:** Conduct a cost–benefit analysis comparing AI with traditional approaches by estimating potential gains in speed, coverage, accuracy, and resource savings. Analyze the existence of high-quality data for AI to function effectively. Also, check possible regulatory constraints to AI implementation.
- **Practical tip:** If free of regulatory constraints, use a simple evaluation matrix to score potential AI use cases across criteria like impact, feasibility, data readiness, and risk level. This will help prioritize efforts and avoid overcommitting tech that does not match the agency's needs.

3. Set clear and achievable goals

Define the expected role of the AI tool in concrete, realistic terms—such as improving speed, accuracy, or coverage in a specific process.

- **Why it matters:** Once the problem is clear, setting focused goals ensures that the AI tool is designed with purpose. It helps track progress and evaluate results. This avoids developing tools that are technically advanced but do not meet operational needs.
- **How to do it:** Identify what success looks like in practical terms. Break the goals down into simple, measurable actions. For example, you could set a goal for AI to sort complaints by priority within a certain time or identify patterns in customer feedback that need attention.
- **Practical tip:** Keep the goals simple and relevant, like reducing time spent on manual tasks, to ensure the AI tool is useful and easy to implement. Draft your goals with indicators you are familiar with, this will allow you to adjust unrealistic expectations.

4. Build and train the right team

Bring together a diverse team and equip them to effectively implement and manage AI system

- **Why it matters:** A successful AI project relies on collaboration of experts from different fields, including technology, law, technical staff and management.
- **How to do it:** Assemble a multidisciplinary project team that draws on talent from across the organization. Identify and fill any skill gaps by hiring where needed and possible. Adopt a flexible, project-based structure that works within the constraints of public service hierarchies. Assign roles based on skills and responsibilities rather than formal titles. Provide tailored training activities for each role, if possible. Appoint a “bridge” or “translator” profile—someone who can facilitate communication between technical developers and policy/legal staff. This helps prevent misunderstandings and ensures effective collaboration.
- **Practical tip:** Organize mock case exercises where the team can practice using prototypes to analyse real-world scenarios. This hands-on experience will help build confidence, encourage collaboration and ensure that all members understand how the system supports their roles.



5. Use a flexible development approach

Take a practical and adaptable approach to building and rolling out your AI system

- **Why it matters:** Flexibility is crucial in navigating the complexities of AI projects, especially due to the rapid progress in digital technologies. Balancing structured workflows with adaptability ensures progress while respecting the unique operational realities of public institutions.
- **How to do it:** Break the project into small, manageable phases. Test each phase, gather feedback from users, and adjust before moving on. This approach minimizes risks and ensures the tool meets real-world needs. Use the approach for further development of the tool and of further potential projects.
- **Practical tip:** Use dedicated project management tools, that you are familiar with, to plan tasks and monitor progress effectively. These platforms enable team members to track updates, provide input, and stay aligned in real time, fostering transparency and faster problem-solving.

6. Ensure seamless integration with existing systems

Make sure the AI system works smoothly with your existing tools and processes.

- **Why it matters:** An AI tool that operates in isolation will not deliver its full potential. Integration ensures it fits into current workflows.
- **How to do it:** Early in the project, check if the system is compatible with your existing tools and processes. Use simple methods to connect the AI system with your current setup so it supports and enhances your work, rather than causing disruption.
- **Practical tip:** Focus on integrating the AI system with your current setup so it supports and enhances your work, rather than causing disruption.

7. Secure the right funding

Make sure you can cover not just the development and deployment, but also the maintenance of your AI system

- **Why it matters:** AI projects can be expensive, especially upfront. Beyond the technology itself, you will need to budget for training activities, system upgrades, and cybersecurity measures.
- **How to do it:** Explore internal budgets, as well as external funding options, such as grants or partnerships that can reduce costs. Remember, investing in AI is not just a one-time thing. Resources will be needed to keep it running effectively.
- **Practical tip:** When presenting the case for funding focus on benefits of AI in improving operational efficiency and consumer protection, such as faster detection of issues and cost savings in the long run. Showing how the tool can deliver tangible outcomes may help convince management to allocate the necessary funds.



