

EU Law Network

Meeting of 26 November 2025, 14:30h – 17:45h

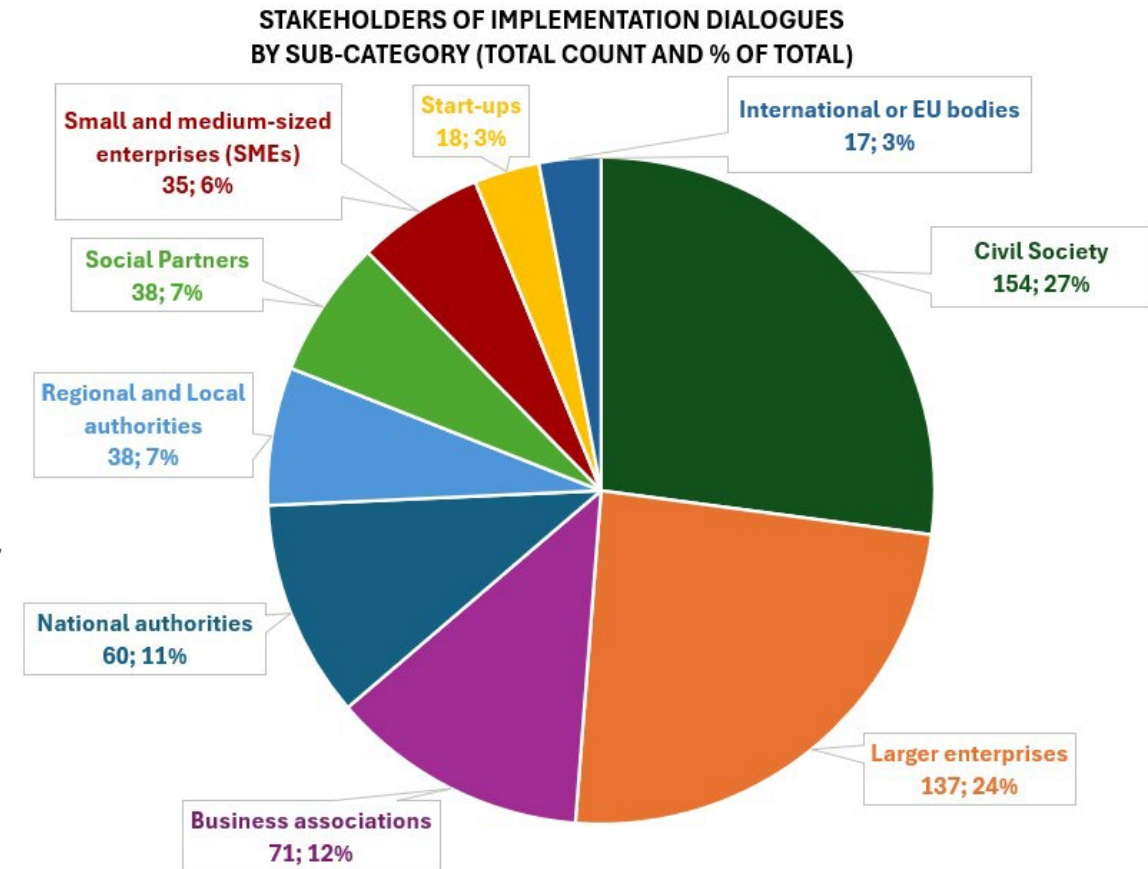
Brussels

2025 Overview report on simplification, implementation and enforcement, and statistical trends



2025 Overview report

- New approach to reporting: **Overview report**, individual **progress reports** from Commissioners and automatically updated **Europa website** with graphs and statistics
- **28 Implementation Dialogues** took place covering topics such as, environmental permitting, RRF, defence industry, high speed rail or labour mobility.
- **More than 550 stakeholders from all Member States** engaged with the EVPs & Commissioners.
- **Implementation Dialogues** have proven to be an effective tool for identifying simplification opportunities, key implementation challenges and gaps across a wide range of areas.

