AK EUROPA

Position Paper
February 2021
Digital

Digital Services Act

COM(2020) 825

Executive summary

The aim of the proposed Regulation is to foster innovation and competition, and facilitate the scaling-up of smaller platforms. In addition, the "responsibilities of users, platforms, and public authorities are rebalanced". A "clear accountability framework for online platforms" is intended to better protect consumers and their fundamental rights online.

The main benefits of the Proposal are...

... that **tracking of traders** is introduced. The usefulness of this crucial provision for curbing online crime is immediately limited by restrictions set out in the recitals (consumers cannot rely on the accuracy of data concerning third-party providers that is checked by platforms; platforms are not liable in that regard). It would be reasonable for online platforms to be liable for incorrect company data. Their monitoring duties should be assisted by an EU-wide business register that can be accessed online.

... that massive **enforcement failings with respect to illegal online advertising** are reduced to some extent by the transparency requirements for (very large) online platforms. Platforms must ensure compliance with rules concerning identification of advertising in their advertising spaces etc. The tracking of advertising on very large platforms through access to advertising repositories is particularly welcomed.

The main failings are...

... that **aspects of platform work are missing.** It is unclear why the key aspects of taxation of the digital sector and of online platform work have been left aside and are to be negotiated separately at a later date. In AK's view, the proposals on digital services and the digital single market should be negotiated in parallel with the proposals on the working conditions of platform workers and the digital tax, since the content of all four proposals is related.

... that the **liability of online platforms under consumer law** is, fortunately, excluded from the liability exemptions. However, there is a complete lack of accompanying positive liability principles applicable to negligent platforms. Currently, there is a fundamental lack of legal security as to when platforms are liable for their own errors and, what is more, for the errors of third-party providers.

... that in effect no distinction is made **between online marketplaces** (for the purchase of goods and services) **and other platforms** (e.g. for user communication). That means no use is made of the opportunity to set out different, tailored rules for platforms that are sensitive in terms of fundamental rights compared to the rules for purely online stores. The principle that intermediary services should not be subject to general monitoring obligations is entirely justified in the first category. However, in the case of transaction platforms for the sale of goods there are few grounds for paying more attention to fundamental rights. Online marketplaces should be subject to an obligation to investigate actively (via reporting systems and voluntary filtering efforts), especially with regard to offers that are clearly scams

... that **non-European platforms** that provide their services in the EU only have to demonstrate that they have a representative in the EU, but not an EU establishment. That greatly limits effective law enforcement with regard to internet corporations.

... that the few provisions concerning **reporting and dispute resolution systems** fall short of the legislative framework governing "online hate" in Austria, Germany and France. The consumer organisation BEUC criticises the fact that the focus is on "means", rather than on results, i.e. it is sufficient for companies to demonstrate that they have a reporting system, irrespective of how capable and efficient it is at removing illegal content. There is a need for independent, free dispute resolution entities, which should at least be co-financed by large platforms.

The AK's position

1. AK's position in detail:

1.1 Scope

Under Article 1(3) (recital 7), the Proposal applies to all intermediary services that are used by European users, irrespective of their place of establishment. However, intermediary services are only included if they store the content of third parties (or if online platforms "disseminate" such third-party content). Content providers that do not solely store third-party content cannot be considered to be included. Likewise, very large messenger groups and chat groups for online games are accessible to the general public but have evidently been excluded from the Proposal (recitals 13 and 14).

The following improvements are necessary:
Unfortunately, the e-Commerce Directive with its geographical scope limited to the EU (Article 1(1); recital 58) remains unchanged (with the exception of the exemptions from liability) – its scope should be extended to include providers from third countries. Whether the definition "to offer services in the Union" (Article 2 d)) is really the best way to ensure that non-European platforms without an establishment in the EU are subject to EU law should be checked (a "substantial connection" to the EU, such as a "significant number of users" or "the targeting of activities" towards the EU, is required; under recital 8, targeted advertising, the language used by the customer service etc. would be suitable reference points). Moreover, merely being subject to EU law falls too short: the DSA neither requires platforms to have an establishment in the EU for effective legal enforcement, nor are there enforcement agreements with China and the USA.

The definitions of online platforms in Article 2 h) and i) should be adapted to encompass messenger services so that they are future proof. After all, Facebook is planning for WhatsApp to perform a retail function between traders and consumers along the lines of the Chinese messenger service WeChat. Online gaming groups above a specified reach (in accordance with the case law on public dissemination) also include considerable illegal content and should be taken into account.