8. Get your data in order

Make sure your data is clean, accurate, and ready to use.

- **Why it matters:** AI systems are only as good as the input data. Poor-quality data leads to unreliable results, and the critical process cleaning data can be a demanding, time consuming and expensive.
- **How to do it:** Centralize data into one repository and clean it: remove duplicates, correct errors, and ensure it is properly structured. Since data quality varies, prepare for ongoing efforts to clean and audit regularly. Expert assistance and advice are needed.
- **Practical tip:** Start small by focusing on one dataset (e.g., prohibited clauses) to test the AI's accuracy and functionality. This incremental approach avoids being overwhelmed by cleaning or preparing all datasets at once. Plan the process with experts who build and work with the databases within the organization, and others as necessary.

9. Monitor and refine the system

Keep improving your AI tool after it goes live.

- **Why it matters:** The market changes, and so do consumer behaviours. AI systems need regular updates to remain effective.
- **How to do it:** Establish metrics to track performance—accuracy, speed, and user satisfaction are good starting points. Encourage users to provide feedback and use it to guide system updates. Consider options for further development of new solutions.
- **Practical tip:** Conduct reviews every three months to assess the AI tool's performance and identify areas for improvement, ensuring it continues to meet evolving legal and consumer protection needs.

10. Be transparent about AI usage

Promote transparency in how AI systems are designed, implemented, and used in decision-making processes.

- **Why it matters:** Transparency fosters public trust, enhances accountability, and allows agencies to demonstrate the fairness and reliability of AI systems. It also facilitates both internal and external reviews of AI-based activities, helping to address concerns before they escalate, while ensuring compliance with all legal provisions concerning due process and the rule of law.
- **How to do it:** Publish plain-language explanations of the AI system's functionality, objectives, and limitations. Ensure decision-making processes involving AI are well-documented and accessible for audits or reviews.
- **Practical tip:** Regularly share simple reports or infographics summarizing the ongoing benefits of the AI system, such as the number of cases reviewed or time saved. Keep language clear and focused, so stakeholders can quickly understand the benefits.



11. Guarantee compliance with ethical standards and the law

Ensure your AI tool aligns with ethical standards and complies with legal frameworks from the earliest stages of its design and throughout this operation.

- **Why it matters:** Public trust and legal compliance are non-negotiable, especially in sensitive areas like consumer protection. Ethical and legal safeguards should not be an afterthought; they must guide the planning, design, deployment, and ongoing use of the tool.
- **How to do it:** Involve legal experts when drafting system specifications and verify compliance with data protection laws. Set up oversight mechanisms to regularly review how the AI tool operates. Make sure the system does not make unchecked decisions—human review is essential. Train staff on legal and ethical best practices related to data privacy and AI use.
- **Practical tip:** Establish a "compliance by design" approach, ensuring that legal and ethical considerations are built into every stage of the AI's lifecycle, from development to deployment.

12. Safeguard data privacy

Prioritize the protection of sensitive and personal data throughout the AI lifecycle.

- **Why it matters:** Handling consumer data responsibly is critical for maintaining public trust and avoiding reputational risks.
- **How to do it:** Implement strict data governance policies, including encryption, anonymization, and controlled access to datasets. Regularly audit data handling practices to ensure compliance with privacy laws and best practices.
- **Practical tip:** Limit access to sensitive data by using tools or methods that allow AI systems to analyze patterns without directly handling personal information. This keeps data secure while still letting the system learn and improve.

13. Make AI systems secure

Protect your AI systems and the data they use from cyber threats.

- **Why It Matters:** AI handles a lot of important data, making it a target for hackers. Strong security keeps your information safe and builds trust with users.
- **How to do it:** Use advanced security tools like encrypted data, strict access controls, and systems that can spot and stop threats quickly.
- **Practical tip:** Test your AI tools in a secure, isolated environment (called a sandbox) before making them live. This reduces risks and catches issues early.



14. Maintain decisional authority

Ensure that officials retain ultimate responsibility for decisions influenced by AI systems.

