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**EUROFINAS** / ANNUAL REVIEW

eurofinas

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# 01 | INTRODUCTION

## *Chair's Foreword*

Dear all, It is my great pleasure to present this year's Eurofinas Annual Review. The past year has once again demonstrated how quickly the environment for consumer credit providers is evolving. Geopolitical, regulatory, and market dynamics are reshaping our sector, while households continue to rely on the consumer finance industry for responsible, reliable, and innovative financing solutions.

The 2024 European elections ushered in a new political cycle and have been formative for the political discussions, focuses, and processes in the last year. With the renewed Commission and Parliament, competitiveness and simplification have become central themes. These are long-standing Eurofinas priorities, and our message has been clear : after years of intense rulemaking, Europe must now ensure that the overarching regulatory framework is proportionate, consistent and workable in practice.

At the same time, our industry needs to address broad agenda of initiatives, from the implementation of the new Consumer Credit Directive to reforms in Anti-Money Laundering, Artificial Intelligence, digitalisation and sustainability. These developments represent both challenges and opportunities. Eurofinas is fully engaged in these discussions with the European Institutions, stakeholders representatives as well as consumer representative bodies to make sure that the specificities of consumer credit are understood and that the legislative framework supports financial inclusion and innovation.

Beyond our advocacy, Eurofinas provides a platform for information-sharing, exchange of experience, and collective problem-solving. This cooperation helps our Members anticipate change, navigate complexity, and strengthen their role in enabling access to credit across Europe.

I would like to thank all of our Member Associations and Board Members, and Technical Committe Members for their active engagement and the Eurofinas team for their tireless work. By working together, we will ensure that consumer credit remains a driver of opportunity, resilience, and growth for European households and the wider economy.

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**Bart Vervenne**
Chairman of Eurofinas

# 02

# WHAT IS EUROFINAS?

# 02 | WHAT IS EUROFINAS?

## Our mission

Eurofinas is the voice of consumer credit providers in the EU. Our mission is to represent and promote the interests of our members at international and European level. To achieve this, Eurofinas campaigns for the industry, produces detailed market intelligence and provides a platform for our network to connect. More specifically, Eurofinas' mission is to

- > **represent** the specialised consumer credit industry vis-à-vis the European institutions and other international bodies as a fair and reliable partner and a contact point for key stakeholders
- > **inform** members of all European and/or international developments that may impact their industry
- > **develop** and defend industry positions that are supported by technical research and expertise
- > **produce** detailed statistics on consumer credit in order to i) explain who the Federation represents and its importance in the economy and ii) assess the current state of the market and identify trends
- > **provide** members with a platform to exchange views and best practices; network and meet relevant third parties (EU officials, experts, etc)

## Our governance

Eurofinas is governed by a General Assembly and a Board of Directors. The Chair of the Board is currently Bart Vervenne, CEO Benelux at BNP Paribas Personal Finance. He is supported in this role by Vice-Chairs Umberto Filotto (ASSOFIN, IT), Jens Loa (BFACH, DE) and Ignacio Pla (ASNEF, ES). The Board of Directors is assisted in its work by the Legal and Policy Committee and the Statistics Committee.

## Our team

At Eurofinas, we are a small team of dynamic and committed professionals. We build our work on strong expertise, a European mindset and a sound network.

**RICHARD KNUBBEN**
Director General

**RAFAEL ALARCON ABETI**
Leaseurope Senior Director, Financial Services & Sustainability

**STELLA MITTA**
Senior Legal & Policy Adviser

**STEPHANIE VAN BAKEL**
Adviser, Communications & Public Relations

**MARTINA APICELLA**
Policy Adviser, Mobility

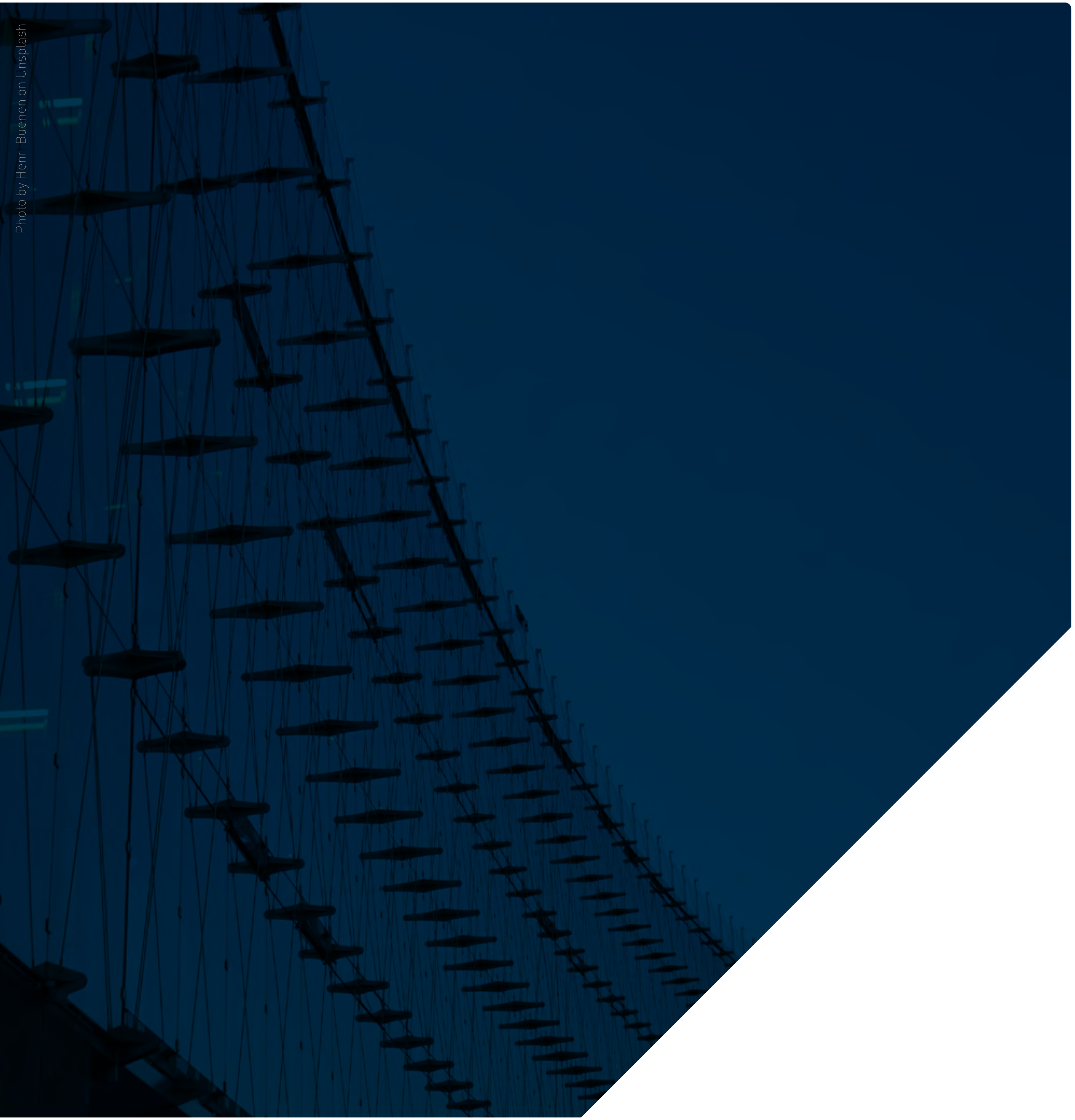
**ISAK BENGTZBOE**
Chief Policy & Legal Adviser