Furthermore, it should be clarified that, despite full harmonisation, national legislation that renders the Regulation more precise (such as the Austrian Act on Communication Platforms) is not in conflict with the Regulation.

Finally, the DSA should not lead to a further fragmentation of the law by only encompassing a subset of platforms (i.e. intermediary services, with no clear distinction from services that provide their own content). It is not entirely clear to what extent streaming platforms (which, for example, play films or music on the basis of licences of various copyright holders) come under the scope of the DSA. In the case of comparison and rating sites, as well as online media, hosted content and the site's own content are often mixed to a degree that is unclear to outsiders. Consumers expect the same protection in the case of all platforms, for example protection against illegal advertising.

1.2 Special treatment of liability claims under consumer protection law

Under Article 5(3), liability under consumer law of online platforms is removed from the system of general exemptions from liability for hosting providers. That is an important first step towards treating online marketplaces where consumers can generally purchase content, goods and services in a different way than other hosting providers such as social media. Under recital 17, the exemptions from liability under Article 5 should not be understood "to provide a positive basis for establishing when a provider can be held liable".

The following improvements are necessary:
It is regrettable that the Proposal does not even address the topic of individual legal protection (in comparison, for example, to Article 82 of the GDPR). Harmonised liability rules are essential for a modern and legally certain legislative framework for platforms. National civil and EU product liability law does not

currently provide any reliable reference points as to whether and in what cases online platforms are liable for the third-party providers that they allow to be displayed. That is hardly surprising since at the time when the liability rules were developed there were no retail structures similar to online platforms. A core part of the DSA should, therefore, be the provision of conditions specifying when online platforms are liable for breaches of duties and negligence of third parties leading to damage or losses for the consumer. The European Consumer Organisation BEUC recommends that the violation of certain duties of care should automatically result in civil liability claims against the platform or a joint liability of the platform and the third-party provider.

Article 5(3) excludes "liability under consumer protection law of online platforms" from the rules on exemptions from liability of hosting providers if they enable the "conclusion of distance contracts". That only applies if the average consumer is led to assume that the information, goods or services on offer, based on how they are presented by the platform, are provided by the platform itself or a third-party provider under the control of the platform. Our proposal is based on the Model Rules of the EU Law Institute recommended by the BEUC (https://www.europeanlawinstitute.eu/fileadmin/user_upload/p_eli/Publications/ELI_Model_Rules_on_Online_Platforms.pdf). Accordingly, joint and several liability of the platform provider would apply if the platform violates duties of care or the consumer "may reasonably rely on the platform operator having a predominant influence over the supplier". That requirement is given concrete form by a list of criteria, which are lacking in the Proposal.

To understand the pressing need for regulation, we recommend consulting the study published by the Federation of German Consumer Organisations (VZBV): https://www.vzbv.de/sites/default/files/downloads/2020/02/12/vzbv_gutachten_verbraucherechtliche_plattformhaftung.pdf. It shows that the (product) liability law in effect does not take the new sales structures of the platform economy into consideration. In terms of civil law, liability is partially affirmed if a third party (note: in this case the platform) is deemed to "control the transaction". Merely having a direct economic interest in concluding the contract, e.g. the prospect of receiving commission, is insufficient. The adoption of such considerations in the case of online platforms does not lead to legal certainty. In addition, the liability of third parties themselves is also affirmed in cases where the third party "by laying claim to a particularly high degree of trust during pre-contract negotiations, substantially influences the pre-contract negotiations or the entering into of the contract." The rating systems used by platform operators could serve as a reference point. Accordingly, consumers would be able to have maximum trust that rankings promoted to them as "the best results" do not contain recommendations for fake shops.

1.3 Clarification that intermediary services are not subject to general obligations of monitoring or active investigation

The motto of not imposing general, blanket obligations on internet and hosting services to carry out prior checks in cases affecting fundamental rights has proven to be effective and must be retained with respect to hosting providers that perform activities that are sensitive from a fundamental rights perspective (Article 15 of the e-Commerce Directive). In the case of social media and general platforms that are based on user-generated content or are communication services, the principle should be preserved without change. The freedom of opinion and of information are of exceptional importance here. When weighing up the pros and cons of preventive filtering measures, concerns about associated restrictions on fundamental rights and freedoms, according to the ECHR, far outweigh any potential restrictions. AK regards "proactive measures" (e.g. algorithm checks), such as those set out in the EU Regulation on combating terrorist content online, as problematic in terms of fundamental rights. AK rejects further derogations from Article 15 for the monitoring of content subject to freedom of opinion and of information, data protection and the protection of privacy.

