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**NOTE**

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From: General Secretariat of the Council  
To: Delegations  
Subject: Presentation by BusinessEurope (agenda item 3) at the Working Party on Competitiveness and Growth (Internal Market) on 10 July 2025

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Delegations will find attached a presentation by BusinessEurope, with a view to the discussion by the Working Party on Competitiveness and Growth (Internal Market) at its meeting on 10 July 2025.

This document contains a presentation by an external stakeholder and the views expressed therein are solely those of the third party it originates from. This document cannot be regarded as stating an official position of the Council. It does not reflect the views of the Council or of its members.

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# Strategy for making the Single Market simple, seamless and strong

First assessment by BusinessEurope

Working Party on Competitiveness and Growth -  
Internal Market  
10 July 2025

# First assessment: Positives

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- The business community's concerns are broadly reflected in the strategy, and many measures are concrete and ambitious
- Market fragmentation is addressed with a strong focus on the prioritised barriers of the Single Market ("the terrible 10")
- Reiteration of the Commission's commitment to further simplification of EU Single Market rules
- Paradigm shift in EU spending: linking it to regulatory reforms by Member States to remove Single Market barriers
- Reinforced Single Market governance and implementation of Single Market rules at Member State level



# First assessment: Negatives

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- Lack of a mid-to-long term strategic vision and KPIs on further Single Market integration
- Risk of limited or decreasing attention towards barriers outside of “the terrible ten”
- Limited detail on how the Commission intends to strengthen its own enforcement measures (enforcement agenda expected only in 2026)
- Lack of commitment to de-politicise infringements of Single Market rules and risk of a 2-track approach to enforcement

# First assessment: Digitalisation

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- Strong focus on digitalisation of administrative procedures and paperless documentation welcome: data-based Single Market as low-hanging fruit (and a long-standing call from the business community)
- The use of digital tools must be stepped up, for example to enhance labour mobility and cross-border service provision
- New initiatives containing regulatory requirements are largely linked to simplification:
  - the omnibus on digitalisation and common specifications
  - digitalisation of declaration of conformity, product information, administrative exchanges
  - underpinning public-private partnership needs to be upheld and strengthened



# First assessment: remaining questions

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- Governance: how will the Commission – across its services – and the Council – across MSs and their national ministries – ensure commitment to removal of barriers to cross-border business operations?
- How will a potentially 2-tier approach (prioritisation) in enforcement work?
- How will the EU spending conditionality on national regulatory reforms to remove barriers be operationalised, can the digitalisation pillar be a test case?
- Will the EU push for centralisation of some functions at EU level, e.g. in market surveillance, solve structural issues persistent at national level?
- What role for the business community in the Single Market governance?