



EU Regulations: Right of Withdrawal

Withdrawal Button for Magento 2

This page explains the legal background behind the [Withdrawal Button](#) for Magento 2. EU Directive 2023/2673 requires all online sellers serving EU consumers to provide a digital withdrawal function starting June 19, 2026. This guide covers what the law requires, which products are exempt, how the withdrawal period works, and what happens if you don't comply. This is a practical summary for webshop owners — not legal advice.

The Directive in Brief

Directive (EU) 2023/2673 amends the Consumer Rights Directive (2011/83/EU) by adding Article 11a. The core requirement:

Withdrawing from a distance contract must be as easy as concluding one.

If a customer can place an order with a few clicks, they must be able to withdraw from it with a few clicks too. The directive requires a clearly visible, easily accessible digital withdrawal function on your online interface.

Key Dates

Date	What happened
December 6, 2023	Directive (EU) 2023/2673 published
December 19, 2025	Deadline for EU member states to transpose into national law
June 19, 2026	Rules apply — compliance mandatory for all online sellers

What the Law Requires

The Withdrawal Function Must:

- Be **clearly visible and intuitive** — no hiding it in submenus or making it hard to find
- Use an **unambiguous label** clearly indicating that the customer can withdraw (e.g. "Withdraw from this order")
- Be **accessible without login** — you cannot require account creation to withdraw
- Remain **available throughout the entire withdrawal period**
- Include a **confirmation step** (e.g. "Confirm withdrawal")
- **Not use dark patterns** — no discouraging messaging, confusing layouts, or unnecessary steps
- Be **no more burdensome** than the ordering process itself

After a Withdrawal, the Trader Must:

- Send an **immediate confirmation** on a durable medium (email) including the withdrawal details, date, and time
- Process the **refund within 14 days** of receiving the withdrawal
- Maintain **records** of all withdrawals for audit purposes

Important: The Button Does Not Replace Other Methods

The withdrawal function is an *additional* requirement. You must still accept withdrawals via the statutory model withdrawal form and other reasonable means (email, letter). The button makes it easier — it doesn't replace existing obligations.

Withdrawal Period

Consumers have **14 calendar days** to withdraw from a distance contract without giving any reason.

When the period starts depends on the type of contract:

Contract type	Period starts from
Goods	The day the consumer (or a third party) receives the goods
Multiple goods in one order	The day the last item is received
Regular delivery (subscription)	The day the first delivery is received
Services	The day the contract is concluded
Digital content (not on physical medium)	The day the contract is concluded

If the trader has not properly informed the consumer about the right of withdrawal, the period is extended by up to **12 months**.

Products and Services Exempt from Withdrawal

Article 16 of the Consumer Rights Directive lists specific exceptions where the right of withdrawal does **not** apply:

Goods

- **Custom or personalized goods** — made to the consumer's specifications

- **Perishable goods** — liable to deteriorate or expire rapidly
- **Sealed hygiene goods** — not suitable for return due to health/hygiene reasons and unsealed after delivery
- **Sealed audio, video, or software** — unsealed after delivery
- **Goods inseparably mixed** with other items after delivery
- **Newspapers, periodicals, magazines** — individual issues (subscriptions are not exempt)

Services

- **Fully performed services** — if the consumer gave prior express consent and acknowledged they would lose the withdrawal right
- **Price-dependent on financial market fluctuations** — that cannot be controlled by the trader
- **Accommodation, transport, car rental, catering, leisure** — if the contract specifies a date or period
- **Urgent repairs or maintenance** — specifically requested by the consumer

Digital Content

- **Digital content not on a tangible medium** — if performance has begun with the consumer's express consent and acknowledgment that the withdrawal right is lost

What This Means for Your Magento Store

The module lets you configure exclusions to match these legal exceptions:

- **Excluded Product Types:** Use for virtual and downloadable products (digital content delivered immediately)
- **Excluded Categories:** Use for categories containing exclusively exempt products (personalized goods, sealed hygiene products, perishables)
- **Excluded SKUs:** Use for individual products that fall under an exemption

An order is only blocked from withdrawal if **all** items are excluded. Mixed orders (exempt + non-exempt items) remain eligible.

Penalties for Non-Compliance

Penalties vary by member state but the directive requires them to be "effective, proportionate and dissuasive":

- **Administrative fines** — up to EUR 900,000 per infringement or a percentage of annual turnover (varies by country)
- **Extended withdrawal period** — failure to properly inform consumers about withdrawal rights extends the period by up to 12 months

- **Unfair commercial practices** — non-compliance may be classified as an unfair practice under consumer protection law
- **Civil liability** — withdrawal requests may be deemed valid regardless of how they were submitted

Country-Specific Notes

Each EU member state transposes the directive into national law, which may add local requirements:

Country	National implementation
Germany	Section 356a BGB — also extends to insurance contracts
Netherlands	Expected via amendment to Book 6 of the Dutch Civil Code
France	Transposed via consumer code amendments

Check your local implementation for any additional requirements beyond the EU minimum.

How the Module Maps to Legal Requirements

Legal requirement	Module feature
Clearly visible withdrawal function	Withdraw button on order detail, My Orders, footer link
Accessible without login	Magic link in order email, guest lookup page
Confirmation step	2-step flow (form → confirm)
Immediate confirmation on durable medium	Automated confirmation email with reference code and timestamp
Available throughout withdrawal period	Eligibility checker enforces configured period
No dark patterns	Plain, straightforward UI without discouraging messaging
Record keeping	All withdrawals stored in <code>mm_withdrawal</code> table with full audit trail

Disclaimer

This page provides a practical summary of EU Directive 2023/2673 and related consumer protection regulations for informational purposes. It is not legal advice. Consult a qualified legal professional for advice specific to your situation and jurisdiction.

Further Reading

- [Directive \(EU\) 2023/2673 — Full text \(EUR-Lex\)](#)
- [Consumer Rights Directive 2011/83/EU — Summary \(EUR-Lex\)](#)
- [Article 16 — Exceptions from the right of withdrawal \(Lexparency\)](#)

Need More Help?

Documentation:

- [All Help Articles](#) - Complete documentation overview

Support:

- [Contact Support](#) - Get help from our team

For a complete overview of features and configuration options, see the Withdrawal Button extension on magmodules.eu

All articles for Withdrawal Button

Installation

1	Installation using Composer (recommended)
2	Installation using the Adobe Marketplace
3	Install through FTP and SSH

Configuration

1	Configuration Guide
2	Quick Start Guide

Troubleshooting

1	Troubleshooting
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Background

1	Best Practices
2	EU Regulations: Right of Withdrawal (current)