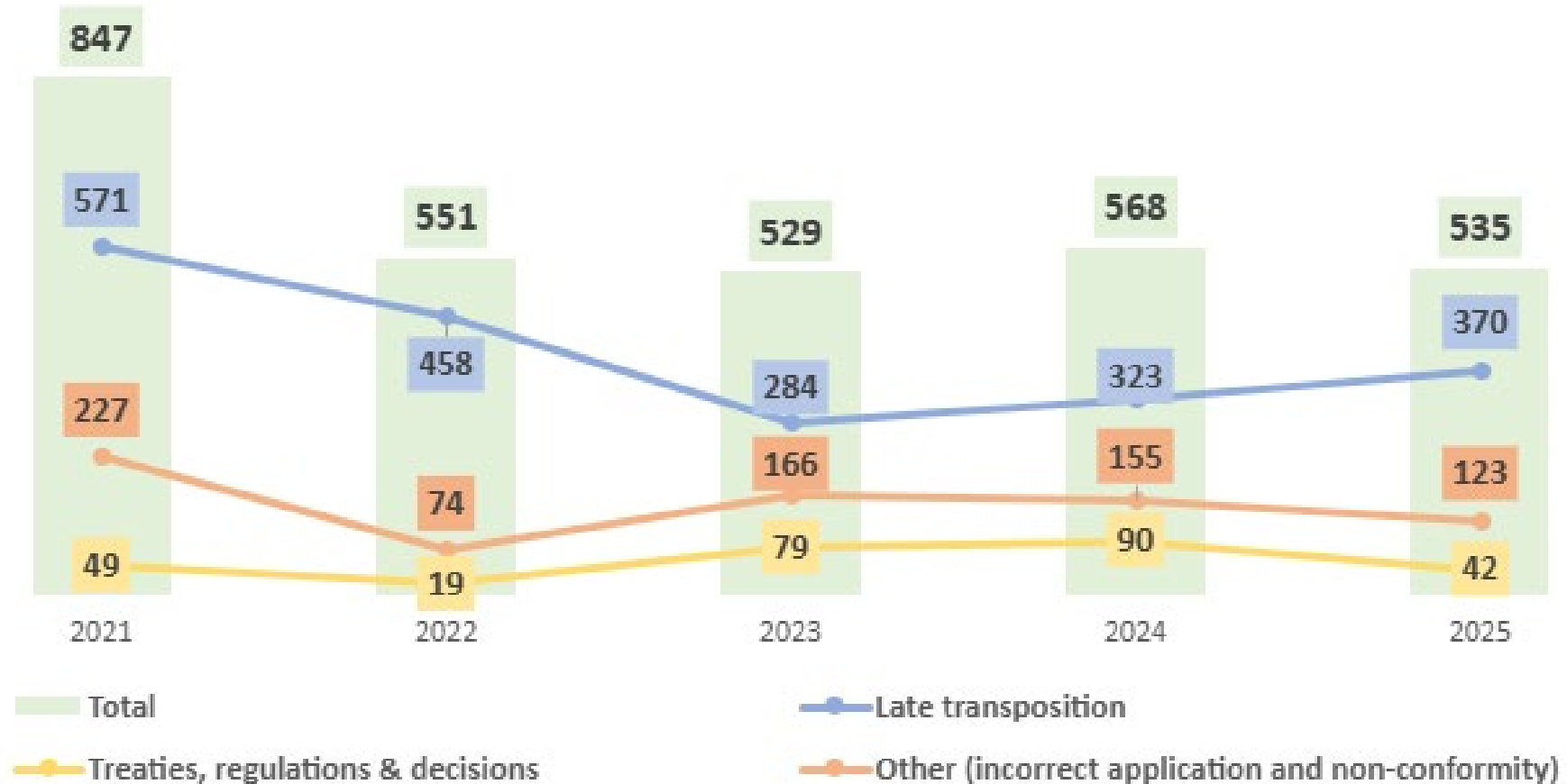


Trends in infringement procedures and THEMIS dialogues



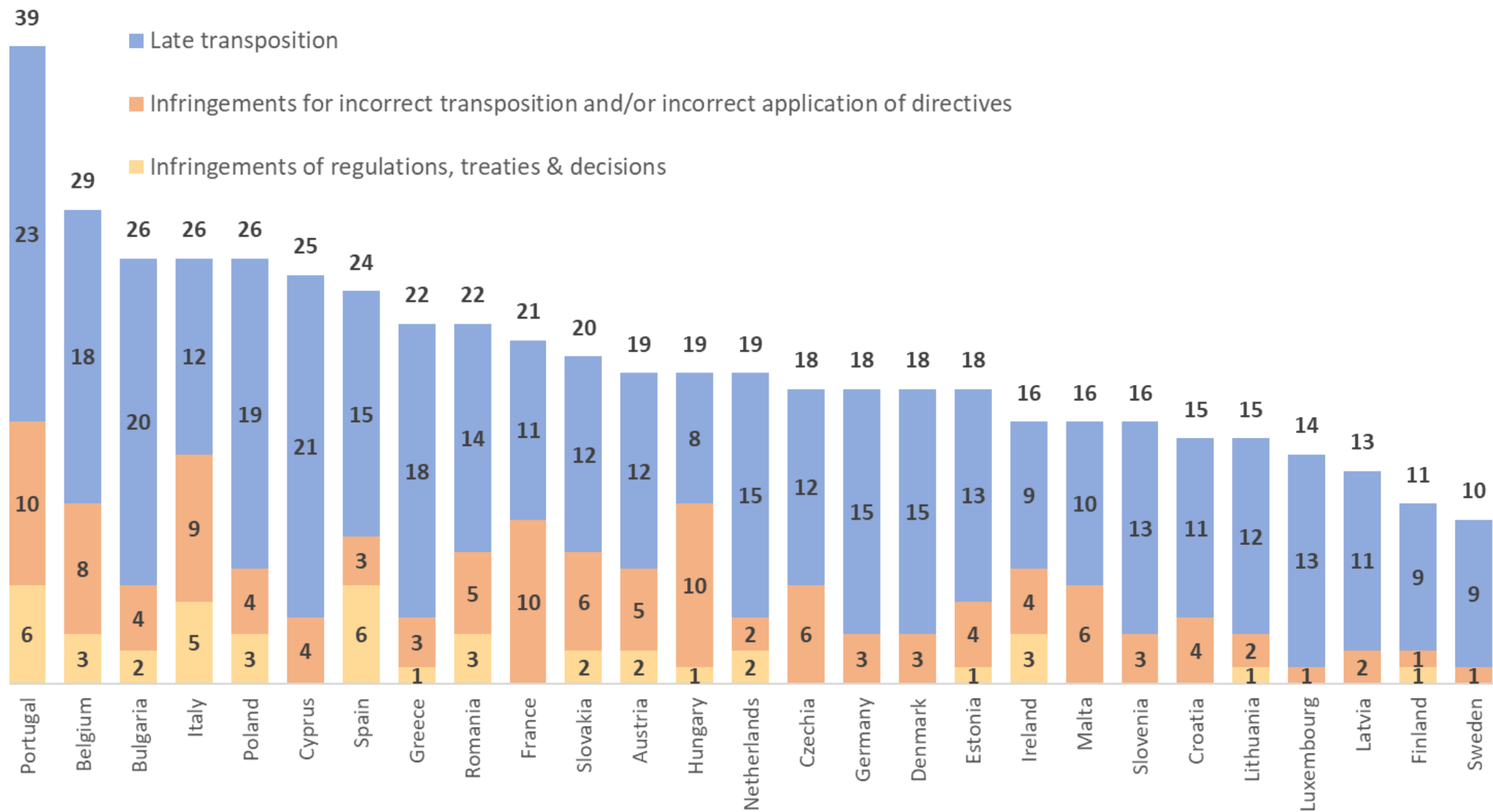
Trends in new infringement procedures

(*until 26 November 2025)



