

# POSITION ON THE SINGLE MARKET STRATEGY

# **Eurochambres position on the Single Market Strategy**

Eurochambres supports the latest Single Market Strategy's goal of deepening integration in the EU, addressing long-lasting barriers, and boosting competitiveness, while stressing that actions must be realistic, practical, and legally sound to deliver real value for Europe's business community.

# 1. Executive summary

As one of the EU's most important achievements and a foundation for its economic strength, the single market is increasingly under pressure, with concerns emerging about its ability to remain both competitive and dynamic. Evidence from the recent <u>Annual Single Market and Competitiveness Report</u> shows that trade in goods and services relative to GDP has plateaued, indicating a slowdown in cross-border integration and economic growth.

We therefore welcome the European Commission's Single Market Strategy of 21 May 2025 as a necessary set of actions addressing fragmentation and weak enforcement. The focus on dismantling the "Terrible Ten" barriers, the reference to upcoming simplification packages and the plans for more digitalisation all respond to concrete challenges. Actions to harmonise packaging as well as environmental standards and to improve the recognition of professional qualifications as well as reduce regulatory burdens are also commendable.

However, structural impact requires embedding short-term measures within a long-term strategic vision, with clear milestones, performance metrics and a path towards deeper integration. This reflects the broader call by the Council to pursue more coherent, forward-looking strategies that contribute to lasting progress. The Single Market Roadmap to 2028, recently announced by President Ursula von der Leyen, could provide a solid foundation for such a vision, offering a clear framework to align immediate actions with long-term objectives and reduce the risk of policy fragmentation.

Furthermore, the single market should not be considered in isolation. Eurochambres points out that the potential of the Savings and Investment Union was largely overlooked in this strategy, even though it plays a key role in improving businesses' access to finance. The single market is also underpinned by the free movement of capital, which is essential for closing the financing gap experienced by SMEs and for mobilising the reinvestment needed to strengthen the EU economy. These challenges were clearly identified by Enrico Letta and Mario Draghi in their respective reports and should therefore not be set aside by Commission services but rather addressed as integral components of a comprehensive single market strategy.

Finally, the external dimension of the single market is rather absent, despite being vital for value chains and exports. Safeguards must be in place to promote economic openness, productivity, and long-term competitiveness.

# 2. Why the chamber network considers the Single Market Strategy relevant

Chambers of commerce and industry see the integration of the single market as a highly relevant issue because it has a direct impact on the day-to-day reality of businesses. The extent to which the single market functions smoothly, determines how easily companies can trade, expand, and remain competitive. When barriers, divergent national rules, or unnecessary bureaucracy persist, businesses face higher costs and uncertainty. This is particularly challenging for SMEs, which lack the resources to navigate complex regulatory environments but rely heavily on market access and cross-border opportunities to grow and innovate.

As business representatives at local, regional, and national level, chambers play a key role in helping companies navigate these challenges. They provide information, advice, and practical support to firms engaging in cross-border trade, while also feeding back to policymakers where obstacles exist. This unique position gives chambers first-hand insight into how fragmentation impacts businesses on the ground.

A stronger and more integrated single market also matters for Europe's resilience and global positioning. In an uncertain international environment, it provides a stable framework that supports supply chains, investment, and the scaling of new technologies essential for the green and digital transitions. This is why chambers of commerce and industry consistently highlight the single market not as an abstract ambition, but as the foundation for growth, competitiveness, and long-term prosperity in Europe.

# 3. Eurochambres' main messages/recommendations

### Chapter 1: Removing barriers: Doubling down on the 'Terrible Ten'

### 1. Overly complex EU rules

The growing volume of legal acts makes it difficult to grasp the full scope of the single market, often leaving entrepreneurs to spot overlaps, contradictions, or obsolete rules. We urge the consistent application of the "Think Small First" principle so that EU legislation is designed from the outset to be practical and straightforward for SMEs, as they represent 99% of EU businesses, rather than relying on corrective simplifications after the fact. The introduction of SME-friendly provisions when drafting and negotiating legislation can contribute to this goal. However, it should not become a "tick the box" exercise in the co-legislative process. Each new legislative text should include a list of compliance requirements and associated costs deriving from the legal text. Eurochambres proposes a "table of obligations" with each legal act, summarising who must comply and how. Written clearly, these tables would enable digital tools and AI to detect overlaps and help monitor the consistency and effectiveness in the implementation of legislation by member states, alongside the legal text and impact assessment throughout the legislative process. This can be envisioned as regulatory triangle composed by legal text, impact assessment and table of obligations; and all these elements should evolve during the legislative process.

