

NON-IMPERATIVE FORMS OF ACTION BY THE PRESIDENT OF THE OFFICE OF COMPETITION AND CONSUMER PROTECTION IN THE FIELD OF NON-FOOD PRODUCT SAFETY: A CONSUMER PROTECTION PERSPECTIVE

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Abstract. This article aims to present the information activities of the President of the Office of Competition and Consumer Protection in the context of product safety, focusing on the legal forms of action employed by public administration in the protection of consumer interests. It argues that reliable information about products and efficient communication between relevant administrative bodies, entrepreneurs and consumers is essential for effective consumer protection in the digital age and era of online transactions. This is achieved through non-imperative forms of action by the President of OCCP, with information activities (acts of information) being of particular significance.

Keywords: forms of public administration action; information activity; President of the OCCP; consumer protection.

INTRODUCTION

The onset of the 21st century saw a number of socio-economic changes, coupled with the dynamic development of new technologies and digitisation. These developments have resulted in a significant increase in the number of state tasks in the economy, thus posing a number of challenges to the legislator in terms of how these tasks should be implemented by the public administration in order to effectively apply and enforce compliance with the law. In instances where interaction with external actors is required (such as entrepreneurs and consumers), there has been a notable shift towards the utilisation of non-imperative forms of action by public administrations. This phenomenon is becoming increasingly evident in the field of product safety, where various forms of information-based legal action by public administrations are gaining importance. The diversity of products and the various delivery channels (both online and offline) necessitate a constant and rapid flow of information regarding the characteristics of products entering the market. Consequently, product information activities (information acts) are crucial

for the effective functioning of the normative system of product safety. In this regard, the President of the Office of Competition and Consumer Protection (OCCP) assumes a pivotal role, serving as the principal economic administration entity tasked with ensuring product safety and consumer protection.

The article demonstrates that the availability of reliable information about products and the capacity for rapid communication between the relevant administrative bodies, entrepreneurs and consumers is a prerequisite for the effective protection of consumers in the context of digitalisation and the prevalence of online transactions. This is supported by the non-imperative forms of activity of the President of the OCCP, of which information activity (acts of information) is a particularly prominent example.

1. INFORMATION ACTIVITY AS A NON-IMPERATIVE FORM OF PUBLIC ADMINISTRATION ACTIVITY

For many years, the legal forms of action of public administration, in conjunction with forms of organising activities, have been the focus of interest among scholars of administrative law. This issue is the subject of numerous scientific studies, and the literature contains various conceptualisations of legal forms of action and catalogues of different types [Błaś 1998, 282; Idem 2004, 320-22; Ura 2010, 107; Zimmermann 2012, 289; Suwaj 2009, 309; Ziemski 2012, 4]. However, there is no shortage of discrepancies and controversies on how to understand these concepts, as evidenced by the work of Kijowski [Kijowski 2016, 217-25]. For the sake of brevity, these will not be considered further here.

The concept of a “legal form of public administration activity” is not straightforward to grasp, given the multiplicity of definitions that exist in the views of legal academics and commentators. It is therefore worth emphasising that one of the first authors to define the essence of legal forms of administration action was Jerzy Starościak. In his analysis, Starościak posits that legal forms of administrative action represent the legally regulated instruments through which the administration can act [Starościak 1978, 39-40]. Nevertheless, it is necessary to concur with Małgorzata Stahl’s assertion that traditional catalogues of legal forms of action cannot be regarded as definitive and immutable in the context of an evolving administrative environment, an expansion of its responsibilities and a diversification of its structures, as well as the emergence of new forms of action and functions [Stahl 2013, 401].

In the field of administrative law, there is currently a diversity of approaches to defining the legal forms of action of public administration. For the purposes of this study, we adopt the following definition: a legal form of action of administration is a legally defined type of action of an administrative body. This encompasses a range of forms (types)

of administrative activities stipulated in the law, as outlined by Wierzbowski and Wiktorowska [Wierzbowski and Wiktorowska 2015, 247]. In other words, these are the forms of legal actions of the public administration (authoritative or non-imperative), through which the bodies create certain administrative-legal relations and fulfil the public functions and tasks assigned to them. Such categorisations are typically adopted in academic textbooks.

