Corporate Law Briefing: Special Edition

EU Directive 2025/2647 on Consumer Alternative Dispute Resolution (ADR): Legal Implications for EU Businesses

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A. Background and Shift in Overall Approach Compared to EU Directive 2013/11

1. EU Directive 2025/2647 (the **Directive**) modernizes the EU framework for consumer alternative dispute resolution (**ADR**), amending EU Directive 2013/11. The revision responds to structural changes in consumer markets over the past decade, including the rapid growth of e-commerce and digital services, increased cross-border online transactions and the limited use of the EU Online Dispute Resolution (**ODR**) platform (partly due to language barriers and low engagement).
2. Against this background, the Directive marks a clear shift from a centralized, EU-wide ADR model towards nationally embedded and sector-specific systems, prioritizing dispute resolution mechanisms closer to consumers and traders and reflecting the diversity of markets, dispute types and languages across the EU.

B. Key Changes Introduced by the Directive

1. The Directive discontinues the EU ODR platform, with consumer disputes redirected to national and sector-specific ADR bodies, aligned with local legal systems, languages and market realities. This decentralization reflects a departure from a one-size-fits-all approach and recognizes the effectiveness of specialized ADR systems, particularly in e-commerce.
2. The scope of ADR is expanded to cover both domestic and cross-border disputes between

consumers and traders, including disputes arising from digital services and content and cases where consumers provide personal data in exchange for digital services or content. The Directive also aligns ADR more closely with modern e-commerce and cross-border trade by requiring digital accessibility, while still allowing offline access where necessary, and by explicitly recognizing the need for sector-specific dispute resolution expertise.

3. The obligations placed on traders and e-commerce businesses are strengthened. In contrast with the 2013 framework, where enforcement and clarity varied considerably, traders must now clearly inform consumers of the ADR bodies relevant to their specific market and sector. Compliance is no longer limited to referencing a single EU platform but instead requires more precise and market-specific transparency. In addition, traders are expected to respond to ADR requests within defined timeframes, enhancing accountability and reducing the risk of disputes stalling due to inaction.
4. The role of Member States is reinforced, with the Directive encouraging them to actively strengthen, promote and adapt ADR bodies, particularly in sectors generating high volumes of consumer complaints, in this way shifting the focus from formal availability to effective governance.

C. Timeline and Transition

1. The Directive entered into force on 19 January 2026, with full implementation expected by September 2028 following a transposition period.
2. During this transitional phase, businesses should anticipate a period of overlap, in which references to the former ODR framework may coexist with emerging national and sector-specific ADR systems.

D. Practical Implications for E-Commerce Businesses

1. E-commerce businesses should prepare for a more fragmented ADR landscape across the EU which will likely result in updates to terms and conditions, consumer information notices and complaint-handling procedures being needed, and increased interaction with sector-specific ADR bodies.
2. Internal legal and customer service teams may also require training to navigate country-specific dispute resolutions pathways and differing national requirements.

E. Specific Considerations for Greece

1. Until the Directive is transposed into national law, the applicable framework in Greece remains the Joint Ministerial Decision 70330 (Government Gazette B' 1421/09.07.2015) which implemented EU Directive 2013/11.
2. In practice, ADR in Greece has faced challenges, including limited consumer awareness, uneven

trader participation and delays in resolving disputes, particularly in online and cross-border cases.

3. The Directive is expected to have a tangible impact in the Greek context. The shift towards nationally embedded and sector-specific ADR systems aligns with Greece's consumer protection structure and may improve the effectiveness and visibility of ADR mechanisms. Clearer trader obligations to respond to ADR requests within defined timeframes may also address past shortcomings linked to non-participation.
4. Overall, the Directive places greater responsibility on Greek authorities to actively promote and supervise ADR mechanisms, with the potential to strengthen trust in out-of-court dispute resolution and reduce reliance on judicial proceedings.

F. Concluding Remarks

1. The Directive shifts from uniformity and centralization towards practical effectiveness, sector relevance and consumer accessibility in a digital and cross-border economy, with a view to improving trust, participation and outcomes in consumer dispute resolution.
2. Early preparation is essential for businesses operating across multiple EU markets.



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