- **Why it matters:** While AI can assist in decision-making, it is crucial that humans oversight to uphold accountability and prevent over-reliance on automated systems. This is especially important for preserving the legitimacy of legal and administrative decisions.
- **How to do it:** Clearly define the boundaries of AI systems, specifying which tasks they can handle and where human intervention is mandatory. Train officials to interpret AI outputs critically and exercise independent judgment.
- **Practical tip:** Develop protocols requiring human validation for all high-stakes decisions. For instance, mandate that AI recommendations on regulatory enforcement be reviewed and approved by a qualified legal officer.

15. Consider environmental sustainability in AI deployment

Minimize the environmental footprint of AI systems across their entire lifecycle.

- **Why it matters:** AI systems contribute to growing energy consumption, raw material extraction, water usage, and electronic waste—especially in data centres and semiconductor production. According to UNCTAD's Digital Economy Report 2024, the ICT sector alone accounted for up to 3.2 per cent of global greenhouse gas emissions in 2020, with impacts expected to increase due to compute-intensive technologies like AI.¹⁴
- **How to do it:** Prioritize energy-efficient models, cloud providers with commitments to environmental sustainability, and vendors with transparent environmental disclosures. Explore options for reusing and recycling hardware and avoid unnecessary upgrades that increase waste. Include sustainability requirements in procurement processes.
- **Practical tip:** When selecting AI solutions, ask vendors for data on their tools' environmental footprint. Consider adopting circular digital practices—such as shared infrastructure, extending hardware lifecycles, and using software designed for low energy use—to align with national and international environmental goals.

¹⁴ UNCTAD (2024) Digital Economy Report: Shaping an environmentally sustainable and inclusive digital future. Available at: https://unctad.org/system/files/official-document/der2024_en.pdf



CONCLUSION

Artificial intelligence offers consumer protection agencies powerful opportunities to enhance enforcement, improve efficiency and better understand evolving market dynamics. Yet, its deployment must remain grounded in the principles of fairness, transparency, accountability, and sustainability that underpin consumer protection.

This checklist is intended to help agencies reflect on the practical, legal, and organizational considerations involved in adopting AI, and to support thoughtful, context-specific decision-making that keeps human oversight at its core. It is not a prescriptive tool, but a guide to help agencies plan, implement, and review AI systems responsibly and effectively.

The continued exchange of experiences and cooperation among consumer protection authorities—through platforms such as UNCTAD's Informal Working Group on Consumer Protection in E-Commerce—will be essential to refining this checklist and ensuring that all countries, regardless of their level of digital maturity, can benefit from AI in a fair and inclusive way.



Annex: National case studies of AI adoption in consumer protection

This section showcases the examples shared by Consumer Protection Agencies in the context of the UNCTAD informal working group on consumer protection in e-commerce work cycle 2024-2025.

In **El Salvador**, the Defensoría del Consumidor (DC)¹⁵ in early 2025, took its first steps toward integrating new technologies to enhance institutional efficiency. Specifically, the Sanctioning Court within the agency began developing a digital tool to streamline the drafting of initial and final resolutions in administrative sanctioning procedures.

This initiative was led by a legal technician recognized for her expertise in the Sanctioning Court. After receiving specialized training in new technologies in the Republic of Korea, she applied her knowledge to improve internal workflows. The original plan was to integrate AI to assist in drafting legal resolutions. These drafts would still be reviewed and validated by legal technicians. However, the institution lacked the necessary resources to fully deploy AI for this purpose. Moreover, it became evident that the deployment of AI was not the most practical solution for automating simple, repetitive tasks typically handled by the legal team.

Once the needs, processes, and workflows were clearly identified, alternative solutions were explored. The team concluded that a more viable option was a hybrid digital tool that incorporated elements of AI to generate legal document templates—or modular text blocks—that could accelerate the resolution drafting process. Python and Google Colab were the main technologies used in developing this tool.

To create the templates, the team analyzed the catalogue of infringements under the Consumer Protection Law and selected objective violations—those that do not require an assessment of the supplier's intent and for which the supporting evidence is generally indisputable. These templates automated the repetitive aspects of drafting resolutions and were designed to be completed and validated by legal technicians.

The tool was not deployed immediately; a testing phase was conducted to assess potential errors and measure time savings. After this stage, the tool was successfully implemented. As a result, procedures that previously took six to eight months to resolve can now be completed in approximately two months, thanks to the tool and the dedication of the agency's legal staff.