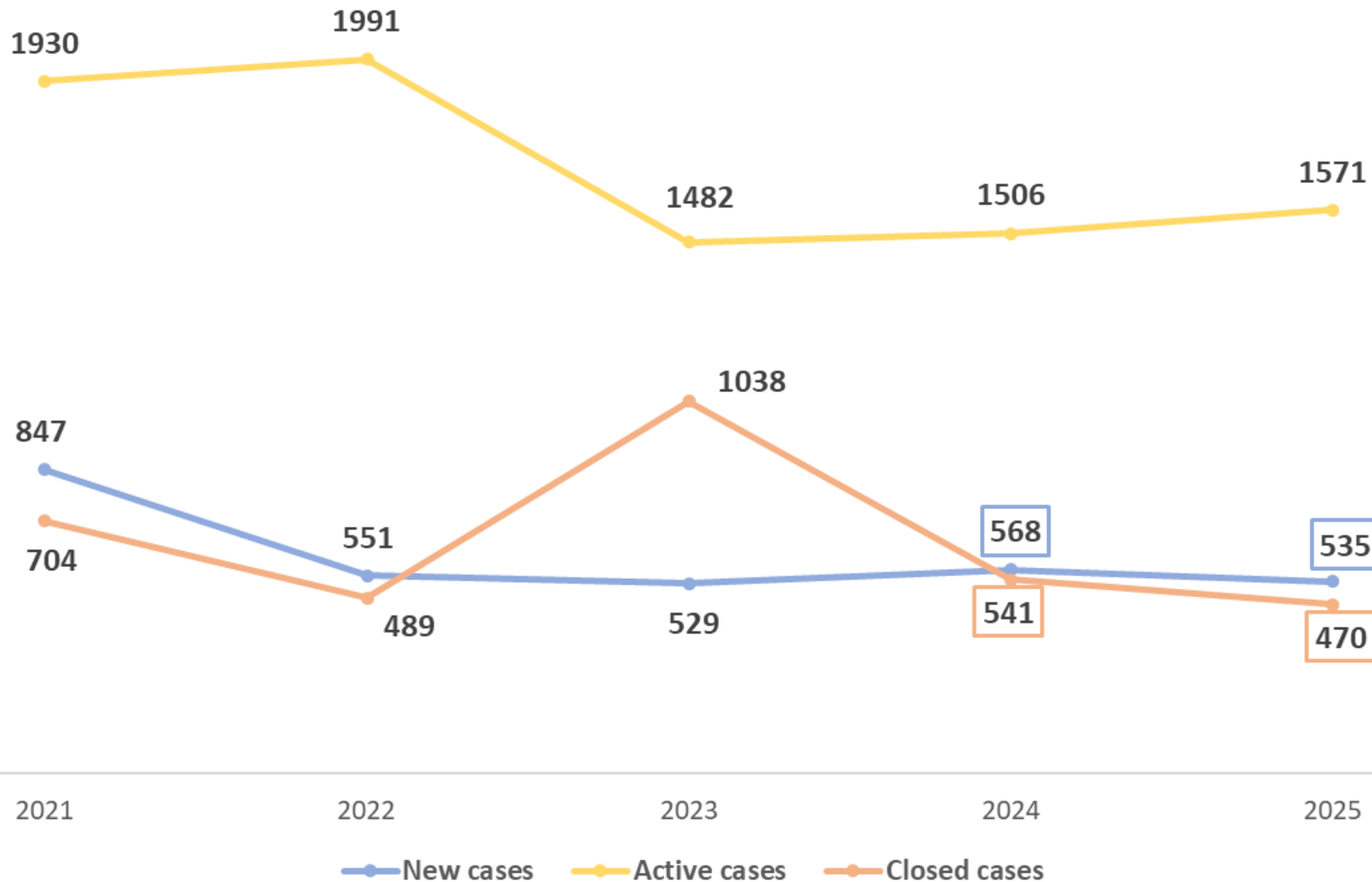
New infringement cases per MS and per type in 2025

(*until 26 November 2025)



Trends in infringement procedures

(*until 26 November 2025)