The following improvements are necessary:
Under Article 7, hosting providers are not subject to a general monitoring obligation. In view of the purpose of the Regulation (legislation providing for a "safe, trustworthy online environment"; Article 1(2) b), this principle – which has proven effective in terms of fundamental rights – should certainly be adapted to online marketplaces providing goods and services. Scams are rife on online marketplaces. There should, therefore, be exemptions from the principle set out in Article 7 in areas in which the protection of fundamental rights does not play a substantive role, including online marketplaces and advertising activities in general. It is reasonable to expect online platforms to carry out obligatory filtering of offers that are clearly illegal (fake shops, counterfeit products) before consumers can be scammed, and it is unobjectionable in terms of fundamental rights.

The obligatory use of filters seems to be a modern and reasonable approach in the case of platforms that sell goods, as well as for advertising. If platforms do not fulfil their duty of clearly identifying third-party providers on their platforms and not displaying fraudulent offers that can clearly be identified during a preliminary check, they should be liable for any damage and losses incurred by customers due to their negligence.

1.4 Clarification that exemptions from liability do not apply in the case of notices that meet specific requirements

Under Article 14(3), notices that meet the high requirements set out in paragraph 2 shall be considered "to give rise to actual knowledge or awareness" of the platform about a violation pursuant to Article 5(1) b), in which case the general exemption from all liability no longer applies. This clarification is, in principle, welcomed from a consumer perspective.

The following improvements are necessary:
The requirements imposed on notices by users should not be so strict that they are an impediment for the average user. Only reporting systems with a low threshold are widely effective. The requirement to provide precise URLs, the name of the flagger and a statement of good faith, similar to a sworn declaration, that the information and allegations made are accurate, should therefore be omitted. Of course, such details may be requested on the notice forms. However, even without such details, adequately substantiated notices should be given due attention and, moreover, should not be a precondition for the exemption from liability not to apply. In the case of hate posts, flaggers are often under strong psychological pressure to avoid becoming the target of the hate posters themselves. It is, therefore, essential for anonymous notices to be allowed to encourage civil society to report illegal content. The need to give a statement of good faith – besides having a possible deterrent effect – also raises the question of the legal consequences for the flagger of assessing the situation incorrectly.

1.5 Introduction of a notice and complaint system:

Articles 14 to 17 require online platforms to establish "notice and action" mechanisms.

The following improvements are necessary:
In terms of the level of detail, the required reporting systems that form the basis for deleting illegal content, fall short of the requirements under the Austrian Communication Platforms Act. It is, therefore, important to clarify that the Regulation is not in conflict with national provisions that render the Regulation more precise. The European Consumer Organisation (BEUC) has rightly criticised the introduction of "obligations of means, not of results", i.e. the fact that it is sufficient if platforms provide reporting mechanisms – whether they react promptly and suitably is unfortunately irrelevant.

1.6 Fostering out-of-court dispute resolution

Service users are "entitled to select certified dispute resolution entities" to resolve such disputes concerning decisions on content that is flagged and (not) removed.

The following improvements are necessary:
Without the MS being subject to an obligation in the DSA to actually establish and properly fund specific dispute resolution entitles, the consumer right set out in Article 18 is of little value. The fact that dispute resolution entities are entitled to charge fees for their work is also consumer-unfriendly. Moreover, it needs to be clarified how cross-border cases should be handled. Very large platforms should at least be required to make a financial contribution, analogous to the polluter pays principle. With their minimal sense of responsibility for the content they disseminate, platforms have created a digital environment for a vast amount of illegal content.
Social media often rank hate postings higher because provocative content is shared more often and hence has a greater promotional impact. The extent of their profits also justifies requiring them to make a contribution to the financing of said entities.

1.7 Prioritisation of "trusted flaggers"

The digital coordinator of the respective MS grants (or revokes) this status under Article 19 to entities at their request providing that they represent collective interests, have expertise in identifying and reporting illegal content and carry out such activities diligently. Platforms must prioritise their notices.