- Eurochambres welcomed previous omnibus packages as important steps towards reducing regulatory impacts on businesses. We now call on the Commission to build on this momentum by proposing a new approach to making laws. As each Directorate General has been tasked by Commission President von der Leyen to stress-test the entire EU acquis, the next step is to set up a unified, interoperable EU digital platform for law-making, which would centralise texts and metadata, enable real-time consistency checks, and encourage the use of harmonised language. This would help deliver more ambitious omnibus initiatives in a more cost and time-efficient way, achieve more concrete regulatory relief.
- Eurochambres also urges the Commission and co-legislators to make swift progress with the revision of the Interinstitutional Agreement on Better Law Making (IIABLM) to ensure that the members of the European Parliament and member states adopt a common methodology to assess the impact on SMEs deriving from substantial amendments to draft legislation.
- Competitiveness checks should become a standard part of impact assessments for Commission services to ensure regulatory consistency and support innovation. We welcome the plan to make such checks mandatory, as this will help prevent negative effects on key sectors. Crucially, these assessments must be applied rigorously in practice and complemented by ex-post evaluations to capture real impacts over time. <a href="Praise from the OECD">Praise from the OECD</a> regarding the European Commission's stakeholder consultation system reflects the added value of the Commission's approach to Better Regulation, which, however, continues to register evident flaws and lacks concrete and uniform application by the Commission services.<sup>1</sup>
- The small mid-caps (SMC) definition, presented as part of Omnibus IV, extends certain provisions designed for SMEs to businesses in this new category. While the chamber network considers this positive in general, it remains unclear why only some provisions relate on different SMC definitions and how the Commission identified the staff headcount and financial thresholds, and whether this new category, covering approximately 38.000 businesses, will represent a decisive incentive for businesses to outgrow the SME threshold over the medium-term. It is also questionable whether the so-called cliff-edge effect should be considered as the sole barrier for SMEs to scale up and raises questions on the risk of simply delaying the same cliff-edge effect for SMC businesses. Lastly, such a new framework risks increasing fragmentation in the single market. The voluntary adoption of such a new category by member states (the Commission published the SMC definition as a Recommendation) risks being reflected in diverging ways in future legal acts, leading to more complexity and difficulty in their interpretation, especially for SMEs and SMCs, which could face diverging definitions when trading cross-border. Please consult our most recent position on this topic.

# 2. Lack of single market ownership by member states

 Removing barriers is essential for the ongoing development and integration of the single market. The chamber network stresses that priority should be given to eliminating existing obstacles, while the Commission should also prevent new barriers from gaining ground through comprehensive impact assessments conducted

<sup>&</sup>lt;sup>1</sup> For more information, refer to our <u>SME-Test-Benchmark-2024.pdf</u>

before adopting any new proposals. While Eurochambres supports the Commission intention to put forward a Single Market Barriers *Elimination* Act, its validation will ultimately depend on the actual content and effectiveness of the proposed measures once the proposal is adopted.

The Single Market Enforcement Taskforce (SMET) has achieved important progress in tackling barriers. SMET should work with greater transparency and closely and consistently engage with stakeholders from the business community.

- Anchoring the single market at the centre of national policymaking is crucial for Europe's long-term competitiveness. In this context, Eurochambres encourages national governments to appoint single market sherpas, particularly those that have not yet taken sufficient action. These sherpas should liaise regularly with the business community, take their concerns into account, and bring them into discussions with their peers at EU level, supporting to efforts to reduce barriers. Their role should remain strictly practical, without becoming politicised or serving other agendas.
- Eurochambres supports linking EU spending to regulatory reforms, recognising its potential to incentivise national measures that support single market integration. At the same time, it is crucial that this stance on financial conditionality does not result in withholding essential funding from business support organisations or SMEs that rely on EU support for investment, innovation, and growth. Any link between funding and reforms should be carefully designed to ensure that it reinforces, rather than limits, opportunities for all businesses to thrive within the single market.