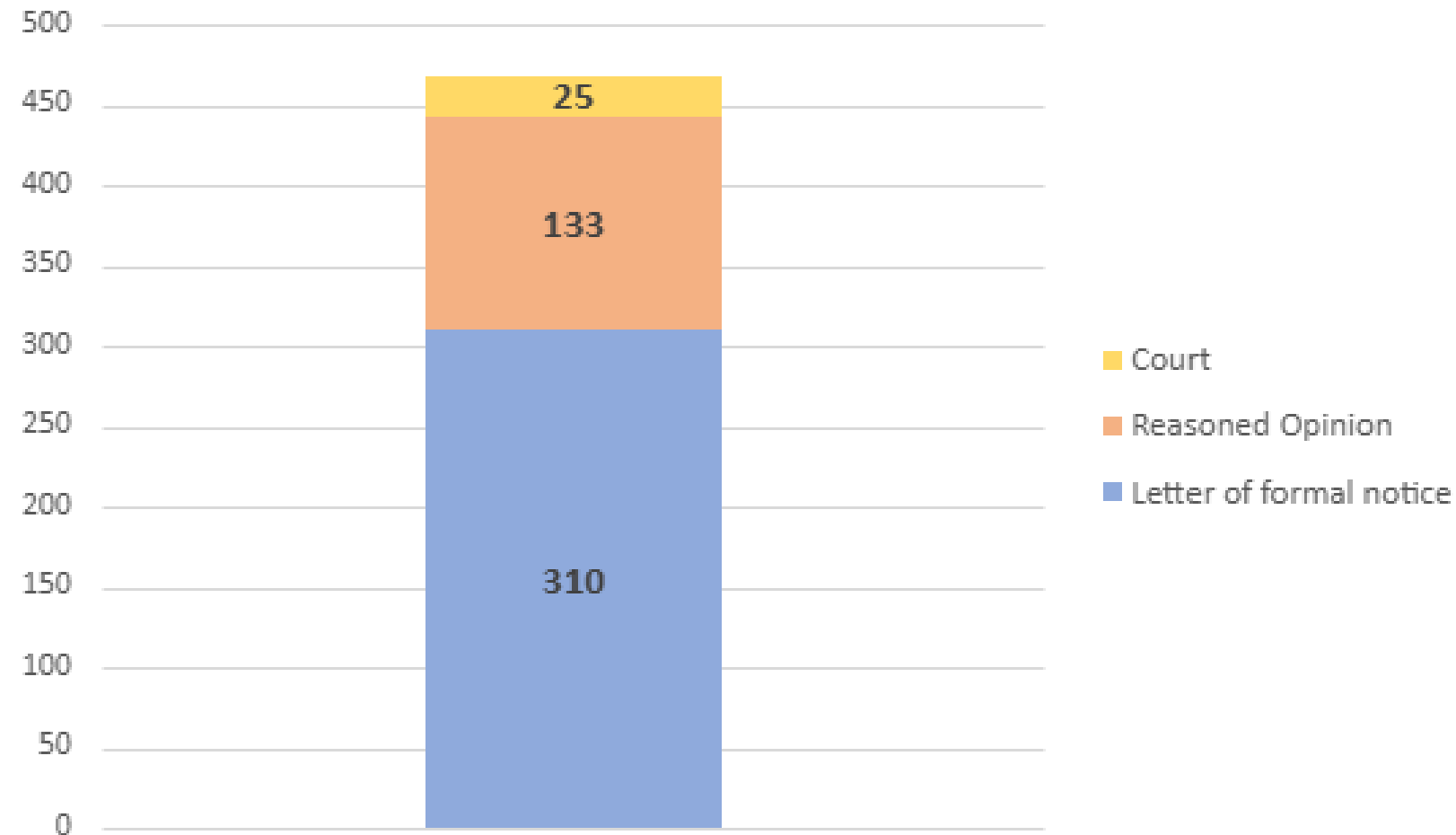
Cases open after Court ruling: **112**

Cases active since over five years: **334**



Closures per infringement stage in 2025*

(*until 26 November 2025)



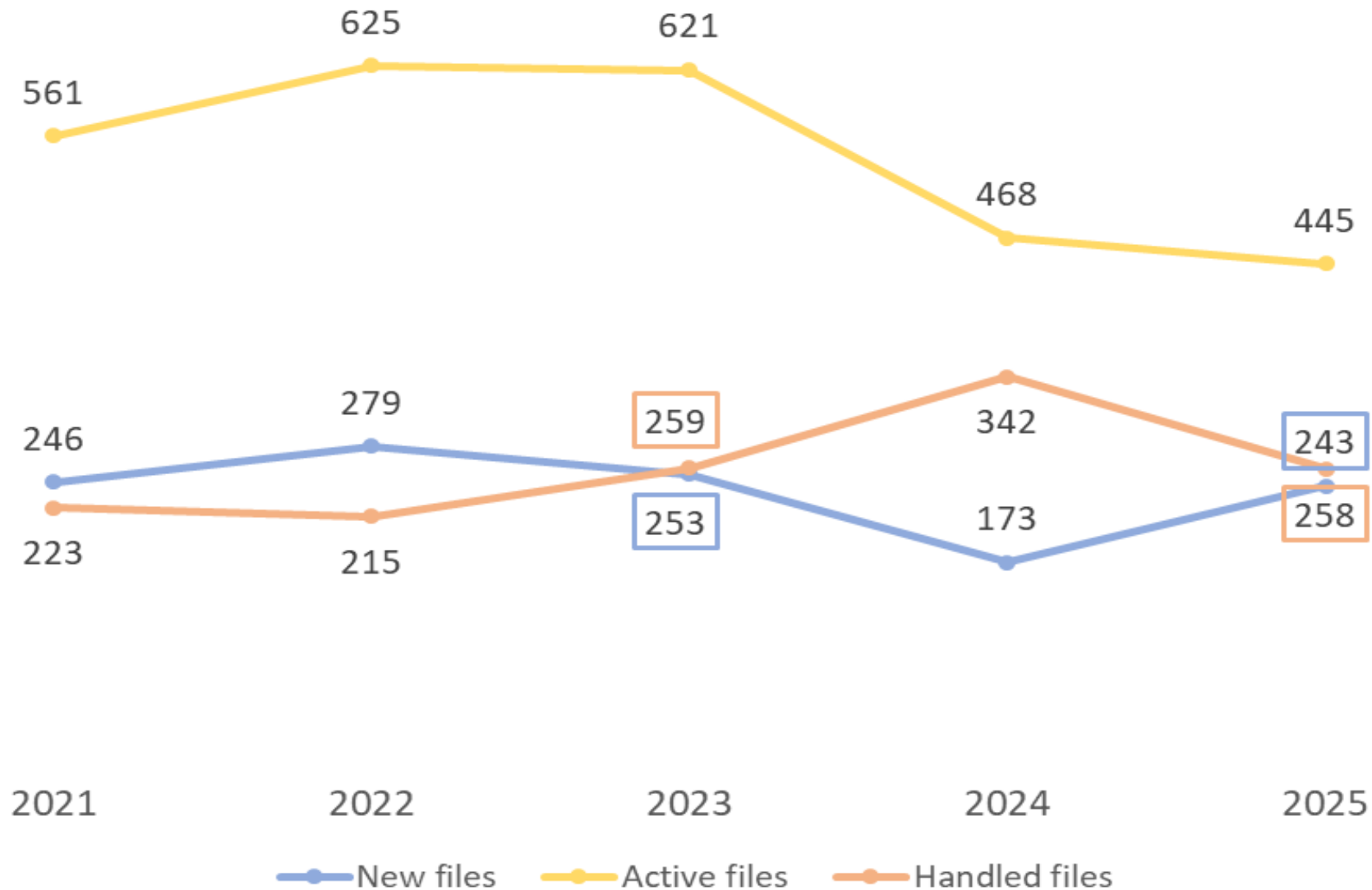
95% of cases could be closed before referral decision