The following improvements are necessary:
Trusted flaggers must also be able to perform their checks on platforms using modern equipment, such as the aid of self-learning software in an automated manner. We wish to refer here to a highly successful pilot project of the Austrian Internet Ombudsman which uses trained algorithms to identify fake shops. It is also worth to mention Watchlist Internet (www.watchlist-internet.at), which is unique across Europe – the website collects user reports and provides daily updated information about online fraud and fraud-like online cases on that basis. This important initiative for tackling cybercrime should be stepped

up to the EU level and its continued existence should be ensured through contributions to its financing by the Commission and the platforms that benefit from it. In addition, hosting providers should be required to monitor the entries on Watchlist Internet and ensure that the scam sites listed there are rapidly removed.

1.8 Very welcome introduction of the "know your business customer" principle

Under Article 22, traders that enable consumers to conclude distance contracts on online platforms should be "traceable". For that purpose, the platforms are required to collect the company data set out in paragraph 1 a) to f) and make reasonable efforts to check that they are correct. It is also positive that the platform has to inform users of the key identification data of third-party providers and collect user reports on incorrect data. If the third-party provider fails to correct or supplement the data, the provider must exclude it from the platform.

The following improvements are necessary:
The online platform is not liable for the correctness and completeness of the data it has checked (recital 50). As long as users suffer damage or losses as a result, it is unacceptable. Online marketplaces must at least be held liable for losses suffered by consumers as a result of false or incomplete data. The business registers of the MS have in principle been linked since June 2017 in accordance with Directive 2012/17/EU and accessible via European Justice, the EU's justice portal, as EU business registers (Business Registers Interconnection System – BRIS). It should, therefore, be easy to find stock corporations, private limited companies and their establishments, and companies registered as European companies (Societas Europaea - SE). So far, however, not all MS have enabled access to their registers. The quality of the company data differs greatly from country to country. The MS should, therefore, begin by ensuring the data are up-to-date and reliable. Online platforms should be required to provide a link to the relevant entry in the business register or trade register.

1.9 Transparency of online advertising

Article 24 requires online platforms to ensure that advertising displayed on their platform is identified as such and that information is provided concerning the entity on whose behalf it is displayed and the parameters for its selection.

The following improvements are necessary:
To reinforce consumers' right of self-determination with respect to invasions of their privacy by advertising tracking, consumers should have the right to choose. Users should be able to opt out of customised advertising in favour of privacy-friendly contextual advertising (e.g. a rail advertisement when reading an article about the climate crisis). In order to truly do justice to the right of self-determination of Internet users, the Robinson list for e-mail advertising under the e-Commerce Directive would have to become a real "stop tracking" tool for every form of online advertising. For further details, please see below.

1.10 Additional requirements for very large platforms only

"Very large" means used by at least 45 million people within the EU as a monthly average. Under Articles 26 to 33, these over-the-top players (OTTs) are required to assess and minimise risks, to undergo annual independent audits, to ensure that any recommender systems they use are transparent and privacy-friendly, to ensure additional advertising transparency and to make data accessible to the Commission, researchers and the digital coordinators. The following chart shows the various levels of requirements for four defined categories of intermediary services.

The following improvements are necessary:
Only very large platforms are, for example, required to maintain depositories of disseminated advertising to enable retroactive checks of the legal compliance of the advertising. It should be checked whether, for the protection of consumers, it would be justified and reasonable to impose obligations that only apply to very large platforms on other categories of providers as well.

1.11 Additional advertising transparency in the case of very large platforms

It is highly welcomed that, under Article 30, at least very large platforms are required to establish an advertising repository and make such content publicly accessible for the period of a year. That means: the content of the advertising, the entity on whose behalf the advertisement was displayed, the period during which the advertisement was displayed, the target groups and the total number of recipients reached.

The following improvements are necessary:
Online advertising opens the floodgates to manipulative, deceptive and criminal market practices. It is, therefore, disappointing that Article 36 encourages codes of conduct only for online advertising. Industry self-regulation is intended to ensure "a competitive, transparent and fair environment" and "the protection of personal data". In order to truly do justice to the right of self-determination of Internet users, the outdated

Robinson list for e-mail advertising under the e-Commerce Directive would have to become a real "stop tracking" tool for every form of online advertising. Currently the MS are required to establish a centrally managed opt-out option for unsolicited email advertising. In order to lend real added value to that essentially "dead letter" right, the provision should be extended to an opt-out with respect to personal behavioural tracking for the purposes of customised advertising. Research also supports such an opt-out in favour of contextual advertising. See for example: Strenge Hand gegen Google: Sollen wir Online-Werbung wie den Finanzmarkt regulieren?