Despite the extensive analysis of the issue of legal forms of administrative activity from various perspectives, the subject retains its significance and timeliness due to the ongoing transformation of social and economic relations, where public administration performs particular public tasks. As Irena Lipowicz observes, “The legal forms of action of the administration evolve in conjunction with the tasks for which they were created. This is because, as Teresa Rabska maintains, the legal forms of action of administration serve to facilitate the fulfilment of the tasks of public administration” [Lipowicz 2016, 41]. In light of the aforementioned considerations, it is evident that in the present circumstances, these non-imperative forms of action, which have hitherto been subjected to relatively limited scrutiny within the theoretical discourse, are assuming greater significance. This is particularly evident in those domains where the efficacy of the implementation of a public task hinges upon the close collaboration of the entities in question. This interdependence is particularly evident in the context of product safety assurance.

Non-imperative forms of administrative action typically include the following: administrative settlements, administrative agreements, administrative promises as well as social and organisational and informational actions [Cieślak 2012, 91-130]. This study will focus on the last of these. The literature indicates that social and organisational actions are a non-imperative form of administrative action similar in their nature to the measures used by civil society organisations. They belong to the scope of *de facto* activities and may constitute both an independent form of implementation of public activities and a subsidiary form, supplementing other forms of activities, including imperative forms of action [Boć 2010, 318-54].

Information activity has also received various definitions in the views of legal academics and commentators. A broad definition of an act of information was proposed by Małgorzata Stahl, whereby it should be understood as “any document from which a citizen derives knowledge about the activities of public administration, i.e. a document related to official information activity” [Stahl 2013]. On the other hand, Wojciech Taras formulated a definition of an information activity that it is “information provided to citizens by the administration (i.e.) a statement of knowledge by a hub or functionary of a public administration body or other administrative entity, concerning a specific factual state, legal state or legal consequences resulting therefrom. It does not directly produce any legal consequences,

but may affect the realisation of certain rights or obligations of the recipient of the information or of third parties” [Taras 1988, 67]. This understanding of information activity is adopted in this study for the purpose of analysing the actions of the OCCP president. Generally speaking, information activity covers broad factual activities of administrative bodies, which consist, *inter alia*, in the promotion of legal knowledge among administered entities, including about ongoing changes in the law, as well as about the activities of administrative establishments and also about the performed public tasks within the jurisdiction of administrative bodies and the activities of persons performing public functions, and may be conducted through multiple access channels and in various ways.

In recent years, there has been a notable increase in the academic interest in the field of information activity from the perspective of legal forms of administrative action. This is particularly evident in the context of public administrative tasks that undergo Europeanisation. Elżbieta Małecka correctly identifies that the Europeanisation of Polish public law has resulted in a replacement of administrative law norms by civil law norms. In this manner, non-imperative forms of action by administrative bodies, which do not necessitate the utilisation of repressive administrative coercive measures, become a legal fact [Małecka 2016]. However, it is important to note that these actions also implement of the constitutional right of citizens to information, as expressed in Article 61 of the Polish Constitution. The right to information, in its broadest sense, encompasses not only the right to public information as defined in Article 1 of the Access to Public Information Act,¹ but also information on the activities of the state administrative apparatus in a general sense, in relation to the implementation of public tasks [Kudrycka 1995, 93; Taras 1992, 14]. It is evident that the advent of new technologies, climate change and the introduction of novel products to the market give rise to a host of hitherto unforeseen threats to human health and life, as well as to the natural environment. The potential for these threats to be averted or at least mitigated is contingent upon the dissemination of information regarding these concerns to the public. In light of the aforementioned considerations, the dissemination of information (in terms of both the velocity of its dissemination and, more crucially, its efficacy) has emerged as a pivotal avenue of action for the administrative apparatus. This is particularly true given the imperative of safeguarding citizens against the myriad threats that characterise the modern era. While information activity may be regarded as a secondary concern relative to other forms of activity, its prudent execution can significantly enhance the swiftness and efficacy with which administrative processes are conducted.

¹ Act of 6 September 2001 on access to public information, Journal of Laws of 2022, item 902.

