



23 April 2026

Working Group on Consumer Protection in E-Commerce

Meeting summary 2025–2026

Vulnerable consumers in digital markets

The meeting of the [UNCTAD informal Working Group on Consumer Protection in E-Commerce](#) (WGE) on [vulnerable consumers in digital markets](#) was held virtually on 23 April 2026, from 14.00 to 15.30 (CEST). The meeting was convened as a closed, members-only session for WGE participants to provide an opportunity for direct exchange among government officers, consumer protection authorities, civil society and academic experts.

The meeting focused on two emerging issues in consumer protection in e-commerce: neuromarketing and behavioural science, and age limits for social media from a consumer protection perspective. The meeting also included a dedicated segment on future activities, next steps and priorities for the forthcoming work cycle of the Working Group.

Rémi Lang, Officer-in-Charge of the Competition and Consumer Policies Branch at UNCTAD, opened the meeting by recalling the Working Group's work on artificial intelligence, cross-border cooperation and vulnerable consumers, including its webinars. He noted that digital markets are not neutral spaces but are designed to influence behaviour. He also highlighted UNCTAD's role as the United Nations focal point for consumer protection and emphasized that the Guidelines call for consumers in e-commerce to enjoy protection equivalent to that in other forms of commerce.

Valentina Rivas, Programme Management Officer, Competition and Consumer Policies Branch, UNCTAD, and Professor Christine Riefa, University of Reading and Academic Coordinator of the UNCTAD informal WGE, facilitated the meeting and discussion.

SUMMARY





Presentations

Neuromarketing, behavioural science and consumer protection

Ettore M. Lombardi, Professor of Private Law at the University of Florence, presented research on neuromarketing and its implications for consumer protection in digital markets. He described neuromarketing as the use of neuroscience-based techniques to analyse and influence consumer behaviour, noting both its potential to enhance personalization and its risks, including manipulation, exploitation of vulnerabilities and reduced consumer autonomy.

He emphasized the importance of “cognitive liberty”, that encompasses mental privacy, integrity and continuity, as a guiding framework for regulation. The presentation reviewed relevant legal approaches, including data protection, consumer law, AI and digital regulation. In conclusion, Professor Lombardi stressed that the aim is not to hinder innovation, but to ensure these techniques are used responsibly, with safeguards to protect individual dignity and meaningful consent.

Age limits for social media from a consumer protection perspective

Emy Gustavsson and Cecilia Norlander, Senior Legal Officers at the Swedish Consumer Agency, presented on age limits for social media from a consumer protection perspective. They noted that such measures are being considered or implemented in many countries to address risks such as harmful content, addictive design, unfair commercial practices and hidden advertising targeting children.

The speakers highlighted that, while often framed as safety or rights issues, these measures are less frequently analysed from a consumer protection perspective, despite the commercial drivers behind many harms. They also pointed to key challenges, including age verification, circumvention, impacts on children’s rights, and the risk of shifting users to less regulated platforms.

The Swedish Consumer Agency outlined its role in the national assessment of potential age limits and presented research showing that children’s capacities and vulnerabilities vary significantly by age and context. The presentation emphasized that access restrictions alone may be insufficient, as they can hinder digital skills, reinforce inequalities and be easily bypassed. A more effective approach would combine age-appropriate design, platform accountability and education to better support and protect children online.

Discussion

The subsequent exchange focused on the practical implications of the presentations and possible areas for further work. Participants emphasized the importance of concrete examples and enforcement experience, with MGP India highlighting the need to gather cases to support regulatory development and to consider children, older persons and other vulnerable consumers.



The Swedish Consumer Agency shared its work on children's media and advertising literacy and suggested further analysis of child-appropriate platform design and platform accountability. Professor Lombardi stressed the need to apply existing international principles, particularly those relating to children's rights, and highlighted the importance of early education and awareness, as well as attention to older and less digitally literate consumers.

The Secretariat recalled examples from previous activities, such as in-game purchases and marketing practices creating peer pressure, underscoring the need to identify concrete harms. The Eswatini Competition and Consumer Commission raised concerns about mobile gambling and its impact on young consumers, pointing to weak safeguards and broader social risks. PROFECO Mexico outlined its monitoring of digital platforms, including review of terms and conditions and enforcement action where needed.