**JULIE DEBRUYNE**
Senior Operations & Events Manager

**TRINH TO NGUYEN BAO**
Adviser, Data & Statistics

**SIMANIS EZERINS**
Adviser, Membership Engagement

**FOR MORE INFORMATION**
Check out our website or contact the Eurofinas team directly




# 03

# CAMPAIGNING FOR THE INDUSTRY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# 03 | CAMPAIGNING FOR THE INDUSTRY

## *Consumer Credit Directive 2 : Supporting members through the transition*

Following the adoption of the revised Consumer Credit Directive (CCD2) in 2023, the focus has now firmly shifted to implementation. Member States are required to transpose the new rules into national legislation by the end of 2025, and draft laws are now under negotiations in several if not all jurisdictions. It is already clear that a number of Member States will not meet the deadline, leaving industry with compressed preparation timelines for the upcoming framework. In this context, Eurofinas is working closely with national associations to coordinate approaches, provide practical guidance, and advocate for consistent and proportionate national outcomes.

The final CCD2 text reflected a number of key Eurofinas priorities, including greater emphasis on proportionality, recognition of digital realities, and adjustments to reflect evolving market practices and market landscape. Given the breadth of the reforms introduced, e.g. enhanced information requirements, stricter creditworthiness standards, and a significantly broader scope, the implementation phase will be pivotal in shaping the future consumer credit landscape.

The Directive also aims to level the playing field between traditional lenders and new market entrants, including Buy Now, Pay Later providers and other digital actors. Yet, the challenge lies in ensuring a both consistent and relevant interpretation/approach across Member States and preventing disproportionate gold-plating, which could undermine legal certainty and fragment the single market. Eurofinas is therefore closely monitoring national processes to identify risks of divergence and to coordinate common industry responses.

At the supervisory level, expectations are evolving in parallel. The European Banking Authority (EBA) is preparing the first major update of its Guidelines on Loan Origination and Monitoring, incorporating changes introduced by CCD2 as well as the forthcoming frameworks on Financial Data Access (FiDA), the Payment Services Regulation (PSR), and the third Payment Services Directive (PSD3). These updates will have a strong bearing on how institutions act on the CCD2 in practice. Eurofinas is actively engaging with the EBA to ensure that requirements remain coherent, proportionate, and operationally feasible for specialised lenders. Particular attention is being paid to aligning supervisory expectations with market realities, including how to address the financing challenges consumers face in the green transition.

*Eurofinas remains committed to supporting its members throughout this complex transition. Alongside targeted advocacy and technical guidance, the Federation continues to provide a platform for peer exchange and best practice sharing. As the 2025 deadline approaches, this collaborative approach will be essential to secure a harmonised and balanced implementation, which upholds consumer protection while enabling innovation and sustainable access to credit across Europe.*

# 03 | CAMPAIGNING FOR THE INDUSTRY

## *Financial Data Access : Addressing the issues*

The European Commission's Financial Data Access (FiDA) proposal, published in 2024, was presented as the natural next step after PSD2 and the open banking revolution, expanding the concept towards open finance. Its ambition is to broaden consumer access to and control over financial data, enabling information to be securely shared with third-party providers beyond payments. In doing so, the Commission hopes to unlock a new wave of innovative services, foster competition, and drive greater personalisation across the financial sector.

This notwithstanding, the proposal raises serious concerns. From the outset, questions have been raised about proportionality, technical feasibility, and the overall business case. For consumer credit providers in particular, the added value of FiDA is unclear: much of the relevant data is already available under existing frameworks, and the proposal risks creating overlapping obligations without providing new tools to improve creditworthiness assessments or affordability checks. For consumers, too, the expected benefits remain uncertain. The proposal foresees significant investment in new infrastructure, particularly data-sharing APIs and permission dashboards, that could cost the industry billions without a clear return. Experience from Australia illustrates the risks: heavy investments were made by providers, yet consumer uptake and demand remained minimal.

Political support has been mixed. In preparing its 2025 Work Programme, the Commission actively considered withdrawing the proposal, citing feasibility concerns and misalignment with its competitiveness and simplification agenda. Ultimately, it was retained, largely due to the strong backing of Financial Services Commissioner Albuquerque, who has made FiDA a personal priority, and continued political momentum in the European Parliament. This determination to push ahead stands in contrast to broader institutional efforts to streamline regulation and strengthen competitiveness. Negotiations between the co-legislators are now underway, with many Member States in the Council calling for significant clarification and rebalancing of the text in order to bring it forward in a more realistic manner.

For industry, however, key issues remain unresolved. Eurofinas and other stakeholders have, beyond the fundamental lacking impact assessment behind the Commission´s proposal, highlighted the lack of clarity on governance structures, liability allocation, and compensation for mandatory data sharing, alongside the absence of realistic timelines. The technical standards for interoperability, such as common APIs and dashboards, are undefined, leaving firms unable to plan investments. Fundamentally, the proposed implementation calendar is widely regarded as unrealistic and unworkable. Eurofinas has consistently advocated for a phased and pragmatic approach that in line with concrete and real market demands.

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### *Payment Services framework evolves*

Eurofinas is actively engaging in the ongoing review of the EU payment services framework, currently under negotiation between the legislators. The reform moves from the existing Payment Services Directive 2 (PSD2) towards a dual regime consisting of a directly applicable Payment Services Regulation (PSR) and a new Payment Services Directive (PSD3). Of particular concern are provisions introducing separate rules for the provision of credit, which risk creating unnecessary complexity and regulatory fragmentation. Such an approach runs counter to the Commission's simplification agenda and undermines the coherence achieved with the recently agreed CCD2. For consumer credit providers, consistency and legal certainty across EU frameworks remain essential.

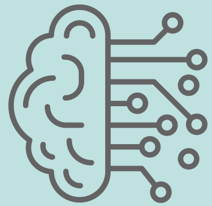
# 03 | CAMPAIGNING FOR THE INDUSTRY

>> Another major concern is the interaction of FiDA with existing EU rules. Overlaps with GDPR, the AI Act, and sector-specific legislation such as the Consumer Credit Directive (CCD2) risk creating a patchwork of obligations that undermine legal certainty, raise compliance costs, and generate fundamentally conflicting objectives. Not to mention, gold-plating of said pieces of legislation at national level only exacerbates this problem. Financial institutions face duplication of effort and regulatory inconsistencies that would ultimately harm both consumers and providers. Eurofinas is therefore urging the co-legislators to take a holistic perspective, embedding FiDA coherently within the EU's wider digital and data strategy.