# 3. Complicated business establishment and operations

- Start-ups and scale-ups need a flexible legal form that adapts to their evolving requirements, particularly in the scale-up phase and during subsequent rounds of financing. At the same time, established companies of all sizes and sectors also seek clearer, more efficient rules for setting up new entities, subsidiaries, or similar ventures. A new 28<sup>th</sup> regime should therefore be accessible to all companies, not only so-called 'innovative companies' or start-ups, and its name, whether an EU-wide brand or label, should reflect this broad applicability.
- An optional 28<sup>th</sup> regime modelled on a simplified, fully digital private limited company, emerges as a more sensible approach offering flexible governance, limited liability, no public-offering rules and easier cross-border use and recognition to all companies. Widespread availability would mitigate cliff-edges, reduce the need for costly reincorporations, and limit legal uncertainty that may arise during the course of a company's expansion.
- Should the Commission decide to move forward with such proposal, Eurochambres urges co-legislators to ensure a simpler and business-friendly framework, that focuses strictly on what is necessary, and applies the proportionality principle with care. Furthermore, the choice of national legal forms should avoid unintended negative consequences for businesses, such as favouring certain EU legal or commercial forms through relief measures that are unavailable to others. For more information, please consult our input to the public consultation on the 28<sup>th</sup> regime.
- Any project to establish a European Commercial Code, even if complemented by a 28<sup>th</sup> regime, needs to be thoroughly discussed. It would be of interest to companies

only if it goes beyond consolidating existing regulations, delivering a substantive, systematic revision of the legal framework that results in genuine simplification.

Eurochambres takes note of the Commission's intention to update the 1994 Recommendation on the transfer of businesses and urges swift action in collaboration with the chamber network. As stressed in our recent call "10 Suggestions to Support Business Transfer in the EU", each year, approximately 450,000 firms, employing 2 million people, are transferred across the continent, with 1 in 3 businesses facing the risk of unsuccessful transfers. The chamber network stands ready to support the Commission services and facilitate the continuity, scale-up, and growth of businesses building on successful initiatives of chambers of commerce and industry such as Transentreprise, an online platform provided by French CCIs, and training courses and certifications such as the 'Company takeover: building an entrepreneurial project' and vocational qualifications as vocational qualification 'Company Manager, SME Developer'.

# 4. Recognition of professional qualifications

- Eurochambres strongly supports the removal of barriers to the recognition of professional qualifications as outlined in the Strategy. Delays, administrative burdens, and fragmented systems continue to hinder mobility and worsen labour shortages, particularly for SMEs, which face disproportionate challenges in navigating crossborder recognition procedures.
- We welcome the proposed actions to accelerate recognition processes, e.g. through the greater use of digital tools and the expansion of automatic recognition mechanisms. The Union of Skills' Skills Portability Initiative offers a chance to tackle these challenges, but its success will depend on going beyond formal qualifications and addressing real labour market needs. Several principles must guide this effort:
  - Skills portability must be comprehensive, and demand driven. It should cover not only formal qualifications but also validated non-formal, informal, and workbased learning. Portability must reflect the actual skills sought by employers, not just those recognised by regulatory bodies.
  - Recognition of third-country qualifications must be improved. Frameworks must facilitate the smoother and faster integration of international talent, particularly in sectors with structural shortages. Given the heterogeneous nature of the European context, characterised by diverse educational and regulatory systems, varying standards, and different levels of progress in non-formal learning, the harmonised recognition of professional qualifications remains a complex challenge. However, improvements are possible to facilitate faster integration into the labour market. Chambers can play a key role in supporting this process on the ground.
  - A pragmatic step could be a sector-specific approach, focusing on industries experiencing labour shortages. Involving chambers could support a practical, employment-driven strategy by identifying concrete skill needs and contributing to the design and implementation of training frameworks. Such an approach would help meet the immediate needs of the labour market while laying the foundation for more harmonised recognition of qualifications across Europe.

- Chambers must be directly involved in the co-design and implementation of recognition frameworks, including Common Training Frameworks. With varying levels of involvement across the EU, chambers often act as trusted intermediaries between businesses, education providers, and public authorities. Strengthening their role would ensure that recognition frameworks are better aligned with labour market needs and more effectively implemented on the ground, particularly in countries where VET is a regional competence and coordination is currently fragmented.
- Companies in the single market also have an interest in ensuring that skilled workers
  are available to them quickly when there is a specific need. In the case of regulated
  professions and qualifications, there is an existing regime that has reduced the
  previous barriers. The 2023 Commission Recommendation on the recognition of
  qualifications of third-country nationals contains recommendations that should first
  be examined in practice.
- Leveraging digital technologies, including AI, could accelerate processes, but it requires technical solutions agreed upon by member states. EU financial support could serve as an incentive.
- At the same time, the automatic recognition of professional qualifications, as laid down in the treaties, should not lead to the sovereign decision of the member states being restricted. This is because the levels of qualification depth continue to differ – and are also central to the quality of products and services in the respective economies. In the respective national economy, Common Training Frameworks can only provide assistance for the recognition of formal recognitions.