Since advertising for dubious or fraudulent services is rife, it is essential to clarify responsibilities in the chain of advertising service providers and platforms. Given that platforms are involved in the marketing practices of online advertising through the behavioural profiles of their users and a share in advertising revenues, they should be required to assume greater responsibility with regard to illegal advertising. They should also be required to carry out prior automated checks on advertising for obvious illegalities (fake shops, prohibited or pirated goods, data theft and distribution of malware etc.).

1.12 Provisions concerning cooperation, enforcement and sanctions

Articles 38 to 66 of the Proposal address enforcement of the responsibility of platforms with respect to their compliance with the DSA and other EU and national law. The number of provisions indicates that more efficient enforcement is a key aim of the Commission. AK welcomes that aim, although it has doubts as to whether it can be achieved with the present concept.

The following improvements are necessary:
BEUC, the Federation of German Consumer Organisations (VZBV) and AK agree that the cooperation mechanism ("joint procedure") of the GDPR for data protection authorities has not proven effective and cannot serve as a model for successful enforcement. Under that model, authorities of varying competence and with differing resources and interest in cooperation are supposed to make joint decisions in cross-border cases led by an authority in charge on the basis of 27 different laws on administrative proceedings and a highly heterogeneous interpretation of the GDPR. With the current structures, it could well take years for key questions of interpretation to be clarified and for platforms to receive cease-and-desist orders and fines.
The "Ireland" problem serves as a warning that forms of cooperation rapidly come up against their limits if individual authorities have few resources and, moreover, are guided in their decision-making by the political desire to enable attractive forum shopping for large platforms. The DSA encourages forum shopping by enabling platforms, under Article 40(2), to be considered established at the place of residence of the representative, which may be strategically and freely chosen, without having an EU establishment. As mentioned at the beginning of this position paper, we wish to draw attention to the failing that the DSA only requires non-European platforms to name a point of contact and a representative, but not to have an establishment in the EU. Without enforcement options to access assets, insurance or bank guarantees in order to collect fines, the Commission (as in competition proceedings against Google, Apple, Microsoft etc.) remains dependent on mere willingness to negotiate. Numerous questions arise as to how the powers of the responsible authorities and digital coordinators under Articles 38 to 41 can be reconciled with the country-of-origin principle set out in Article 40 in cross-border cases (e.g. if the effect of the legal violation is in Austria and the establishment is in Ireland). Another failing may be noted with respect to the interplay of the numerous actors. Consumer associations are not given a substantive role, although they are supposed to support legal implementation as dispute resolution entities (Article 18), trusted flaggers (Article 19) and as authorised entities in representative actions (Article 72). Inclusion of consumer representatives in the European Board for Digital Services (Article 47) and the right to be heard before Commission decisions (Article 63) would therefore be appropriate.

2. Regulatory areas that have been unduly omitted

2.1 Lack of product liability rules for platforms

The EU Product Liability Directive is 35 years old. It provides no suitable answers with respect to the sale structures of online commerce and contains unsatisfactory loopholes affecting consumers that purchase goods via platforms from traders or manufacturers based outside the EU (especially in China).

Joint and several liability should apply to "fulfilment" service providers (warehousing, packing, addressing and distribution of products to which they have no right of ownership, excluding traditional postal services), as well as to manufacturers (Article 3(1) of the Product Liability Directive) and importers (Article 3(2) of the Product Liability Directive).

Indeed, joint and several liability according to the model of importer liability (Article 3(2) of the Product Liability Directive) is appropriate even for online marketplaces that do not perform fulfilment services. If platforms approve providers from third countries, it is reasonable for them to assume the risk of being subject to claims under the Product Liability Directive. Otherwise, consumers have absolutely no way of enforcing legal claims against, for example, US or Chinese providers.

With the aid of algorithmic risk assessments, platform providers would certainly be capable of not allowing risky products to be displayed on their marketplace in the first place (e.g. medicines, electrical devices from certain third countries etc.). Moreover, such financial risks can also be passed onto commercial users (e.g. by calculating the level of the commission according to the risk level of the respective product) and insurance can be taken out against the risk.