Looking ahead, consumer organisations are expected to play a bigger role in the set-up of the governance and data-sharing schemes. Eurofinas stresses that while consumer empowerment is central to FiDA's rationale, the stakeholders required to make the substantial investments must remain at the centre of decision-making. If consumer groups are given disproportionate influence, the outcome risks being detached from technical realities and market feasibility. Excessive or impractical obligations would deter innovation and limit the very benefits FiDA is meant to deliver.

Eurofinas remains deeply engaged throughout the negotiations. The Federation supports the overarching aim of giving consumers greater control over their financial data but insists that this must be achieved through realistic timelines, clear governance, and proportionate obligations.

## *AI Act : High risk of overreach*



The EU's Artificial Intelligence Act entered into force in August 2024, marking a milestone in digital regulation after long but sometimes hasty negotiations. As the world's first attempt at a comprehensive AI law, it introduces a tiered risk-based framework, with the strictest requirements applying to so-called "high-risk" AI systems. For the consumer credit industry, the Act explicitly classifies credit scoring and creditworthiness assessments as high-risk, resulting in extensive obligations for key processes. These include risk management, data governance, documentation, transparency, and human oversight requirements. While intended to strengthen consumer protection, such measures translate into significant compliance costs and operational adjustments under tight deadlines.

Still, major uncertainties remain. The Act's horizontal nature and rapid adoption left important concepts both intentionally and unintentionally vague, such as what qualifies as "sufficient transparency" or "effective human oversight." Even the basic definition of an AI system remains subject to on-going discussions, despite guidelines on the matter being issued earlier in 2025.

Many lenders rely on traditional statistical models, such as logistic regression. They have long been recognised by supervisors as compliant and transparent tools for creditworthiness assessments. Eurofinas has consistently argued that these models should be excluded from the AI Act's scope. Treating them as "AI systems" would misdirect supervisory resources and impose unjustified burdens on providers that use proven, reliable, and explainable techniques. While initial guidance published in early 2025 provided some reassurance, ambiguity persists, creating legal uncertainty at a time when firms must make strategic decisions. Another major concern is the breadth of the

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# 03 | CAMPAIGNING FOR THE INDUSTRY

## *AML PACKAGE : Pushing for new rules fit for reality*

The EU's AML reform package represents the most significant overhaul of the Union's anti-money laundering and counter-terrorist financing (AML/CFT) framework in more than a decade. It responds to long-standing criticisms of fragmented national approaches, inconsistent supervision, and gaps in cross-border cooperation. The reform establishes a single rulebook through a new AML Regulation, revises the AML Directive to strengthen coordination at national level, and expands the scope of obliged entities. Together, these measures aim to close loopholes, improve transparency, and ensure a uniform level of protection across the EU.

Central to the package is the creation of the Anti-Money Laundering Authority (AMLA), which will assume direct supervisory powers over high-risk financial institutions and coordinate national supervisors. While Eurofinas supports the objectives of supervisory convergence and effective oversight, the proposed rules raise concerns about operational complexity and disproportionate data requirements for low-risk sectors.

New technical rules developed by the European Banking Authority (EBA) would significantly expand data collection obligations, increasing the number of reporting points from a few dozen to more than eighty. For consumer credit providers—particularly those focused on low-risk products—this level of granularity is difficult to justify. Eurofinas has consistently together with other federations of the European Banking Industry Committee (EBIC) advocated for a proportionate, risk-based application of AML rules that avoids duplication and minimises disruption to the consumer journey. With the AML package expected to apply in full by 2027, there remains scope to shape its practical rollout. Eurofinas continues to work with policymakers to ensure that the final framework balances harmonisation with flexibility, delivering effective AML oversight without undermining efficiency, consumer experience, or innovation.

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"high-risk" classification across the credit lifecycle. Eurofinas has advocated for a more targeted interpretation that limits the designation strictly to creditworthiness assessments. Expanding the scope to other applications would risk disproportionate compliance requirements and could stifle innovation. Full compliance for high-risk systems is foreseen by August 2026, though even within the European Commission questions remain about the feasibility of this deadline. With multiple delegated acts, standards, and guidelines still to be developed, the implementation phase of the AI Act is far from complete.

Eurofinas, together with an alliance of partners in the financial services field, is actively engaged in shaping these processes. A core priority is ensuring coherence with existing frameworks such as the General Data Protection Regulation (GDPR) and consumer protection law, which already grant rights to explanation, human review, and transparency. The CCD2 already introduces enhanced obligations for creditworthiness assessments, including stricter data requirements and stronger information standards. Unless carefully coordinated, the AI Act risks duplicating or even conflicting with these rules, creating overlapping duties for firms and additional costs without delivering greater consumer protection.

The federation will continue to advocate for proportionate, workable solutions that safeguard consumers without undermining innovation through regulatory overreach.

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# 03 | CAMPAIGNING FOR THE INDUSTRY

## *Consumer protection : Revamped strategy and focus on digital fairness*

The European Commission's upcoming 2025–2030 Consumer Agenda reflects a continued focus on addressing perceived pitfalls for consumers linked to digitalisation, the rising cost of living, and the green transition. The Agenda is expected to introduce additional rules governing digital interactions between consumers and businesses, strengthen sustainability requirements, and provide targeted support for vulnerable consumers.

A flagship initiative under this Agenda is the forthcoming Digital Fairness Act (DFA), aimed at closing regulatory gaps in the digital economy. The DFA will target manipulative online practices such as dark patterns, misleading influencer marketing, and opaque algorithmic profiling.

From the perspective of the consumer credit industry, the DFA could have far-reaching implications. Digital interfaces are central to credit distribution and customer communication, and any new restrictions on user journeys, consent mechanisms, or interface design must be considered against the backdrop of existing frameworks—such as consumer protection legislation, the GDPR, the AI Act, and sector-specific rules. Eurofinas is therefore advocating for regulatory coherence to avoid excessive complexity, duplication, and uncertainty in the provision of consumer credit.

In particular, the potential overlap between the DFA and existing legislation must be managed with care. Eurofinas is closely monitoring the preparatory work and engaging with the European Commission to ensure sector-specific realities are taken into account.

Eurofinas also supports the broader objectives of the Consumer Agenda; improving transparency and strengthening consumer choice in the green and digital transitions. At the same time, the Federation cautions against a one-size-fits-all approach: consumer credit is already one of the most regulated retail financial products. Any additional rules must build on existing safeguards while leaving space for innovation, competition, and effective consumer outcomes.

## *Rethink of digital rules?*

In its 2025 Work Programme, the European Commission announced a comprehensive fitness check of the EU's digital rulebook, part of its broader effort to, once again, boost competitiveness and simplify regulatory requirements. The review will cover some of the most important pieces of digital legislation adopted in recent years, including the General Data Protection Regulation (GDPR), the Data Governance Act, the AI Act, and the Digital Services and Digital Markets Acts. Its main objective is to identify overlaps, gaps, and sources of unnecessary complexity.