2. THE ASSUMPTIONS AT THE CORE OF THE NON-FOOD PRODUCT SAFETY SYSTEM AND CONSUMER PROTECTION IN THE CONTEXT OF INFORMATION ACTIVITY

The non-food product safety system is the result of the Europeanisation of administrative law within the framework of complex European integration (the EU internal market). In essence, the freedom of movement of goods and the development of entrepreneurship have led to the pursuit of a high level of protection of consumer interests, which has become an integral part of EU consumer policy [Cieśliński 2013, 273-80]. The European heritage of this normative domain and the public functions fulfilled within it consequently shape the legal instruments employed by the administration.

In order to provide a brief overview of the assumptions of this system, it is important to emphasise that product safety is regulated at two levels: horizontal and vertical. The horizontal level is general and applies to products that are not covered by harmonisation, whereas the vertical level is sectoral and applies to products that are covered by harmonised legislation. At both levels, only products that are safe for consumers are permitted to be placed on the EU internal market. From a horizontal perspective, there is an absolute (general) obligation for all products placed on the EU market to meet an adequate level of safety. From a vertical perspective, there are additional harmonised technical requirements for specific product groups (within sectors) set out in sectoral regulations.

Concurrently, the intention of these requirements is to guarantee uniform (high) product quality throughout the EU internal market, which in turn is designed to ensure a high level of product safety and, as a result, protect consumers [Żywicka 2023, 127-42]. From a technical, legal and structural perspective, the EU non-food product safety system comprises the following elements: technical and legal measures, legal institutions, administrative structures for supervision as well as organisational and technical tools. The technical measures include essential or other product requirements, standards and technical specifications. The legal measures comprise legal rules and standards for the competence of conformity assessment bodies, accreditation granting principles, conformity assessment procedures, as well as modules and rules for CE marking. The legal institutions pertain to market surveillance, including the control of products from third countries. The administrative structures for supervision (supervisory bodies)² and organisational and technical tools (hazard communication systems)³

² For more on the assumptions of the conformity assessment system, see: EU Commission Notice Blue Guide – Implementation of EU product legislation 2022, (2022/C 247/01), OJ C 247/1, 29 June 2022.

³ In EU legislation, the basic assumptions, objectives, institutions and legal means of such a

are also of significance, as they determine the complex public tasks in this area carried out by public administrations (both EU and national) organised in a network structure.

It can be concluded that the objective of the system described above is consumer protection. It is achieved by ensuring that products are safe and of proven quality, and by ensuring access to information about products placed on the market. This includes, in particular, dangerous products and products that do not meet essential requirements. In this manner, consumer protection is established, which, in accordance with Article 169(1) of the Treaty on the Functioning of the European Union, constitutes one of the EU's internal policies and activities.

Furthermore, it is important to note that the case law of the Court of Justice of the EU has developed a model of the average consumer for the purpose of protecting consumer interests. This model describes a consumer who is duly informed, attentive, and rational. Such a consumer has a certain amount of information, is able to use it, verifies marketing messages, is able to find the information necessary to make purchase decisions, and is attentive when making purchases and critical towards marketing messages addressed to them [Daniel and Geburczyk 2019]. In light of this perspective, it can be posited that the principal objective of the solutions under discussion is to safeguard the interests of consumers and to establish a foundation upon which consumers can make well-informed decisions regarding the products they purchase. It is also worth noting that the role of information in achieving this objective is highlighted in the views of legal academics and commentators when addressing the issue of food safety. They assert that consumers should be provided with comprehensive information regarding existing risks, and that risk assessors should be granted access to all data and information obtained throughout the risk management process, in order to make an accurate assessment based on this data

system are regulated by: Regulation (EC) 2023/988 of the European Parliament and of the Council on general product safety, amending Regulation (EU) No. 1025/2012 of the European Parliament and of the Council and Directive (EU) 2020/1828 of the European Parliament and of the Council and repealing Directive 2001/95/EC of the European Parliament and of the Council and Council Directive 87/357/EEC; Regulation (EC) No. 765/2008 of the European Parliament and of the Council of 9 July 2008 setting out the requirements for accreditation and repealing Regulation (EEC) No. 339/93 (Official Journal of the EU L 218/30 of 13 August 2008, consolidated version of the act of 16 July 2021), Regulation (EU) 2019/515 of the European Parliament and of the Council of 19 March 2019 on the mutual recognition of goods lawfully marketed in another Member State and repealing Regulation (EC) No. 764/2008 (Official Journal of the EU L/91 of 23 March 2019). Market surveillance rules are governed by Regulation 2019/1020 EU of 20 June 2019 on market surveillance and product conformity and amending Directive 2004/42/EC and Regulations (EC) No. 765/2008 and (EU) No 305/2011 (OJ EU L 169/1 of 25 June 2019).

and scientific knowledge. Furthermore, the protection of consumer health and safety necessitates the provision of comprehensive information to risk managers and traders [ibid.].