63 referral decisions, including a request for financial sanctions in 19 of these



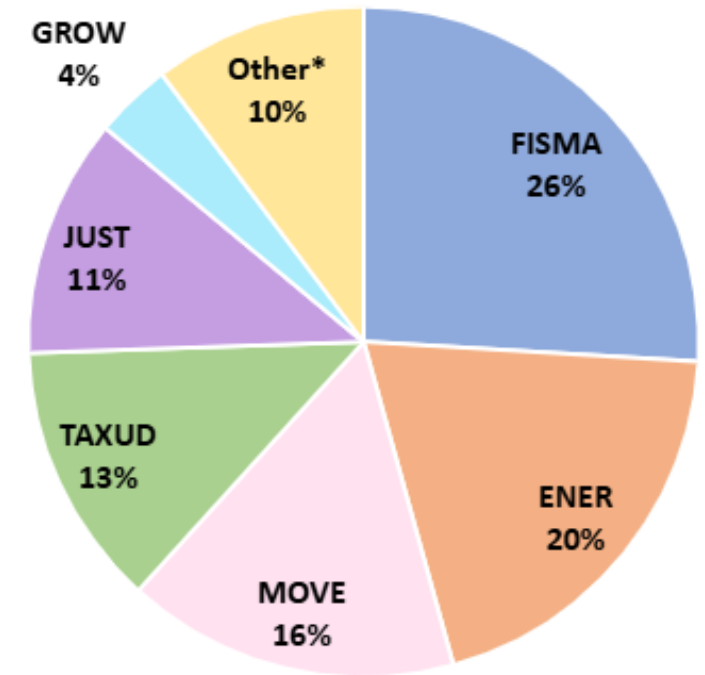
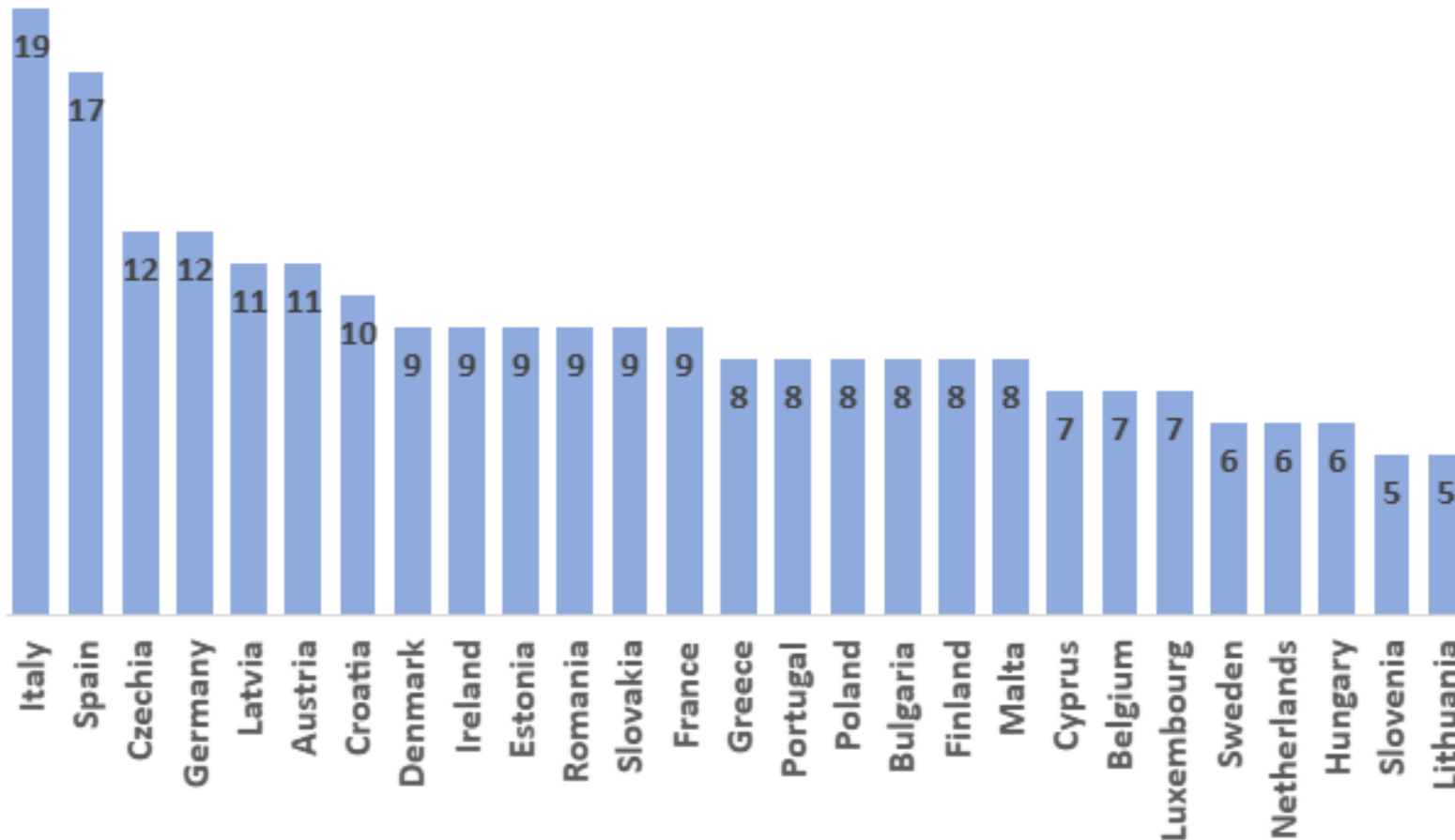
Trends for the pre-infringement dialogue