For the consumer credit industry, the exercise is viewed as an essential pillar. Over the past decade, a large number of new digital rules have been introduced in quick succession, often with limited assessment of their (combined) impact. This has created a patchwork of requirements, and that, in some cases, risk duplicating or even contradicting each other. From Eurofinas' perspective, the fitness check represents the type of impact assessment that should have been carried out before these rules were first tabled, and is the opportunity to take stock and adjust course.

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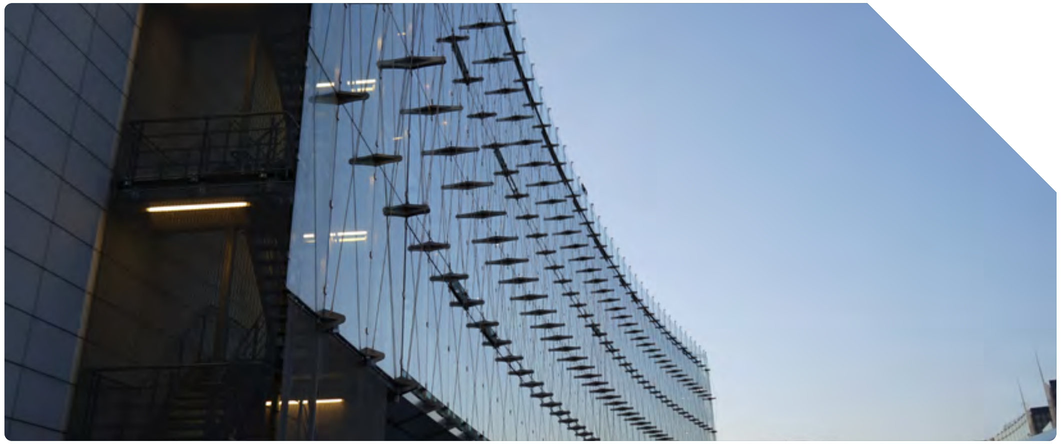
>> The review is particularly important for highly regulated sectors such as the consumer credit sector and the broader financial services industry, where compliance obligations are already extensive. It provides a chance to recalibrate, ensuring that the EU's digital framework remains fit for purpose in a rapidly evolving technological environment. For Eurofinas and its Members, the priorities are clear: greater legal certainty, greater consistency, and proportionate rules for low-risk activities that do not warrant heavy regulatory treatment.

Eurofinas believes that a well-balanced framework can both safeguard consumers and enable the development of responsible, data-driven financial services. Getting this balance right will be essential to foster innovation, strengthen Europe's competitiveness, and ensure that households continue to have access to affordable credit. The fitness check will therefore remain a central focus for Eurofinas, its Member Associations, and the work of its Committees and Task Forces now and in the year ahead.

## *New mandate : a chance for competitiveness & simplification ?*



The 2024 European elections ushered in a new political landscape, with a reshaped European Parliament and a renewed mandate for the von der Leyen Commission under a fresh set of overarching priorities. Alongside the many legislative files currently under discussion, the political momentum now revolves around two recurring themes: competitiveness and simplification. Both draw heavily on the reports of former Italian prime ministers Enrico Letta and Mario Draghi on the Single Market and European competitiveness. While the rhetoric has gained traction in Brussels, the question remains whether it will translate into a genuine departure from the past decade's emphasis on extensive and overbearing rulemaking.

For the financial sector, this new focus is strongly welcomed. In recent legislative cycles, consumer credit providers and other financial actors have been confronted with a surge of new and frequently overlapping obligations, ranging from the AI Act and GDPR to sustainability requirements and supervisory reforms. Too often, these initiatives have been adopted without sufficient consideration of their cumulative effects or tangible added value, leading to rising compliance costs and, in many cases, significant legal uncertainty and/or inconsistencies.

So far, however, concrete change has been limited. The Financial Data Access (FiDA) proposal, for example, was the subject of far-reaching >>

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# 03 | CAMPAIGNING FOR THE INDUSTRY

>> discussions about its purpose and alignment with the new priorities. Proposed to be withdrawn, it was ultimately preserved, largely thanks to the intervention of Finance Commissioner Maria Albuquerque. The episode illustrates both the political sensitivity surrounding financial services legislation and the difficulty of turning calls for simplification into genuine policy restraint.

Against this backdrop, the European Commission has tabled the first set of so-called Omnibus Directives, intended to streamline and recalibrate existing EU rules. Their objective is to correct inconsistencies, eliminate duplications, scale back disproportionate demands, and better align sectoral legislation with today's policy priorities. Several packages have already been presented, with additional proposals expected in late 2025 and early 2026, including a much-needed overhaul of the EU's digital rulebook. In parallel, the European Supervisory Authorities (ESAs) and the European Central Bank (ECB) are pursuing complementary initiatives on supervisory convergence, reporting simplification, and the reduction of unnecessary regulatory burdens. While all these initiatives hold the potential to deliver meaningful improvements, their real impact will only become evident once the legislative process runs its course.

For Eurofinas, the Omnibus Directives represent a clear opportunity. The Federation has long argued for stronger impact assessments, more consistent enforcement of existing rules, and a systematic review of the legislative acquis to ensure that EU frameworks truly deliver on their objectives. The priority now is to ensure that simplification does not remain an empty promise, but results in tangible improvements for specialised consumer credit providers. If designed and implemented effectively, the Omnibus Directives could mark an important first step in that direction. Eurofinas will continue to press for a competitiveness check at the heart of EU law-making, ensuring that the goal of simplification is translated into practice.

**TRANSPORT POVERTY AND AFFORDABILITY TOOLS; THE ROLE OF CONSUMER FINANCE**

In May 2025, the European Commission issued a Recommendation on transport poverty that stops short of binding legislation, rather it sets out what Member States should do.

Transport poverty in the European Union refers to people's difficulty in paying for transport or their lack of reliable access to the mobility they need to reach essential services and daily activities. The EU frames the issue around three core dimensions—affordability, availability, and accessibility—with the practical add-on of adequacy or usability (whether the service actually meets people's needs). This definition allows policymakers to look beyond simple fare levels and consider where services run, how often, how safely, and whether they connect to jobs, schools, healthcare, and other essentials.

The Recommendation urges countries to identify vulnerable groups and underserved areas—such as rural regions, islands, and outermost territories—and to design targeted measures. These can include cheaper or more frequent public transport, demand-responsive services, support for shared and active mobility, and steps that improve access to zero-emission mobility like social leasing schemes, better charging/refuelling infrastructure, and a healthier second-hand market for clean vehicles.

The main funding instrument is the Social Climate Fund (SCF), which was originally designed to cushion the social impacts of the new emissions trading system for road transport and buildings, and it pairs EU money with national co-financing. To access it, each Member State must submit a Social Climate Plan setting out concrete measures, targets, and milestones. Funding can support both structural actions—like investing in public transport or safe cycling networks—and temporary direct income support where that's needed to bridge affordability gaps.