It is also important to highlight that consumer protection through information is a preventative measure, designed to avert misguided purchasing decisions across all sectors, not merely in the domain of product safety. This approach safeguards consumers from potential hazards and risks. However, this condition can only be fulfilled if there is a rapid dissemination of information about products, particularly in the context of products offered via online purchasing platforms.

3. TASKS OF THE PRESIDENT OF THE OCCP IN THE AREA OF PRODUCT SAFETY – AN OVERVIEW

As public tasks in the area of competition, consumer protection and product safety undergo the process of Europeanisation, the way in which they are carried out is also affected. Pursuant to the principle of loyal cooperation, which is a general principle of EU law, Member States are obliged to designate national authorities competent to implement EU law and to cooperate with EU institutions and administrations of other Member States in the aforementioned areas [Hauser, Niewiadomski, and Wróbel 2014]. In Poland, the Office of Competition and Consumer Protection is the competent authority for the tasks outlined above. Its responsibilities are set out in the Act of 16 February 2007 on competition and consumer protection,⁴ as well as the Act of 13 April 2016 on conformity assessment and market surveillance systems.⁵ Additionally, the Office oversees horizontal (general) product safety matters under the Act of 12 December 2003 on general product safety.⁶

In order to analyse the tasks of the President of the OCCP in relation to product safety, it is necessary to consider the issue in accordance with the regulations adopted in the system. This analysis should be conducted at two levels: horizontally (in a general sense) and sectorally (in relation to specific product safety issues). In the initial area, the provisions of Regulation (EU) 2023/988 of the European Parliament and of the Council of 10 May 2023 on general product safety shall apply. It amends Regulation (EU) No. 1025/2012 of the European Parliament and of the Council and Directive (EU) 2020/1828 of the European Parliament and of the Council, and repeals Directive 2001/95/EC of the European Parliament and of the Council

⁴ Journal of Laws of 2024, item 594.

⁵ Journal of Laws of 2022, item 1854.

⁶ Journal of Laws of 2021, item 222.

and Council Directive 87/357/EEC. It will come into force on 13 December 2024. This act has harmonised product safety issues across the EU and will be directly applicable. However, issues related to the tasks carried out by national authorities will only be enacted by law. At the time of writing, the legislative process is still ongoing. In the context of the extant legal framework, Article 14 of the current Act stipulates that the President of the OCCP exercises supervision over general product safety, which encompasses the following: 1) the periodic monitoring and evaluation of the effectiveness of the control of compliance of products with the general safety requirements, taking into account the types of products controlled and the risks investigated; 2) the development of periodic plans for the control of products with regard to compliance with the general safety requirements and monitoring of their implementation; 3) the conducting of proceedings on general product safety; 4) the maintenance of a register of hazardous products and the collation of data on products that do not comply with the specific safety requirements; 5) the collection of information on product safety, its transmission to the relevant authorities and the monitoring of its utilisation; 6) the collation of notifications on hazardous products submitted by producers and distributors. It is anticipated that these tasks will remain pertinent following the implementation of the aforementioned regulation. The tasks presented, from the perspective of legal forms of action, are mainly carried out in authoritative forms, such as administrative decisions issued in the course of product safety proceedings, and are essential for enforcing obligations on administered entities (entrepreneurs) with regard to compliance of products with general safety requirements. Non-imperative forms (product register, collection of information on hazardous products) are also no less important and will be discussed further in this paper.