The discussion also referred to the possible relevance of product liability, platform design accountability and related work concerning online harms affecting children. Participants were informed that additional exchanges on related issues would take place in the forthcoming meeting of the Research Partnership Platform.

Summary of the 2025–2026 work cycle

The Secretariat reported that the 2025–2026 work plan of the WGE had been completed. The work cycle included the finalization [and dissemination of the Checklist for Consumer Protection Agencies Deploying AI](#), which was presented in October 2025, the [webinar on dynamic pricing](#) held in February 2026, and the present discussion on vulnerable consumers in digital markets.

The Secretariat indicated that a short report summarizing the meeting would be prepared and circulated to speakers and WGE participants for comments before being incorporated into the report to be presented to the [9th session of the Intergovernmental Group of Experts on Consumer Protection Law and Policy](#). Participants were reminded that the direction of the WGE is driven by UNCTAD member States and were invited to express views on whether the WGE should continue and which priorities should guide its next work cycle. The Secretariat also noted the importance of considering the work of other international organizations and networks in order to avoid duplication and build synergies.

Main issues of concern

Neuromarketing and behavioural science were identified as areas requiring close scrutiny. The ability to derive insights from physiological, behavioural or emotional responses may increase the precision of commercial persuasion and create risks for autonomy, meaningful consent, privacy and dignity. Participants noted the need to consider how consumer protection, data protection, AI regulation and private law may respond to practices that exploit subconscious responses or psychological vulnerabilities.

Continuation of the WGE

Participants expressed broad support for the continuation of the WGE. Supportive interventions emphasized that the WGE provides a valuable platform for international dialogue, exchange of experience, shared learning and cooperation.



Participants noted that the topics addressed by the WGE are global in nature and that consumer protection agencies benefit from continued access to comparative perspectives, expert input and examples of regulatory and enforcement practice.

Future work plan and prospects

The meeting identified several possible priorities for the 2026–2027 work cycle. Participants expressed interest in continuing work on AI and emerging technologies, including the practical use of AI tools by consumer protection agencies, the risks of AI for consumers, the implications of agentic AI, and the practical effect of new regulatory frameworks on enforcement.

Poland suggested that the WGE could build on the AI checklist by making it more practical, including guidance on both custom-built and off-the-shelf tools for enforcement. It also proposed exploring AI-related risks for consumers, including emerging developments with agentic AI, and assessing how existing regulatory frameworks for AI are working in practice.

The WGE also discussed the possibility of translating the AI checklist and related work into a self-paced online course for enforcement authorities. Such a course could be hosted on an e-learning platform and include modules, videos, written materials, quizzes and assessments. Participants noted that this could be particularly useful for new officials and for agencies facing staff turnover or capacity constraints, including in developing countries. The Secretariat indicated that a proposed curriculum could be circulated to gauge interest, receive comments and identify possible contributions from member States, agencies and academic experts.

A second priority area would be vulnerable consumers in digital markets. The Swedish Consumer Agency indicated willingness to contribute actively to work on children as vulnerable consumers. Possible outputs could include further analysis of child-appropriate platform design, guidance or best practices on platform accountability, and examination of how specific commercial practices affect children. Participants also supported consideration of other vulnerable groups, including older persons and consumers with limited digital literacy.

Several participants considered that the WGE should continue to address AI and emerging technologies while also deepening its focus on vulnerable consumers, particularly children and older persons.

As next steps, the Secretariat indicated that the minutes of the meeting would be drafted and circulated for comments. A report of the WGE would be prepared by approximately mid-May 2026, including a request for renewal of the mandate, for presentation to the forthcoming session of the IGE, scheduled for 6–8 July 2026. Following renewal, the WGE would further discuss the precise topics, leadership arrangements and outputs for the next work cycle. The discussion would continue by email on the basis of the minutes and report.

Closing

Professor Riefa thanked the speakers and participants for their contributions and noted that the issues discussed, including neuromarketing, vulnerable consumers and AI, are likely to remain central to the work of consumer protection authorities. Valentina Rivas closed the meeting by thanking the speakers, the moderator and participants, and indicated that the discussion would continue in preparation for the 2026–2027 work cycle.