# 03 | CAMPAIGNING FOR THE INDUSTRY

**URSULA VON DER LEYEN**
President of European Commission

## *Consumer finance as a facilitator*

**TO HELP GOVERNMENTS DESIGN EFFECTIVE INTERVENTIONS, THE COMMISSION IS WORKING ON A WIDE SET OF TOOLS AND GUIDANCE NOTES. IN THIS WORK ,EUROFINAS IS ENGAGING WITH ALL RELEVANT DEPARTMENTS AND COMMISSIONERS TO OUTLINE THE ROLE CONSUMER FINANCE CAN PLAY IN THIS REGARD.**

**TERESA RIBERA**
Executive Vice-President for a Clean, Just and Competitive Transition

**APÓSTOLOS TZITZIKÓSTAS**
European Commissioner for Sustainable Transport and Tourism

**WOPKE HOEKSTRA**
Commissioner for Climate, Net Zero and Clean Growth

**STÉPHANE SÉJOURNÉ**
Executive Vice-President for Prosperity and Industrial Strategy

Consumer finance plays a crucial role in supporting consumers and SMEs to finance the energy transition in the widest sense possible, which also covers mobility solutions. In 2024, Eurofinas Members provided almost €100 billion in car financing. Consumer finance plays an instrumental role in enabling consumers to acquire Low and Zero Emission vehicles, either new or used, with over 80% of European consumers buying predominantly used vehicles. Enabling the acquisition of the latter, supports both the necessary transition but also European households´ transport needs when they may be unable or unwilling to buy expensive EVs.

The reality today is that the vast majority of second hand BEVs are offered at beyond the spending reach of most consumers, despite their large drop in residual values. In the new vehicle segment, this problem is obviously even greater as, despite the fact that battery prices have been coming down, this is not reflected in list prices.

Eurofinas argues that rather than focusing a variety of subsidy programs on primary sales, successful uptake of lower and zero emission vehicles starts with a healthy consumer demand in the second hand market. Subsidies or other support measures made available to bridge the gap between prices and loan thresholds could go a long way in supporting the transition. A well functioning second hand market is also an absolutely prerequisite ensuring other types of initiatives being reviewed by the European Commission such as social leasing programs are effective.

### SOCIAL LEASING

In its work, the Commission is commonly referring to the concept of social leasing. Used without much distinction, it is a public policy tool that lets low- and middle-income households use a new, or nearly new, vehicle (increasingly an electric one) through a subsidised lease or loan rather than buying it outright. Instead of needing a large down payment or taking a full-price loan, the household pays a reduced monthly fee for a fixed term—typically two to four years—and the state covers part of the cost or de-risks the financing for the lender.

Despite the term, social leasing is in fact a misnomer as many social leasing programs already deployed, or under development, in fact cover B2C finance agreements rather than leases, and are also treated as such from a prudential perspective. As these types of arrangements are fully covered by the CCD2, Eurofinas has sought clarification of thought from the European Commission as to better understand how some of the proposed support components such as state guarantees would interact with key elements of the consumer credit framework, e.g. the Credit Worthiness Assessment provisions or the European Banking Authority's Loan Origination Guidelines.

Commission President, Ursula Von der Leyen, also referenced social leasing programs as a 'targeted affordability tool' in her 2025 State of the Union address, where she announced that the European Commission would work with industry on a "Small Affordable Cars" initiative. The aim is to bring low-cost, lightweight electric vehicles to market, built in Europe, to accelerate electrification and strengthen competitiveness.

## *Securitisation : Promoting securitisation opportunities for consumer credit companies*

When the European Commission has published this year a package of measures to make the EU securitisation framework simpler and more fit for purpose, the proposals included key points jointly raised previously to the European Commission by Leaseurope and Eurofinas.

The proposed measures seek to facilitate securitisation activity in the EU while continuing to safeguard financial stability. A stronger and simpler securitisation framework can help channel more investments into the real economy – supporting economic growth, innovation and job creation across the EU. This review is the first legislative initiative proposed under the savings and investments union (SIU) strategy.

The proposals include amendments to the Securitisation Regulation, Capital Requirements Regulations (CRR III), Liquidity Coverage Ratio (LCR) Delegated Regulation and Solvency II (Prudential treatment of insurance companies).

Key changes in line with points we had raised include a more principles-based and proportionate approach to due diligence, simplified reporting requirements, a new definition of public securitisation, lower capital requirements for banks holding securitisations positions, better liquidity treatments for securitisations in the LCR, and lower capital required for insurance companies investing in securitisation.

Leaseurope and Eurofinas are analysing the proposals and will produce amendments to the legislative texts in order to ensure the final framework will fit the specifies of securitisations issued by leasing and consumer credit companies.

**SECURITISATION**
The process by which both banks and non-bank finance companies can sell their consumer finance books to release capital for more lending, is highlighted in the European Commission's Competitiveness Compass as a key enabler of increased business investment in Europe. While take-up by European consumer credit companies is growing, Eurofinas considers it is essential that changing regulations continue to fit consumer finance.

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Photo by Scott Graham on Unsplash

# 04

# DELIVERY MARKET INSIGHT

# 04 | DELIVERING MARKET INSIGHT

*We publish regular statistics to provide our members with a unique source of data to :*

**TRACK MARKET TRENDS**

**SUPPORT ADVOCACY WORK**

**BENCHMARK PERFORMANCE**

## *Annual & biannual surveys*

Eurofinas' main statistical publications provides in-depth information on the activities of consumer credit providers in Europe. They cover all aspects of consumer credit on both a national and pan-European level and include figures and trends on new credit granted and outstanding credit.

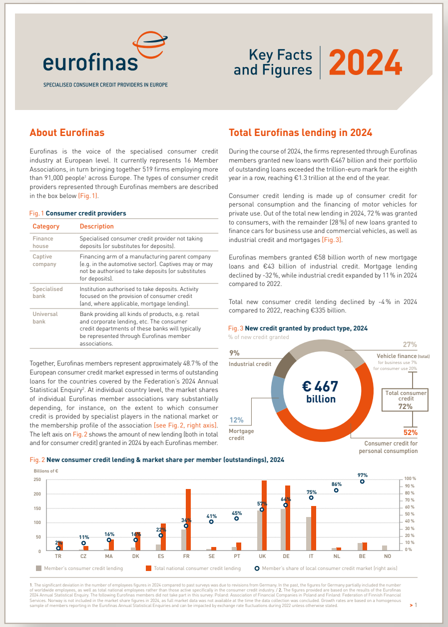
A new set of questionnaires focusing on consumer credit supporting green investments such as electric and hybrid vehicle purchases, along with household investments in energy efficiency, has already been introduced in this year's Annual Statistical Survey. This section aims to promote the role of consumer credit in facilitating green investment of households.

## *Quarterly enquiries*

The Quarterly Statistical Enquiry is a brief survey of member associations' quarterly figures, including new business for personal consumption and consumer car finance. It provides a timely estimate of main business trends in the consumer credit industry.