# 5. Long delays in standard-setting that weigh on innovation and competitiveness

- The development of harmonised European standards should remain a key priority, as they will facilitate global trade and international cooperation. Strengthening the EU's influence in international bodies like ISO and IEC is crucial, and this can be best achieved through a transparent, open standardisation system that complies with WTO rules, as well as being economy-driven or at least heavily shaped by businesses' expertise and involvement.
- Furthermore, Eurochambres believes that the proposed provisions on common specifications will undermine the public-private partnership that has successfully and consistently contributed to an open, inclusive, transparent and industry-led European standardisation system. More information could be found <a href="here">here</a>.

### 6. Fragmented rules on packaging, labelling and waste

 We welcome the planned elimination of fragmented regulations on packaging, labelling and waste, which represent major hurdles for companies' free movement of goods. In addition, simplification of the recently adopted EU Packaging Regulation (PPWR) is also essential, as some of its provisions are completely unrealistic or contradictory with other environmental legislation. The application of the EU Packaging Regulation should be postponed by at least two years. During this time, the Regulation should be revised and streamlined.

- Eurochambres calls on the Commission to ensure that the forthcoming environmental simplification package effectively reduces the barriers posed by national EPR registration requirements for packaging and electronic waste take-back. Simplifying procedures and limiting reporting to once a year will be crucial to enable small manufacturers and retailers to operate across the single market without disproportionate costs, as outlined in Eurochambres' latest input on the environmental omnibus.
- The chamber network supports the creation of a genuine single market for waste and secondary raw materials, as recommended in the Draghi report. The reform of endof-waste and by-product criteria in the upcoming Circular Economy Act will be critical. To ensure a feasible, practical and proportionate framework, these criteria must be developed in close cooperation with businesses. Otherwise, they risk imposing additional burdens on companies, further deteriorating Europe's competitiveness.
- The Digital Product Passport (DPP) has potential to facilitate compliance, but only if
  information collection is strictly limited to what is necessary. Costs must remain
  proportionate for all actors, particularly SMEs, and access to confidential information
  must be restricted to authorised actors. Lessons must be also learned from previous
  digitalisation efforts, notably the European Chemicals Agency's <a href="SCIP database">SCIP database</a>,
  which has created administrative burdens without delivering clear added value.

# 7. Outdated harmonised product rules and a lack of product compliance

- Eurochambres agrees with strengthening the cooperation between national customs and market surveillance authorities. This will speed up the detection of unsafe or noncompliant products from third countries and ensure that checks focus on high-risk imports, while relieving compliant businesses from unnecessary inspections.
- "Market surveillance should be carried out at the same level in all EU countries. To this end, coordination at European level is desirable. Compliance with product regulations must not place a disproportionate burden on companies that are already compliant. Tools such as the digital product passport, combined with a well-connected system of reporting centers and interoperable digital interfaces, could play an important role in protecting sensitive company data and reducing compliance costs. Before presenting a proposal, the Commission should consult with stakeholders to better understand the potential impact on European companies.
- The chamber network welcomes the idea of revising the New Legislative Framework (NLF) if the objective is to streamline all product-related regulatory procedures and ensure effective compliance across the EU. Harmonised definitions e.g. economic operators, consistent enforcement, and reliable application of the mutual recognition principle, with the support of up-to-date guidance, are essential to prevent legal uncertainty and uneven implementation of the NLF.

### 8. Restrictive and divergent national services regulation

 When deepening the single market for services, it is essential to adhere to the fundamental principles of Union law. These include the distribution of powers between the Union and the member states as provided for in primary law, as well as

the principles of subsidiarity and proportionality. Differences between member states alone do not justify European intervention in national legal and economic systems.

Guidelines on the right to provide temporary cross-border services are of limited use.
National service regulations should be checked in advance for EU compatibility, but
current notification procedures under the Services Directive do not work smoothly.
Given past reform attempts failed, a new ex-ante screening approach could be
needed to improve transparency, prevent protectionism, and limit gold-plating.

# 9. Burdensome procedures for temporary posting of workers

- Regarding the revision of Regulation EC/883/2004, under negotiations since 2016, Eurochambres advocates for the exemption from the requirement to apply for and carry an A1 form when it comes to short business trips. Furthermore, it should be possible to submit the A1 form on request instead of having to carry it physically.
- When it comes to the Commission proposal for a public interface for the declaration
  of posting of workers, chambers insist that the use of the multi-lingual public interface
  must be mandatory to ensure efficient access to information in all member states.
- Eurochambres is sceptical about expanding the powers of the European Labour Authority given budget limitations and the absence of an urgent need to do so.

