Digital Policy Alert

How Governments Address AI Consumer Protection

Tommaso Giardini and Nils Deeg

November 2026

An initiative of the
St.Gallen Endowment
for Prosperity through Trade

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AI capabilities are advancing at a pace that is hard to follow for experts, let alone everyday consumers. At the same time, governments are reining in AI firms that exaggerate the capabilities of their AI systems: The US Federal Trade Commission prohibited DoNotPay from claiming that its "AI lawyer" service performs like a real lawyer without evidence, while the Italian consumer authority secured commitments from DeepSeek, Mistral, and Nova to warn users about hallucinations.

As AI enters more realms of our professional and personal life, protecting consumers is a concern shared across borders. Governments worry that AI can deceive users, manipulate their behaviour, and lead to addiction. They thus regulate AI firms' and AI systems' behaviours, while establishing safeguards to protect vulnerable groups, such as minors.

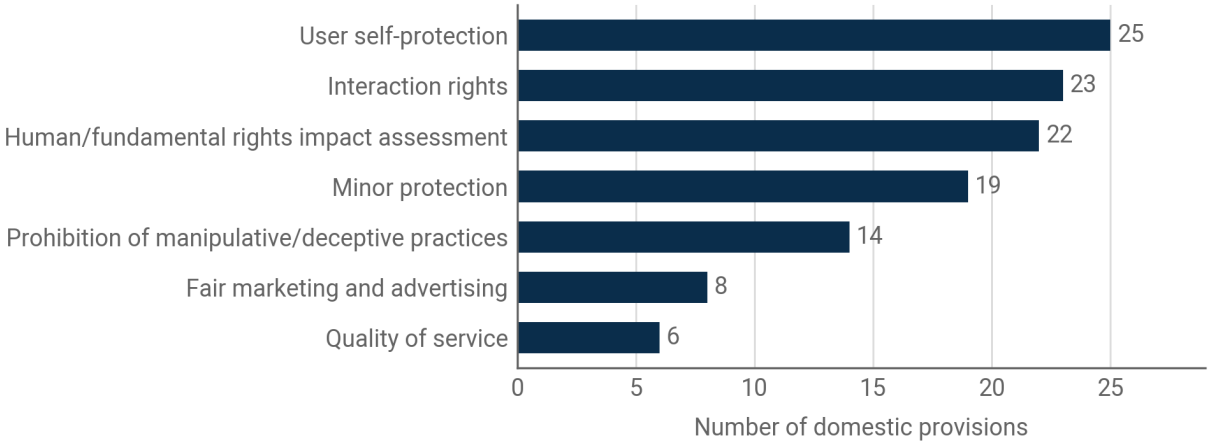
Domestic Regulation

Consumer protection is a common concern in AI regulation: The DPA has documented 242 domestic policy and enforcement developments on consumer protection in AI since January 2020. The DPA's systematic taxonomy reveals the following trends in AI consumer protection regulation:

- The US is the most active jurisdiction, with 65 state-level and 49 federal developments, followed by the EU (19), China (18) and the UK (12).
- The current status of developments is spread: 84 developments are in force or adopted, 124 are currently under deliberation and 34 are concluded, rejected, revoked or under investigation.
- Most consumer protection rules are found in binding laws (127) or binding orders (24), compared to 33 non-binding guidelines. Enforcement is frequent, with 58 enforcement cases and inquiries, the third-highest count of any concern.

Recent developments include the entry into force of China's interim measures on anthropomorphic AI interaction services, requiring providers to warn users who become reliant on the service and remind them after two hours of continuous use, an assessment by Brazil's Ministry of Justice (digital rights secretariat) of 13 AI companion services against the Consumer Protection Code and the children's digital statute, and the introduction of an Irish Bill barring AI companion services from misleading users into believing the system is human.

Our text-level analysis of 84 rulebooks across 19 jurisdictions reveals how governments address consumer protection in AI in detail. We find that governments use seven different regulatory requirements to pursue consumer protection, which appear a total of 117 times. The requirements span: safeguards to protect users against addiction, emotional dependency and self-harm (25 provisions, "user self-protection"), rights for users to opt out of AI, file complaints or request human review (23, "interaction rights"), human or fundamental rights impact assessments (22), minor protection through usage restrictions and parental controls (19), prohibitions of manipulative or deceptive practices such as subliminal techniques (14), fair marketing and advertising rules with regard to the capacities of AI systems (8), and quality of service rules ensuring stable and continuous service (6).



International Coordination

Our text-level analysis of nine international AI frameworks shows that seven cover consumer protection across 11 provisions, all except the G7 Principles and the ASEAN Expanded Guide on Generative AI.

International frameworks address only some consumer protection requirements. The most commonly mentioned requirement is human/fundamental rights impact assessment (4), followed by minor protection (3). The prohibition of manipulative or deceptive practices (2) and interaction rights (2) appear only in the UNESCO Recommendation and the ASEAN Guide. User self-protection (1) appears only in the UNESCO Recommendation. Fair marketing and advertising and quality of service are not mentioned in any framework.

Framework	Human/ fundamental rights impact assessment	Minor protection	Prohibition of manipulative/ deceptive practices	Interaction rights	User self-protection
ASEAN Expanded Guide (Generative AI)	–	–	–	–	–
ASEAN Guide	–	–	■	■	–
Council of Europe Framework Convention	■	■	–	–	–
G7 Hiroshima Code of Conduct	–	■	–	–	–
G7 Hiroshima Guiding Principles	–	–	–	–	–
Joint Declaration	■	–	–	–	–
OECD AI Principles	–	–	–	–	–
UNESCO Recommendation	■	■	■	■	■
UNGA Resolution	■	–	–	–	–

There are differences in how international AI frameworks focus on consumer protection and how actionable their language is. Of the 11 provisions, six focus on consumer protection as the core

concern, while five only touch upon it tangentially.Ten provisions across all seven frameworks provide actionable language.

Alignment Between Domestic and International Action

Consumer protection features far more heavily in domestic rulebooks than in international frameworks. None of its requirements reaches more than four of the nine international frameworks. User self-protection and interaction rights, the two most common domestic requirements, show the sharpest contrast, appearing in only one and two international frameworks. Human rights impact assessments travel furthest, with four international frameworks covering them. Fair marketing and advertising and quality of service have no international counterpart at all. Finally, where international frameworks address consumer protection, their language is largely concrete. Nearly all provisions are actionable, and about half focus mainly on consumer protection.

To understand how governments tackle AI consumer protection in depth, readers can explore our AI Governance Hub's consumer protection page. It shows the relevant DPA entries and the full-text provisions of domestic AI regulations and international AI frameworks, structured using our taxonomy. The page draws data from the DPA's Activity Tracker, which provides daily updates on digital policy and provides tailored notifications, as well as our full-text analysis tool Clairk.

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Contact
Written by Tommaso Giardini and Nils Deeg
Please send questions and suggestions to nils.deeg@sgept.org

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