## *Facts & Figures*

An annual snapshot of the Eurofinas market outlining the major trends in consumer credit lending. Designed for easy distribution, the 'Facts and Figures' report is used by our members and our team to provide stakeholders with a brief explanation of the market..




# 05

# STATE OF THE MARKET

# 05 | STATE OF THE MARKET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## 2024 Marked a Recovery for European Consumer Credit

In 2024, members of Eurofinas[1] granted €484 billion in new loans, marking a 3.2% increase from the previous year.[2] Findings from the Eurofinas 2024 Annual Survey reveal that most lending segments expanded, while industrial credit was the only segment to decline.

Overall, total new consumer credit lending[3] grew in new business finance by 3.5% in 2024 compared to 2023. Other lending categories - namely business vehicle finance, industrial credit, and mortgages - accounted for 28% of total new business, and within this segment, business vehicle finance grew by 6.9% and mortgages by 8.3%, whereas industrial credit dropped by -9.3% in terms of newly granted amounts.

Personal loans and revolving credit stood out as the leading products, together accounting for over 42% of all new credit issued. Personal loans saw robust growth of 9.6%, revolving credit rose by 1.6%, and non-automotive point of sale financing posted a slight 0.9% increase.

In 2024, consumer vehicle finance showed stronger results for new cars than for used ones. Financing for new consumer cars increased by 2.8%, while for used consumer cars declined slightly by -0.7%. The other vehicles category, including motorbikes and caravans, recorded the largest gain, with new credit granted rising by 10.9%. A similar trend was observed in the business vehicle market. Lending for new business cars grew sharply by 11.3%, whereas for used business cars fell by -4.4%. Commercial vehicles finance also expanded with a growth of 7.4%.

In 2024, most national consumer credit markets represented by Eurofinas members reported growths in new credit granted. However, Belgium, Norway, France, Spain, and Denmark recorded declines in new credit granted, ranging from -0.5% to nearly -6% compared with 2023.

## Recovery in Consumer Credit Supported by Confidence and Lower Rates

Consumer credit growth rebounded in 2024 compared to 2023, supported by lower interest rates, a slight tightening of financing conditions, and a gradual improvement in consumer confidence. The increase in new consumer credit was broadly observed across most national markets and product categories.

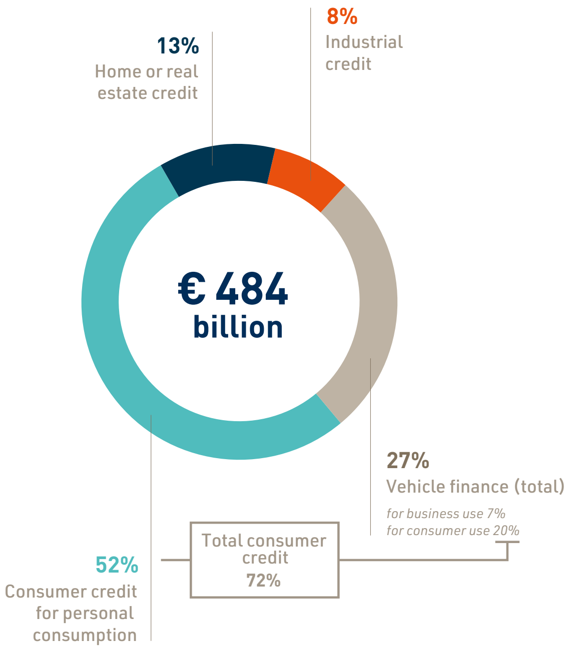
In 2025, private consumption is forecast to benefit from increasing real wages and employment, alongside slightly improved access to credit, particularly for households. Nevertheless, growth in consumption is expected to remain below pre-pandemic levels as both consumers and lenders remain cautious amid persistent global uncertainties and heightened inflation risks. Overall, monetary policy remains focused on striking a balance between supporting economic recovery and maintaining price stability.[4]

1. The following Eurofinas members took part in the survey: UPC/BVK (BE), CLFA (CZ), BFACH (DE), Finans og Leasing (DK), ASNEF (ES), ASF (FR), ASSOFIN (IT), APSF (MA), VFN (NL), FINFO (NO), ASFAC (PT), Finansbolagens Förening (SE), AFI/FKB (TR), FLA (UK).
2. The growth rates shown are nominal i.e., not adjusted for inflation and can be impacted by exchange rate fluctuations.
3. Total consumer credit includes consumer credit for personal consumption (including personal loans, revolving credit, and non-automotive point of sale finance) and consumer point of sale vehicle finance.
4. European Economic Forecast, Spring 2025.

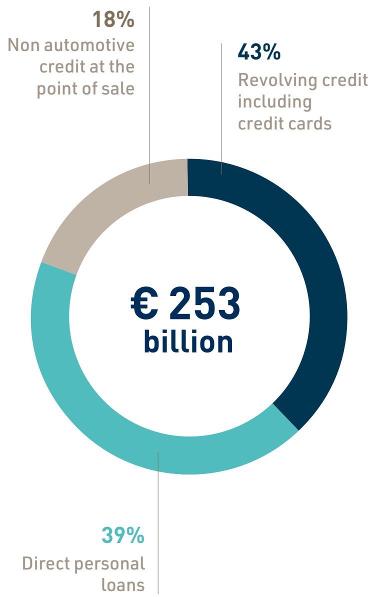
# 05 | STATE OF THE MARKET

## *2024 in statistics*

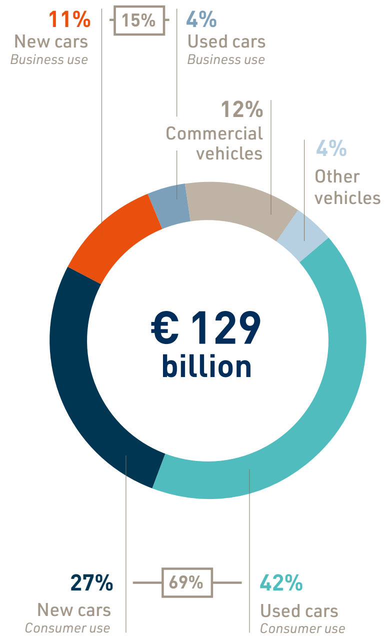
### 1. NEW CREDIT GRANTED BY MAIN PRODUCT
*% of new credit granted*