# 10. Territorial supply constraints

"Territorial supply constraints" remains a concept that has not been fully analysed.
Further research could help clarify the underlying factors and the ways these
perceived constraints impact consumers and businesses. The Commission should
consider organising workshops and conferences to foster discussion with
stakeholders and gather diverse perspectives before considering any further
measures.

# **Chapter 2. Boosting European Services Markets**

Services offer the strongest growth potential in the EU, but national barriers and differing regulations still limit opportunities. Eurochambres supports the Commission's sectoral approach as the most practical way to achieve agreements, while stressing that national legal frameworks must be respected.

- Eurochambres supports the Commission's plans to lower barriers within the single market in the area of construction, as well as to simplify permitting and planning procedures to increase the supply of housing. However, such efforts must not compromise quality and safety standards. The forthcoming Construction Services Act, European Affordable Housing Plan (Eurochambres most recent position on this topic can be found <a href="here">here</a>) and the European Strategy for Housing Construction should accelerate permitting procedures, reduce bureaucratic hurdles and harmonise technical standards across member states, while ensuring safety and quality.
- In the construction sector, as well as in downstream industries such as electrical engineering and plumbing, qualification requirements must be maintained to ensure

safety and quality. However, this requires investing in (digital) reskilling and upskilling to tackle the skills and labour shortages faced by European businesses. Only with a workforce equipped with the right skills and professional qualifications can companies make the energy transition in the construction sector a success.

 For the upcoming Digital Networks Act, the chamber network believes that each subsector should be assessed for genuine adaptation needs, respecting subsidiarity and proportionality. A general push for Europeanisation is not justified, and any harmonisation of the frequency spectrum must rely on reliable data, as member state management has proven effective, particularly in challenging topographies.

# **Chapter 3: SMEs in the Single Market**

- The Single Market Strategy underestimates the SME dimension by proposing limited actions with no direct application or benefit to the over 26 million SMEs driving Europe's economy.
- We take note of the planned "Voluntary SME" (VSME) standard as an upper limit for sustainability reporting obligations in the value chain. While this is considered positive, the added value of such an action within the Single Market Strategy is very questionable. Given that this was already presented as a deliverable of the 2023 SME Relief Package and is a key point in ongoing discussions on the first Omnibus on sustainability, it underscores the Commission's lack of urgency in providing relief to SMEs. To avoid overburdening SMEs, requirements must be further simplified i.e. limited to easily available data, written in clear language, and supported by the further development of user-friendly digital tools for SMEs building on the EFRAG VSME Digital Template. Eurochambres also calls for abolishing the comprehensive module integrating guidance directly into the standards and providing an official translation of the VSME support guides and tools in all EU languages to ensure usability.
- The Commission's plan to develop a voluntary Sustainable Finance Standard for SMEs, enabling them to demonstrate their sustainability efforts and qualify for access to sustainable finance, was a key recommendation by the EU Platform on Sustainable Finance. The chamber network supports, in principle, such a standard and emphasises that a close link with the VSME must be ensured to keep the bureaucratic burden as low as possible and to encourage SMEs to use the standard.
- Eurochambres welcomes the extension of the existing SME fund, implemented by the EUIPO, for 2026 and possibly 2027. However, despite the positive initiative, SMEs lack knowledge and information on the potential benefits of protecting their intellectual property (IP) rights, as well as on the availability of such opportunities. The Commission should therefore intensify awareness campaigns targeting SMEs, building on the potential of the chamber network.
- The Commission proposes to reinforce the network of national SME Envoys. As part
  of the observing organisations of the network, Eurochambres laments the lack of an
  EU SME Envoy with coordinating responsibilities within all Commission services and
  reporting directly to the Commission President. Furthermore, the network should play
  a stronger role in the simplification efforts and provide practical examples of

redundant or obsolete legislation at national level, to align with the Commission objectives.