(*until 26 November 2025)



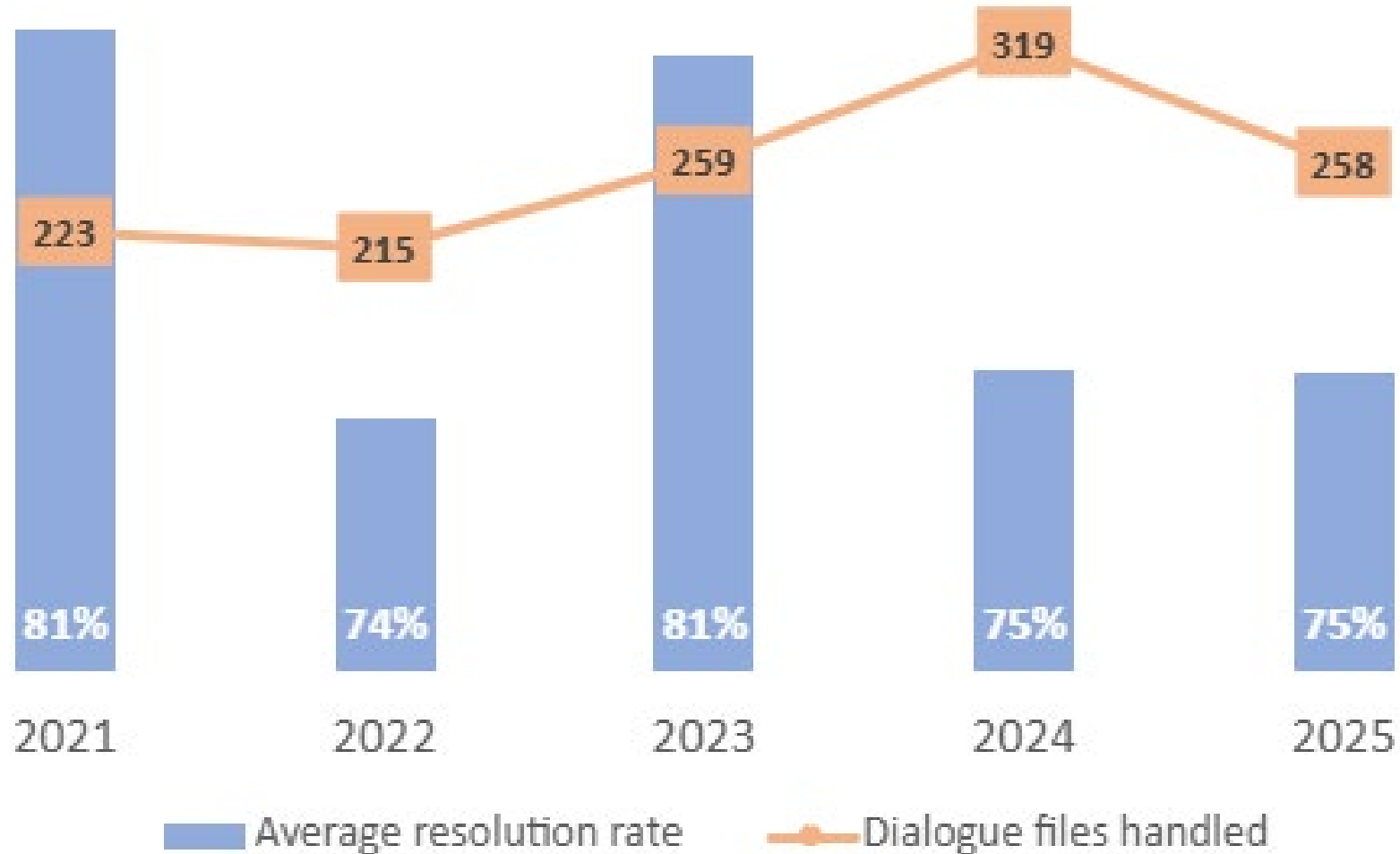
New pre-infringement dialogues in *2025 per MS and DG

(*until 26 November 2025)



Pre-infringement dialogues handled and resolution rate

(*until 26 November 2025)



Single Market Strategy

Making the Single Market simple, seamless and strong

Aleksei Trofimov, Unit GROW.A4, DG GROW
26 November 2025

Political Context

- **Single Market Strategy** Communication adopted on 21 May 2025
- Response to a request from the European Council of April 2024
- Follow-up to be done via the **Annual Single Market and Competitiveness Report**



Single Market Strategy: a new approach

The Single Market is our European home market:

- *Provides scale, strength and agility & offers a predictable investment environment*
- *Drives growth & acts as anchor for stability and resilience in uncertain times*
- *Embodies the values of our competitive social market economy*
- *Increased EU GDP by at least 3-4%, creating 3.6 million jobs: completing the Single Market would double these achieved gains*

The Single Market Strategy reinvigorates ambition to:

- *Choose Europe*
- *Build a simple, seamless & strong Single Market*
- *Reduce barriers & simplify the business environment*
- *Create opportunities for businesses & citizens and protect workers & consumers*
- *Increase ownership & commitment at all levels: EU, national, regional, local*



A new approach: key pillars of action

Fewer barriers

Doubling down on the Terrible 10 barriers

More ambition

A new approach to boosting services

More focus

On SMEs, including innovative startups and scaleups

More digitalisation

Enabling effective implementation

More simplification

Cutting red tape

Better application and enforcement

Smart & decisive actions

More ownership

Increasing political and national engagement

More synergy

Paradigm shift in using EU budget to promote reforms

More protection

Acting as a shield from unfair trade practices



Fewer barriers: focus on the “Terrible 10”



Overly complex EU rules



Long delays in standard-setting



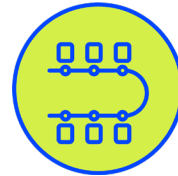
Lack of Single Market ownership by Member States



Territorial supply constraints



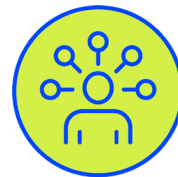
Complex business establishment and operations



Restrictive and diverging national services rules



Fragmented packaging, labelling and waste rules



Burdensome rules on posting of workers



Outdated product rules and lack of product compliance



Recognition of professional qualifications



Terrible 10: HORIZONTAL

Overly complex EU rules

- Adopt simplification omnibus packages (ongoing)
- Competitiveness checks in Impact Assessments (ongoing)
- Review national and European agencies in the field of the Single Market (Q1 2026)
- Revise the Public Procurement framework & Directive on defence and sensitive security procurements (Q2 2026)

Lack of Single Market ownership by Member States

- Call a first meeting of the high-level Single Market Sherpas (Q4 2025)
- Organise a first SMET annual high-level political meeting (Q4 2025)
- Propose a Single Market Barriers Prevention Act (Q3 2027, if necessary)

Complicated business establishment and operations

- Legislative proposal on '28th regime' (Q1 2026)
- Revise the Commission Recommendation on business transfers (Q4 2025)



Terrible 10: GOODS

Fragmented rules on packaging, labelling and waste

- Sectoral rules and in perspective DPP for labelling (Q3 2026)
- EPR Omnibus on local representatives and reporting (Q4 2025)
- Address fragmentation of EPR schemes, including through one-stop shop, and reform end-of-waste, both in Circular Economy Act (Q3 2026)

Outdated product rules and lacking product compliance

- Revise NLF on digitalisation, circularity and safeguards (Q3 2026);
- Synergies between EU and Member States' customs and market surveillance authorities and potentially establishing EU Market Surveillance Authority (Q3 2026)

Long delays in standard-setting

- Omnibus for common specifications (May 2025)
- Review Standardisation Regulation (Q3 2026)

Territorial Supply Constraints

- Develop tools to act against unjustified TSCs (Q4 2026)



Terrible 10: SERVICES

Restrictive and diverging national services regulation

- Reduce via harmonisation where based on EU law (2026)
- Recommendations where based upon Member States' law (2026)

Burdensome rules on posting of workers

- Adopt e-declaration & social security coordination legislative proposals
- Roll out ESSPASS, reinforce European Labour Authority (2026)
- Consider further measures (2026)

Recognition of professional qualifications

- Digitilise to make recognition procedures faster (2026)
- Extend automatic recognition (2026)
- Explore common rules for qualifications of third country nationals (2026)

More ambition to boost services

Services make up the largest part of Europe's economy:

- Cross-border services trade within the EU is no larger than with non-EU countries
- 60% of services barriers are of same type as 20 years ago

A new sectoral approach will inject new dynamism to the EU services market:

- Focus on sectors with high economic value & relevance to green and digital transitions
- Approach will complement the existing horizontal policy approach

Construction
Services Act
(Q4 2026)

Delivery Act
(Q3 2026)

Industrial
Services
Initiative

Guidance on
Retail (2026)

Guidance on
Business
Services (2026)

These initiatives will complement specific actions to ensure better integration of the Single Market for energy, transport, telecommunication and financial services.

More ownership and joint responsibility

- Member States called upon to name a high-level Single Market Sherpa and address national Single Market barriers
- Prioritize prevention & strengthen collaboration platforms
- Accelerate corrective enforcement & support proactive and strategic enforcement

Prevention

- Full use and reinforcement of existing preventive tools on EU level
- Propose a Single Market Barriers Prevention Act (Q3 2027, if necessary)

Collaboration

- Call a first meeting of the high-level Single Market Sherpas (Q4 2025)
- Organize a first SMET annual high-level political meeting (Q4 2025)
- Strengthen national SOLVIT centers and the Network (Q4 2025)
- Systematic follow-up on issues identified by SOLVIT and SMET (as of Q2 2025)

Correction

- Respond to significant breaches indicated by stakeholders & focus on priority enforcement areas
- Present the first Annual Single Market enforcement agenda (Q1 2026)