### 2. CONSUMER CREDIT FOR PERSONAL CONSUMPTION
*% of new credit granted*



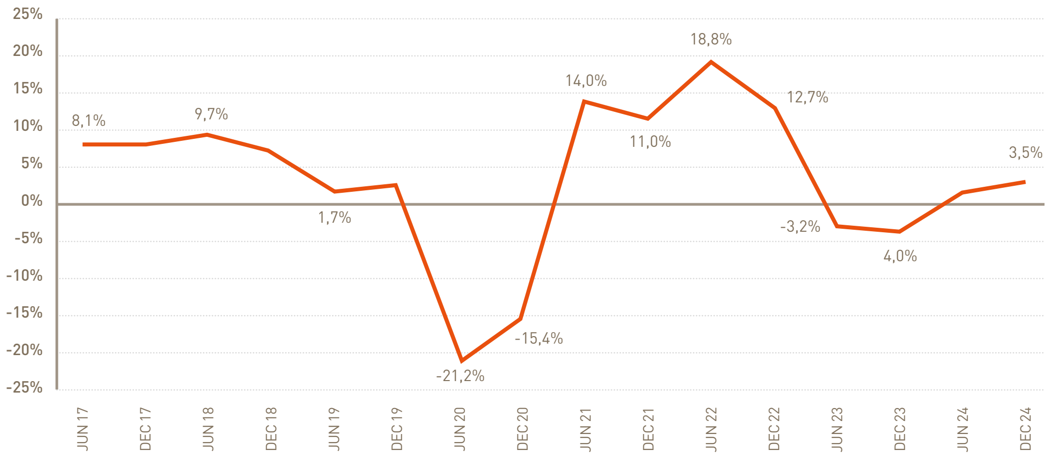

### 3. VEHICLE FINANCE, NEW LENDING BY PRODUCT TYPE
*% of new credit granted*



# 05 | STATE OF THE MARKET

## *2024 in statistics*

### 4. TOTAL NEW CONSUMER CREDIT, 2017-2024

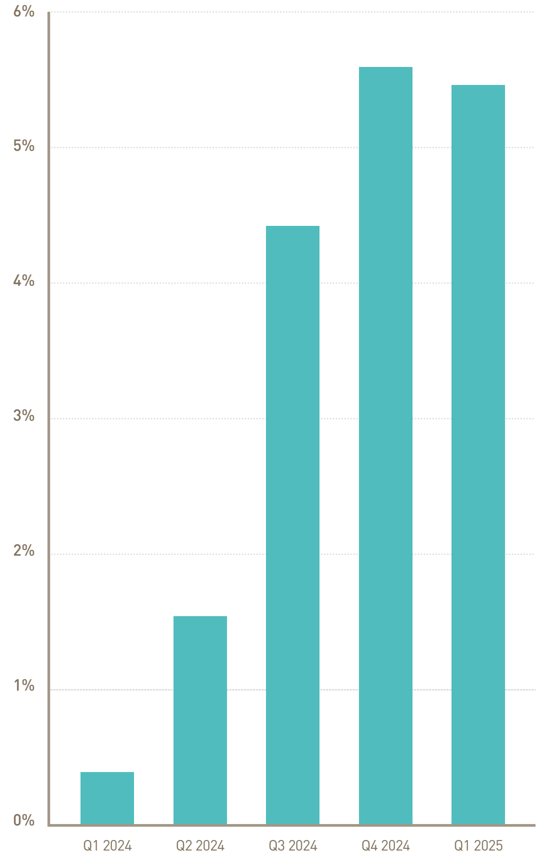



## *Average loans size in 2024*

| Personal loans | Credit at the point of sale | New consumer cars | Used consumer cars |
|---|---|---|---|
| **€ 12 400** | **€ 808** | **€ 26 962** | **€ 17 100** |

### 5. TOTAL NEW CONSUMER CREDIT 2024 (FOR PERSONAL CONSUMPTION AND CONSUMER CAR FINANCE)

*% change compared to the same period a year ago - adjusted for exchange rate fluctuations*



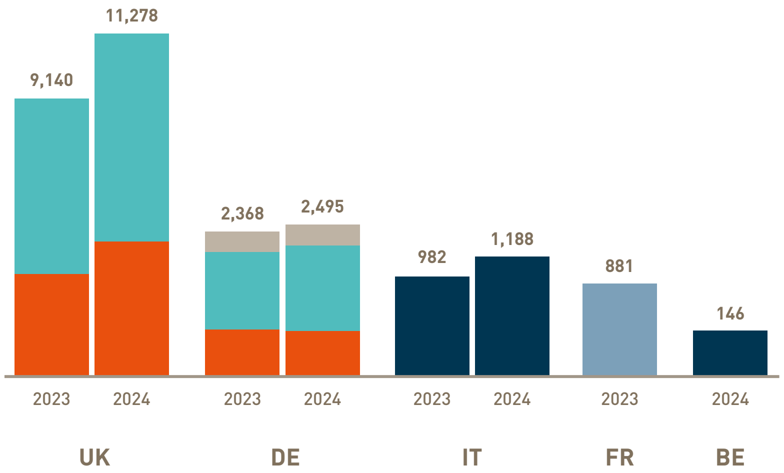
# 05 | STATE OF THE MARKET

## *2024 in statistics / Green consumer credit statistics 2024*

**GREEN MOBILITY**

*(include hybrid & BEV cars & other green vehicle types)*

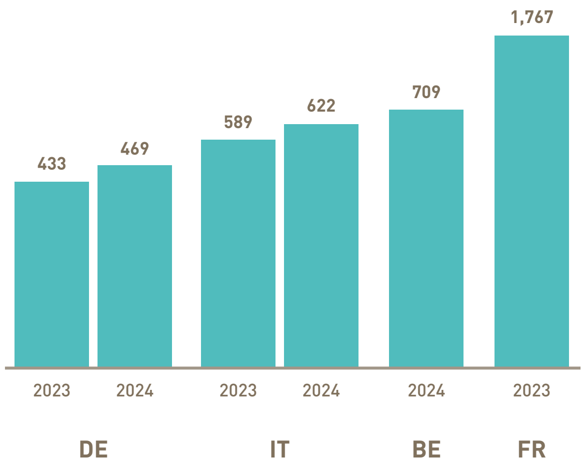
***New credit granted (M€)***




- Full battery electric cars
- Plug-in hybrid & other powertrain cars
- Other green vehicles (e.g., e-scooters, e-bycicles, etc.)
- Plug-in hybrid cars <50g $CO_2$/km
- Full battery electric & plug-in hybrid cars

**GREEN PURCHASE OF HOUSEHOLDS**

*(include energy-efficient home renovations & other green purchases)*




- Loans for energy-efficient home renovations

# 05 | STATE OF THE MARKET

## *Key economic indicators*

**Consumer confidence** level increased further and is approaching its long-term average

*Flash Consumer Confidence Indicator – July 2025*

↑

**Supply of loans** reported credit standards for consumer credit and other lending to households are expected to be tighten in Q3 2025

*ECB Bank Lending Survey July 2025*

↑

**Inflation** as measured by the Harmonised Index of Consumer Prices (HICP) is projected to further moderate, reaching about 2.1% in 2025 and falling to 1.7% in 2026

*European Commission, Spring Economic Forecast 2025*

↓

The **European Central Bank** lowered the marginal lending facility rate from 2.65% in June 2025 to 2.40% in September 2025

*ECB*

↓

**Loan demand** for consumer credit and other lending to households is expected to be broadly unchanged in Q3 2025

*ECB Bank Lending Survey July 2025*

=

**Private consumption** is projected to grow by 1.5% in 2025, slightly higher than previously anticipated

*European Commission, Spring Economic Forecast 2025*

↑

# 06

# PROVIDING A PLATFORM

# 06 | PROVIDING A PLATFORM

*Our mission is not limited to advocacy; it also focuses on cultivating a collaborative community of industry specialists.*

*We enable the exchange of vital information on national implementation measures and other key developments, offering members and the broader sector a forum to connect, share expertise, and work together toward common ambitions.*

## Member meetings

The Board of Eurofinas sets our strategy for the road ahead and guides the Federation's activities, also engaging with key EU decision-makers when relevant. Under the Board's oversight, Eurofinas's technical committees met regularly and worked on the new Consumer Credit Directive and the related national implementation processes, the green transition and sustainable finance, AI, and insurance distribution related work of the European supervisory authorities.