2.2 Lack of regulation of employee-related and taxation-related issues

AK cannot comprehend why the key aspects of taxation of the digital sector and online platform work have been left aside and are to be negotiated separately at a later date. Furthermore, in the case of many platforms the lines between users, consumers, employees and companies (and often workers in bogus self-employment) are increasingly blurred. It would, therefore, be necessary to negotiate the proposal on the working conditions of platform workers and the proposals on the digital tax simultaneously with the legislative proposals on the digital single market (DMA) and on digital services (DSA). In the case of the DSA, the definitions under Article 2 need to be suitably adjusted and clarified, with due attention also being paid to those changes in the subsequent articles.

Precarious working conditions at platform service providers:
Platform workers often work under precarious conditions. Many digital corporations refuse to recognise their status as employers. As a result, fundamental labour rights are called into question. Working for platforms must not lead to systematic undermining of national statutory minimum and collective agreement wages, as is currently often the case. Working conditions must be humane and should not overburden workers psychologically or physically. Those fundamental principles must also be recognised in the Digital Services Act. In terms of conditions of employment, in recent years, reports of poor working conditions at the largest digital service corporations, have repeatedly become public. In the coming years the number of people working for digital service providers is expected to increase. That is a further reason why it is essential for reference to be made to the conditions of employment at these digital platform companies.

Unequal treatment of workers and unequal taxation have both given the digital sector an unfair competitive advantage at the expense of traditional business sectors. According to the Commission, the effective tax rate for online businesses is 9.5% compared to 23.2% for traditional business models.

For its part, the European Trade Union Confederation (ETUC) pointed out during a debate in the European Parliament that workers in the digital sector are subject to precarious working conditions and that online companies regularly abnegate their role and responsibilities as employers.

AK therefore calls for the negotiations on digital services and the Digital Markets Act to be closely linked with the legislative proposals planned for 2021 on the working conditions of platform workers and the digital services tax, and for the legislative proposals to be swiftly concluded simultaneously, with the involvement of the social partners.

Threshold values in Sections 3 and 4:
The issue of the blurred distinction between employees, workers in (bogus) self-employment and contractors can also be seen in the thresholds. Section 3 of the Proposal sets out the obligations applicable to all online platforms. However, small and micro enterprises are excluded. For categorisation as a small or micro enterprise, the definition in the Annex to Recommendation 2003/361/EC is applied, which is based on number of employees and turnover. According to said Annex, SMEs are companies with fewer than 250 employees and annual turnover not exceeding EUR 50 million. Small companies employ fewer than 50 people and have annual turnover not exceeding EUR 10 million. Micro companies employ fewer than 10 people and have turnover not exceeding EUR 2 million.

Due to a lack of rules for platform workers, many workers perform their tasks for the platform companies in bogus self-employment and are, therefore, not included as employees as defined in the Recommendation. It is also conceivable for digital companies to be organised in such a way that their turnover is too low to come under the scope of the definition, while the majority of their turnover goes through a separate company. The aim, therefore, must be to prevent bypassing of the obligations in Section 3 and to identify criteria to ensure that platforms above

a certain size come under the scope of the obligations. It would be conceivable to use the number of users as an additional criterion (as in Section 4 of the Proposal). Establishing a threshold at the MS level, rather than merely a total threshold at the EU level, should be given due consideration. Some platforms have a significant influence at the national level and should be subject to the corresponding requirements.

Section 4 uses the number of users as a criterion for the obligations that platforms are required to comply with under that section. However, the threshold of 45 million users is extremely high. In addition, platforms that are only active in a single or very few MS, but are highly influential there, have not been taken into account. For large platforms that only operate in a limited region, a separate threshold (e.g. between 5 and 10 percent of the population of the MS in which the online company is active) should be included.

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About us

The Austrian Federal Chamber of Labour (AK) is by law representing the interests of about 3.8 million employees and consumers in Austria. It acts for the interests of its members in fields of social-, educational-, economical-, and consumer issues both on the national and on the EU-level in Brussels. Furthermore, the Austrian Federal Chamber of Labour is a part of the Austrian social partnership. The Austrian Federal Chamber of Labour is registered at the EU Transparency Register under the number 23869471911-54.

The main objectives of the 1991 established AK EUROPA Office in Brussels are the representation of AK vis-à-vis the European Institutions and interest groups, the monitoring of EU policies and to transfer relevant Information from Brussels to Austria, as well as to lobby the in Austria developed expertise and positions of the Austrian Federal Chamber of Labour in Brussels.