This case clearly illustrates that adopting new technologies does not always require full AI integration from the outset. More realistic and resource-conscious solutions can be equally effective. It also highlights the importance of considering the users' profiles, their daily tasks, and choosing user-friendly tools that do not require programming or AI expertise. These factors are essential for ensuring adoption, effectiveness, and sustainable results.

Ultimately, what matters most is taking the first step—being open to exploring practical digital solutions that improve workflows and optimize available resources.

¹⁵ <https://www.defensoria.gob.sv/>



In **Poland**, the Office of Competition and Consumer Protection (UOKiK)¹⁶ has developed and implemented since 2023 artificial intelligence tools to support legal enforcement in two highly specialized areas: the analysis of abusive clauses in contracts and the detection of manipulative design practices known as dark patterns. The first system, known as Arbuz,¹⁷ uses natural language processing to scan and analyse standardized contract terms, flagging potentially abusive provisions based on a legal database curated by the agency. UOKiK emphasized that the success of Arbuz was made possible by forming an interdisciplinary team composed of legal experts, IT professionals, and data analysts. This team ensured that the tool was not only technically robust but also legally precise and user-friendly for case handlers. Training staff to understand the system's inner workings was a crucial step, as users are responsible for both inputting data and interpreting the tool's output.

The agency has also embarked on an ambitious second project focused on detecting dark patterns—user interface designs that trick consumers into making decisions they would not otherwise make. This includes tactics like false scarcity messages, default opt-ins, and misleading countdown timers. To train AI models for this task, UOKiK combined website code analysis with psychological and neuromarketing studies, enabling the tool to recognize behavioural manipulation more effectively. A key challenge was the dynamic nature of dark patterns, which evolve rapidly and have no definitive legal classification, requiring the database to be continuously updated. During testing, UOKiK also experimented with GPT-based chatbots trained on both text and images to identify manipulative features, though results varied due to the complexity of interpreting visual layouts. Legal and ethical compliance remains a top priority; the agency insists that all AI-generated results are reviewed by humans, and that final decisions are always made by qualified case officers. The issue of data integrity is also taken seriously modifying outdated data, safeguarding accuracy, and preventing unauthorized access are built into the system architecture. UOKiK's approach emphasizes that AI must serve the institution's goals without compromising accountability, fairness, or legal certainty. Looking ahead, Poland plans to expand its dataset, refine detection models, and strengthen interdisciplinary collaboration to ensure the tools remain effective in a fast-changing digital environment.

In **Republic of Korea**, the Korea Consumer Agency (KCA)¹⁸ has undertaken a comprehensive digital transformation initiative through a three-year project (2022-2024) aimed at integrating artificial intelligence into its core administrative and enforcement functions. This initiative, known as the AI based Integrated Consumer Complaint Handling Platform, is designed to improve the management of consumer complaints and enhance institutional efficiency across various operational areas. The platform comprises several interlinked AI tools and databases, each with a specific purpose. One of the most notable innovations is Knowledge Vine II, an intelligent internal search engine that retrieves relevant case law, guidance documents, and regulatory data for staff, greatly accelerating internal research and decision-making. Another essential component is an AI-based drafting system, which generates the initial versions of case reports and dispute settlement decisions by extracting structured information from the internal intranet system SOBINET. This tool is expected to reduce the time spent on routine documentation while maintaining legal accuracy, although it requires constant supervision by legal professionals to ensure compliance with current legislation. The agency also created a Work Guide Bot, which assists staff by automating access to internal menus and simplifying repetitive administrative processes. To enhance public-facing services, KCA introduced a chatbot¹⁹ populated with 80,000 carefully prepared standard responses, enabling faster and more consistent communication with consumers.