We would like to take this opportunity to thank all our full, correspondent and associate members for your support this year. Your contributions have made a huge impact on the work of the Federation and benefitted the entire sector.

**THANK YOU ALL FOR YOUR DEDICATION.**

## European industry cooperation

Eurofinas remains an active member in many key European-level bodies. This includes the European Banking Industry Committee (EBIC), where Eurofinas manages the Consumer Credit Working Group, and the Centre for European Policy Studies (CEPS).

Isak Bengtzboe, the Federation's Chief Policy & Legal Adviser, serves as a member of the European Banking Authority's Banking Stakeholder Group, a crucial advisory body within the European Authority.

Our involvement links us and our members with the wider financial services industry, regulators, and other stakeholders.

# 06 | PROVIDING A PLATFORM


*Eurofinas' many networks, partnerships and platforms create a vibrant European consumer credit community, which is clearly the place where the European profession comes together and connects.*

## ANNUAL CONVENTION OF THE EUROPEAN CONSUMER CREDIT INDUSTRY

The Eurofinas Annual Convention is widely regarded as the leading yearly gathering for the European consumer credit sector, and it remains the only event of its kind organised by the industry at the European level. It is held at the same time and place as the Annual Convention of the European leasing & automotive rental industry, organised by sister federation Leaseurope, to maximise networking opportunities.

Our last convention in Alicante brought together around 400 industry leaders from more than 30 countries, reinforcing its reputation as the must-attend event for the European consumer credit industry. Most attendees are senior executives and CEOs, making it the perfect setting for high-level networking and industry insights.

Visit our convention website to learn more about the programme, exciting line-up, and sponsors for our 2025 Annual Convention, taking place in Cascais, Portugal, on 9 & 10 October.

**400+** participants

leading gathering platform for our industry at European level

**40+** speakers and moderators

**30+** countries represented

**9** sessions to choose from

*A must attend event in the business leader's agenda, with the right balance between powerful content and high-level networking.*

*"The Eurofinas Convention is one of the most relevant events for the specialised finance and consumer credit sector, bringing together European leaders, regulators, academics, and market experts.At this event, participants will learn about and discuss the main trends and challenges shaping the future of the European financial market; engage in strategic debates on regulatory issues, digital innovation, sustainability, and new consumer dynamics; and take advantage of the ideal opportunity to connect with representatives of financial institutions, peer associations, and top-level decision-makers across Europe. The Convention gathers hundreds of representatives from financial institutions throughout Europe, as well as specialists in various areas of specialised credit, providing an important platform for sharing experiences, discussing trends, and developing initiatives at the European level, through a wide range of presentations, discussions, and reflections.*

*The choice of Portugal to once again host this Convention reflects the success of previous editions held in our country.*

*Once again, the Portuguese climate, cuisine, and hospitality have contributed to this event taking place at the outstanding Hotel Miragem in Cascais, in this fantastic location.*

*As leaders in the industry, we are delighted to welcome our European colleagues to an environment that inspires both meaningful dialogue and strong collaboration.*

*Together with Leaseurope and Eurofinas, we are dedicated to making your experience in Cascais both enriching and memorable."*

**Duarte Gomes Pereira**
Secretary General, ASFAC

# 07

# OUR MEMBERS

# 07 | OUR MEMBERS

## *Member associations*

Eurofinas is composed of 16 Member Associations, covering 16 countries, and brings together more than 650 consumer credit firms.

## *Members*

**BELGIUM**
Union Professionnelle du Crédit - UPC /
Beroepsvereniging van het Krediet - BVK

**CZECH REPUBLIC**
Czech Leasing & Finance
Association - CLFA

**DENMARK**
Finans og Leasing

**FINLAND**
Finance Finland - FFI

**FRANCE**
Association Française
des Sociétés Financières - ASF

**GERMANY**
Bankenfachverband

**ITALY**
Associazone Italiana del Credito
al Consumo e Immobiliare - ASSOFIN

**MOROCCO**
Association Professionnelle des
Sociétés de Financement - APSF

**NETHERLANDS (THE)**
Vereniging van
Financieringsondernemingen
in Nederland - VFN

**NORWAY**
Finansieringsselskapenes Förening

**POLAND**
Association of Financial
Companies in Poland - ZPF

**PORTUGAL**
Associação de Instituições
de Crédito Especializado - ASFAC

**SPAIN**
Asociación Nacional de
Establecimientos Financieros
de Crédito - ASNEF

**SWEDEN**
Finansbolagens Förening

**TURKEY**
Finansal Kurumla Birligi – FKB

**UNITED KINGDOM**
Finance & Leasing Association - FLA

# 07 | OUR MEMBERS

## *Associate members*

**WELCOMING NEW ASSOCIATE MEMBER**

Eurofinas was very pleased to welcome **Cox Automotive** as new associate members this year, thereby consolidating an already strong and committed group of service providers to the industry.

With this new member, Eurofinas now benefits from the support of 8 companies from a variety of horizons across Europe

The Eurofinas 2025 associate members are :

BNP PARIBAS CARDIF

COX AUTOMOTIVE

CRIF Together to the next level

EQUIFAX

FICO

Kereis

monthio

QuickSign

### *Cox Automotive*

Cox Automotive is the global industry leader in connected automotive services for manufacturers, fleets, lenders and retailers. We connect human intelligence, digital innovation and physical services to simplify the automotive landscape. Our solutions are trusted, innovative and backed by decades of experience, helping customers reach their goals, now and in the future. Our integrated digital retail solutions connect vehicle manufacturers, retailers and lenders to help customers buy, finance and sell vehicles more easily; delivering a truly omni-channel purchase experience.

**THANK YOU TO OUR MEMBERS !**

We would like to take this opportunity to thank all our full and associate members for your support this year. Your contributions have made a huge impact on the work of the Federation and benefitted the entire sector.

**ASSOCIATE MEMBERSHIP PROGRAMME**


**VISIBILITY**

**INSIGHT**

**BUSINESS DEVELOPMENT**

**PROMOTION**

**COMMUNITY**

**CONTRIBUTION**

To find out about the benefits of becoming an associate member of Eurofinas, please contact s.ezerins@eurofinas.org eurofinas

SPECIALISED CONSUMER CREDIT PROVIDERS IN EUROPE

Eurofinas AISBL
Boulevard Louis Schmidt, 87
B-1040 Brussels

**www.eurofinas.org**

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