In examining the competencies of the President of the OCCP in the domain of sectoral product safety, it becomes evident that the primary objective is to oversee the conformity of products with the standards set forth by EU harmonised legislation. The President of the Office is responsible for ensuring that products bearing the CE marking comply with the relevant EU legislation. It is important to note that this supervisory function is organised within a network administrative structure, which is composed of specialised administrative bodies. The President of the OCCP serves as the monitoring and coordinating authority for the system. Their duties include: 1) cooperation with other national market surveillance authorities, market surveillance authorities of EU Member States and Member States of the European Free Trade Agreement (EFTA) – parties to the Agreement on the European Economic Area, as well as with customs authorities; 2) participation in the work of the bodies of the Council of the EU and the European Commission, EU administrative cooperation

groups and in international forums in the field of the market surveillance system; 3) disseminating to other national market surveillance authorities, the European Commission and the market surveillance authorities of the EU Member States and the Member States of the European Free Trade Agreement (EFTA) – parties to the Agreement on the European Economic Area, as well as to customs authorities – information indicating that a product placed on the market does not fulfil the requirements or poses a risk, or formal non-compliance has been found, along with the corresponding actions taken; 4) communicating to the European Commission information on the relevant national market surveillance authorities and their respective competencies; 5) preparing and updating regular plans and reports on the performance of the national market surveillance system and publicly disseminating them, as well as transmitting them to the European Commission, EU Member States, and Member States of the European Free Trade Agreement (EFTA) – parties to the Agreement on the European Economic Area; 6) maintaining a register of non-compliant or hazardous products. In pursuance of the amendment of the legislation in 2021,⁷ the President of the OCCP has been designated as the single liaison office within the market surveillance system, as defined in Regulation (EU) 2019/10 of the European Parliament and of the Council.⁸ Consequently, the President of OCCP bears the responsibility for representing the unified stance of national market surveillance authorities and authorities tasked with the regulation of products placed on the European Union market, as well as for communicating the national market surveillance strategy. Furthermore, the President of the OCCP is required to facilitate intra-EU cooperation (including the exchange of information and the legal obligation to provide mutual assistance in ongoing proceedings) between market surveillance authorities of Member States with regard to mutual cross-border assistance. The aforementioned tasks are carried out in the form of non-imperative activities, both on the internal and external level. The first includes activities directed towards other administrative bodies, including national, EU, and other Member States, whereas the latter pertains to activities directed towards entities under administration, outside the administrative structures.

A comparison of the President of the OCCP's two areas of competence in the field of product safety reveals that the tasks related to general product safety are primarily conducted in accordance with the imperative formula.

⁷ Act of 15 April 2021 on amendments to the Act on the conformity assessment and market surveillance system, Journal of Laws item 925.

⁸ Regulation (EU) 2019/1020 of the European Parliament and of the Council of 20 June 2019 on market surveillance and product conformity and amending Directive 2004/42/EC and Regulations (EC) No. 765/2008 and (EU) No. 305/2011 (OJ L 169, 25.06.2019, p. 1).

When conducting proceedings in the area of general product safety, the authority issues administrative decrees, which unilaterally shape and impose administrative sanctions upon the entities under its administration. In contrast, the area of sectoral safety is primarily defined by tasks that are not imperative in nature.

4. THE INFORMATION ACTIVITY OF THE PRESIDENT OF OCCP IN RESPECT OF PRODUCT SAFETY

In terms of information activities, it is first necessary to consider the public registers maintained by the President of the Office of Competition and Consumer Protection (OCCP). These comprise two distinct lists: the register of hazardous products and the register of non-compliant products or products which may present a risk. The registers are maintained in both paper and electronic format, and their contents are published on the website of the Office of Competition and Consumer Protection. The registers contain entries that imply the authoritative action of the President of OCCP and other authorities with competence in product supervision. An entry is made on the basis of a final administrative decision issued by the President of the OCCP in the course of the relevant proceedings. The entries are a typical instance of information acts as non-imperative administrative activities. The registers serve as an official information tool for consumers, with the objective of disseminating knowledge about products that have been withdrawn from the market.

In accordance with Article 61 of the Act on Conformity Assessment and Market Surveillance Systems, the President of the OCCP maintains a register of non-compliant products or products which may present a risk. The register collates data that enables the identification of the product in question, as well as information pertaining to: a) the specific nature and extent of the product's non-compliance with the requisite standards, the potential risks it may present, and the formal non-compliances identified; b) the measures that have been taken with respect to the product. In accordance with Article 30 of the General Product Safety Act, the register of hazardous products is required to collate information on products that fail to comply with the general safety requirements. In particular, the following information must be included: 1) data enabling the product to be identified; 2) information on: a) the nature and extent of the risks posed by the product, b) the measures that have been applied to the product. The entry in the register shall be deleted when the person concerned provides proof that the product has been withdrawn from the market or when the non-compliance with the safety requirements has been rectified. In order to ascertain whether products that do not comply with safety requirements

have been withdrawn from the market or whether non-compliance with safety requirements has been rectified, the supervisory authority may request the provincial inspector of the Trade Inspection to conduct an inspection in accordance with the relevant safety requirements.