¹⁶ <https://uokik.gov.pl/en>

¹⁷ UOKiK, White Paper, download here: <https://uokik.gov.pl/Download/617>

¹⁸ <https://www.kca.go.kr/eng/main.do>

¹⁹ <https://www.kca.go.kr:8443/smartchat/>



However, the integration process has not been without obstacles. One significant technical issue was AI hallucination, where large language models produced incorrect or misleading outputs due to incomplete or biased training data. KCA responded by investing in better data curation and engaging staff in iterative feedback loops to refine the system. Another challenge was the interoperability between existing legacy systems and newly developed AI modules, which required fine-tuning and coordination across departments. The agency also struggled with ensuring that early standard chatbot responses aligned logically with the platform's AI architecture, leading to the development of a new, more comprehensive response library. Institutional issues included concerns over privacy, particularly the handling of personal data within the data used for training AI models. To address this, KCA adopted anonymization protocols and developed internal guidelines for data protection. Furthermore, inter-departmental cooperation was initially limited due to workload pressures, making it difficult to involve subject-matter experts in early testing stages. A lack of familiarity with AI tools among employees also hindered adoption, prompting the launch of awareness sessions and internal training activities. Moving forward, the agency plans to roll out an official version of the Work Guide Bot and update the chatbot after further testing. A user manual on knowledge management is also planned to ensure sustainable operation and institutional memory. Through these measures, KCA aims to become a regional model for responsible and effective AI use in public service delivery.

In **Thailand**, the Office of the Consumer Protection Board (OCPB)²⁰ since 2024 has integrated artificial intelligence into its enforcement framework to improve both consumer complaint resolution and market surveillance. The agency's approach emphasizes not only the deployment of AI tools but also the alignment of these tools with existing legal procedures and ethical standards. One of the primary uses of AI at OCPB is in automated complaint triage,²¹ where incoming consumer complaints are filtered, categorized, and prioritized based on severity and subject matter. This has significantly reduced the time taken to assign cases and improved resource allocation. Additionally, the agency has developed an AI system for detecting fraud in digital advertising, which scans a high volume of online ads in real time to identify potentially misleading or illegal content. This is particularly critical in a digital marketplace saturated with product claims related to health, price comparisons, and limited-time offers.

In selecting appropriate AI tools, OCPB had to make key decisions between rule-based systems and machine learning models. Scalability and the ability to integrate with existing complaint databases were crucial considerations in the final choice. Despite these gains, the implementation process encountered several challenges. A major issue was data quality, as initial datasets used to train AI models were often incomplete or biased, resulting in low accuracy in predictions and classifications. The agency addressed this by setting up data standardization protocols and establishing partnerships with digital platforms and industry actors to access more reliable information. Another hurdle was resistance to change among some staff, particularly concerns that AI might reduce human oversight or job relevance. To counter this, OCPB maintained a "human-in-the-loop" framework, ensuring that AI outputs are always reviewed by qualified professionals before being acted upon. The agency also invested in specialized staff training activities to help enforcement officers better understand how AI models work and how their outputs should be interpreted. Cybersecurity was another area of concern, especially due to the sensitive nature of consumer complaint data. To mitigate risks, the agency implemented strict privacy safeguards, including compliance with Thailand's Personal Data Protection Act and conducting regular audits of its AI systems. Looking ahead, OCPB plans to extend its AI capabilities into predictive analytics, where the system could proactively identify fraud trends based on historical data. Furthermore, the agency aims to develop multilingual functionalities in its chatbot to support a more inclusive service for consumers who do not

²⁰ https://www.ocpb.go.th/index_en.php

²¹ <https://complaint.ocpb.go.th/>



speak Thai. This dual focus on internal efficiency and public accessibility underscores Thailand's ambition to modernize consumer protection through intelligent, ethical, and scalable AI solutions.

In **Zambia**, the Competition and Consumer Protection Commission (CCPC)²² is in the early phases of integrating artificial intelligence into its enforcement and case management processes. Recognizing the limitations of manual enforcement in a rapidly digitizing economy, CCPC has prioritized the development of two main tools. The first is the enhancement of its Case Management System (CMS)²³ through the integration of a chatbot. This chatbot will allow consumers to file complaints online, receive automated responses, and track the progress of their cases using a case number—an improvement over the current system, which relies heavily on in-person follow-ups and email communication. The goal is to reduce administrative burdens while enhancing consumer access to justice. The second project is a market surveillance tool that uses large language models to perform tasks such as price tracking, pattern recognition, and the detection of potential collusive practices in digital markets. This tool is still in the planning phase, but it is designed to help identify anti-competitive behaviour that may otherwise go unnoticed in informal digital transactions.