# **Chapter 4: Digitalising the single market**

- Digitalisation, including the "once-only" principle, should be rolled out in a businessfriendly way that genuinely cuts time and costs for companies. To achieve this, reporting requirements must be simplified, data points standardised, and automated data transfer made feasible for SMEs. Implementation costs and technical barriers must be reduced, with targeted financial support for smaller firms.
- The eIDAS Regulation should be fully enforced, ensuring uniform recognition of electronic signatures and administrative procedures across all Member States. Chambers agree with the objective of exploiting full potential of the Internal Market Information (IMI) system to facilitate policy implementation.
- The VAT in the Digital Age (ViDA) package will require structured invoices for cross-border EU transactions from 1 July 2030, using the revised EN16931 standard. Success depends on all companies being able to exchange its core elements in the prescribed format. An EU-wide tool that allows free conversion and transmission of this standard would be desirable, alongside guaranteed data security and EU-based backup solutions given the current geopolitical context.
- The European Business Wallet (EBW) should act as a single, trusted interface that helps companies understand and meet compliance obligations in different markets. European chambers of commerce and industry already provide many trusted and efficient digital services, such as company registration, legal documentation, and certification. Given their expertise, chambers should be actively consulted and involved in the development and deployment of the EBW. To achieve real added value, the EBW must build on these existing infrastructures and be fully interoperable with national platforms and national Business Registers as well as the Business Register Interconnection Systems (BRIS). Without proper integration, the EBW risks being perceived as a parallel structure, causing inefficiency and diverting resources away from established tools that businesses already use and trust.
- Interoperability between the European Unique Identifier (EUID) and individual electronic identifications (eIDs) is essential, particularly when the EBW provides information about business employees or to regulate access to individual EBWs. This interoperability is critical to enabling seamless verification, legal representation, and the use of qualified electronic signatures.
- Manual data entry imposes a particularly heavy burden on SMEs with limited administrative capacity. The EBW should use wherever possible automated data synchronization through perpetual Master Data Management (MDM) mechanisms on the basis of reliable, pre-existing data sources, such as national registers, instead of requiring businesses to re-input data multiple times.
- Regarding the Digital Product Passport (DPP), its usefulness depends critically on the establishment of a standardised, harmonised system for product information along the entire supply chain. This standardisation is vital to ensure

consistent data quality, interoperability, and traceability from product creation to endof-life and should replace repetitive reporting requirements in various CRS and environment-related legislative acts.

- Technical standards for the DPP are currently under development and are not expected to be formally adopted before mid-2026. Following this, companies will require a minimum transition period of 24 months to adapt their IT systems, workflows, and staff training processes. Additionally, the high granularity of data required, down to individual product identifiers, raises legitimate concerns regarding the protection of trade secrets and intellectual property, which need to be carefully addressed to facilitate practical implementation.
- Companies should not be expected to bear the full financial burden associated with automated data collection, storage infrastructure, and ongoing system management required by the DPP. A fair cost-sharing mechanism (e.g. between companies, consumers and public sector) or a support framework must be put in place to avoid disproportionate expenses on businesses, particularly for SMEs.
- Harmonised information obligations across EU regulations must be ensured to avoid overlapping information requirements within the DPP. In addition, the DPP must be fully aligned and integrated with the EBW to avoid businesses facing duplicate information requests and incurring additional operational costs.

# **Chapter 5 – Enforcing respect of single market rules**

 A fair and consistent framework is essential to ensure all companies operate on a level playing field. In this regard, the Commission, as guardian of the Treaties, must ensure coordinated, transparent collaboration between European and national authorities when upholding justice. Delays and wrong implementation of EU legislation as well as rule of law deficiencies in national judicial systems that undermine companies' operations must be addressed and mitigated.

Eurochambres welcomes the stronger focus on enforcing single market rules, as timely and correct implementation of EU law is essential for a resilient and competitive market. Measures such as the reinforcement of SOLVIT are important to address weak national implementation, while infringement proceedings and EU pilot procedures should be based on legal considerations and accelerated.

• The chamber network supports strengthening SOLVIT but stresses that sufficient staff and financial resources are needed at both EU and national level to prioritise business cases and speed up procedures. Currently, under-resourced national centres limit SOLVIT's effectiveness as a reliable dispute resolution tool for single market issues. We call for clarification on the concrete follow-up steps that will be taken to address structural issues unresolved by SOLVIT and long-standing barriers that SMET has so far been unable to overcome.





The association of European chambers of commerce and industry – represents more than 20 million businesses through its members and a network of 1700 regional and local chambers across Europe. Eurochambres is the leading voice for the broad business community at EU level, building on chambers' strong connections with the grass roots economy and their hands-on support to entrepreneurs. Chambers' member businesses – over 93% of which are SMEs – employ over 120 million people.

Previous positions can be found here: https://bit.ly/ECHPositions

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