It is also pertinent to note that, as part of the information dissemination process, the President of the OCCP publishes on the Office's website notices concerning hazardous products. These notices contain information on the hazards published by manufacturers, distributors or importers in connection with proceedings conducted by the OCCP. Furthermore, the dissemination of information on product safety may encompass educational initiatives spearheaded by the President of the OCCP, in accordance with the Act on Competition and Consumer Protection.

Effective consumer protection against the sale of unsafe or non-compliant products is contingent upon the timely dissemination of information to consumers concerning the potential hazards associated with the products in question. As previously stated, this protection is carried out in accordance with the information activities conducted by the President of the OCCP, with the objective of preventing potential issues. The particular character of the information activities renders them non-compulsory. It is not within the authority's purview to compel the consumer to read the information. Consequently, the efficacy of the message is compromised by the selection of information channels, which fail to reach the intended audience on a broad scale.

The results of the audit conducted by the Supreme Audit Office in 2019 revealed a notable deficiency in consumer awareness regarding the CE marking system for products. Notwithstanding the fact that some of the administrative bodies responsible for market surveillance conducted an extensive information campaign on their websites, the level of awareness regarding the CE mark was found to be negligible. In the case of 85% of those surveyed, the question of whether the products they intended to purchase were CE marked was of no consequence. Only one in ten respondents demonstrated an ability to correctly identify the mark of conformity with EU standards (9.7%).⁹ Although the issue of the means through which information must be conveyed lies outside the scope of regulation, this poor result nevertheless represents a cause for concern, even five years after the study. This may indicate the low effectiveness of the current information activity and the necessity to promote information in informal online formats that will reach and engage the modern consumer. In light of the ongoing

⁹ Supreme Audit Office Report of 2019 on the Safety of CE-marked product, <https://www.nik.gov.pl/plik/id,21619,vp,24268.pdf> [accessed: 20.08.2024] and data available on the Supreme Audit Office website <https://www.nik.gov.pl/aktualnosci/bezpieczenstwo-pod-znakiem-ce.html> [accessed: 20.08.2024].

digitalisation and the growing accessibility of the Internet, it is imperative to implement information campaigns in the mass media and on the Internet that are compelling, relevant, and tailored to the interests of the target audience. The advancement of digital technologies and the rising digital competencies of society should be leveraged to this end.

CONCLUSION

The findings of this study support the hypothesis that the information activity of the President of the OCCP in the field of product safety represents a significant aspect of its operations from the standpoint of safeguarding consumer interests. Furthermore, it represents an intriguing avenue for inquiry with regard to the legal forms of public administration activity.

In the context of public tasks subjected to the process of Europeanisation, and implemented within networked administrative structures, the efficiency and effectiveness of any given action is contingent upon the utilisation of information and communications technology. This holds true not only within the internal operations of a given administration, but also extends to its external activities in regard to the entities under its administration. The aforementioned relationship is exemplified in the context of product safety, as illustrated in this paper. It is not the case that non-imperative forms of action can be considered a substitute for authoritative action. However, their subsidiary importance is increasingly recognised in an era of continuous development of new technologies and the information society. This is evident in both internal communication between administrations and external communication towards businesses and consumers. In these contexts, non-imperative forms of action support traditional forms of action. Furthermore, the evolving role of public administration is a contributing factor. The function of providing support for sustainable economic development while ensuring consumer and environmental protection is becoming increasingly significant.

Although information activities on products (product registers) do not directly produce legal effects, they are an inseparable part of the process of administration in the area of product safety. They constitute an effect of authoritative actions and have a legal basis, as they are a form of action of the President of the Office of Competition and Consumer Protection. Information activities in the field of product safety play a pivotal role in preventing potential hazards, as informed consumers are better equipped to make decisions that align with their preferences and wellbeing. It can therefore be concluded that the dissemination of effective information can protect the health and lives of consumers. It thus falls upon public administration to address the challenge of how to conduct effective communication across various mass media on an ongoing basis.

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