However, Zambia faces several systemic challenges in implementing these tools. One major issue is the country's limited digital infrastructure, including low internet penetration and high data costs, which hinder data collection and real-time monitoring. Moreover, much of Zambia's e-commerce activity takes place on informal platforms like WhatsApp and Facebook Marketplace, where sellers rarely register their transactions or provide structured data. Another problem is fragmented data sources, as consumer complaints, pricing information, and transaction records are dispersed across various unconnected platforms. To address these issues, CCPC has adopted a phased approach, beginning with pilot projects and planning gradual scale-up based on success and lessons learned. The agency also suffers from a shortage of in-house AI expertise and has therefore sought partnerships with universities and local tech firms to build custom tools tailored to its legal and economic context. To ensure long-term effectiveness, CCPC emphasizes the importance of continuous capacity building, with plans to train enforcement officers in how to interpret and act upon AI-generated insights. Human oversight will remain central, both to ensure ethical use of AI and to maintain the trust of consumers and businesses. Despite current limitations, Zambia's commitment to innovation demonstrates how even resource-constrained agencies can begin to benefit from AI by adopting context-appropriate, scalable, and transparent approaches.

²² <https://www.ccpc.org.zm/>

²³ <https://cms.ccpc.org.zm/>



Bibliography

European Union Agency for Law Enforcement Cooperation (Europol) (2022). *Facing Reality? Law Enforcement and the Challenge of Deepfakes: An Observatory Report from the Europol Innovation Lab*. Publications Office of the European Union. Luxembourg.

Federal Trade Commission (2022). *Combatting Online Harms Through Innovation: A Report to Congress*. Washington, D.C.

Gosline R. and Zhang Y. (2023). *Human Favoritism, Not AI Aversion: People's Perceptions (and Bias) Toward Generative AI, Human Experts, and Human-GAI Collaboration in Persuasive Content Generation. Judgment and Decision Making*. 18: e41.

International Telecommunication Union (2024). *AI Governance Day – From Principles to Implementation: 2024 Report*. Geneva.

Norwegian Consumer Council (2023). *Ghost in the Machine: Addressing the Consumer Harms of Generative AI*. Oslo.

Office for Competition and Consumer Protection of Poland (2024). *White Paper: Advancing Consumer Law Enforcement with Artificial Intelligence*. Warsaw.

Riefa C. and Coll L. (2024). *The Transformative Potential of Enforcement Technology (EnfTech) in Consumer Law*. Reading.

Riefa C. and Coll L. (2024). *Use of AI Enforcement Technology (EnfTech)*. In: Di Matteo L., Poncibo C. and Howells G., eds. *Cambridge Handbook of AI and Consumer Law*. Cambridge University Press. Cambridge.

The United Nations Secretary-General's High-level Advisory Body (2023). *Governing AI for Humanity: Interim Report*. New York.

The United Nations Secretary-General's High-level Advisory Body (2024). *Governing AI for Humanity: Final Report*. United Nations publication. EISBN. 9789211067873. New York.

The White House (2023). *Executive Order on the Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence*. Washington, D.C.

UNCTAD (2023). *Technology and the Future of Online Dispute Resolution (ODR) Platforms for Consumer Protection Agencies*. UNCTAD/TCS/DITC/INF/2023/5. Geneva.

UNCTAD (2024). *Consumer Dispute Resolution in the World*. United Nations publication. Sales No. E.24.II.D.8. New York.

UNCTAD (2024). *Digital Economy Report 2024: Shaping an Environmentally Sustainable and Inclusive Digital Future*. United Nations publication. UNCTAD/DER/2024. Geneva.

UNCTAD informal working group on consumer protection in e-commerce (2025). *Artificial Intelligence and Consumer Protection Technical Note*.

United Nations (2024). *Pact for the Future, Global Digital Compact and Declaration on Future Generations*. New York and Geneva.

United Nations (2015). Resolution on Consumer Protection. A/70/186 of 22 December. Available at <https://undocs.org/en/A/RES/70/186>.