Thank you



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EU Law network meeting

26/11/2025

**Marie Boscher, Deputy Head of Unit
GROW E4 - BARRIER REMOVAL**

Content overview



What is SOLVIT and how it works



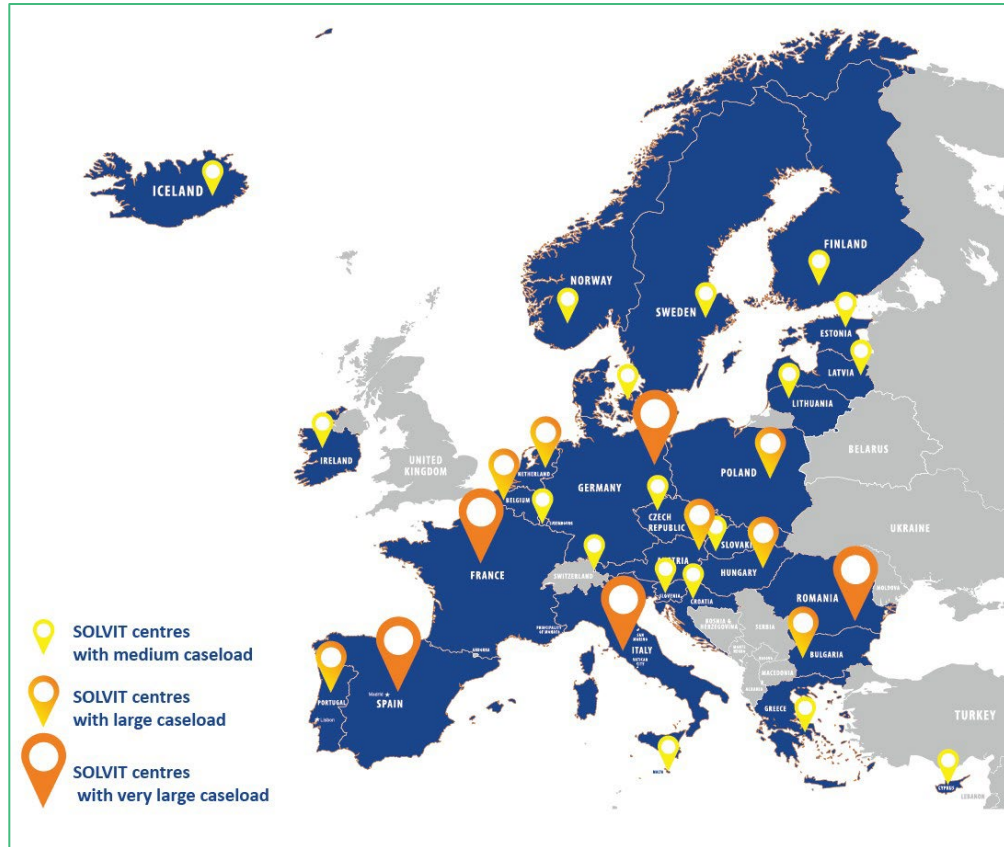
The Single Market Strategy and SOLVIT



SOLVIT follow-up actions to the Single Market Strategy



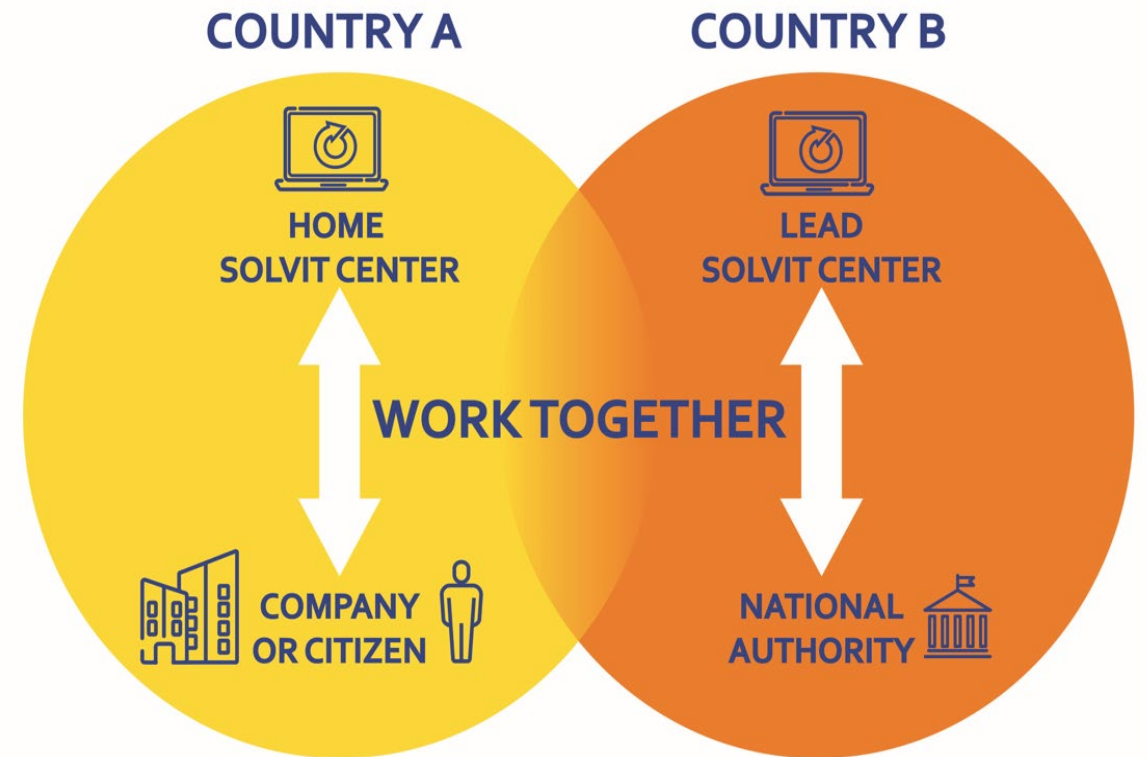
A problem-solving network for the single market



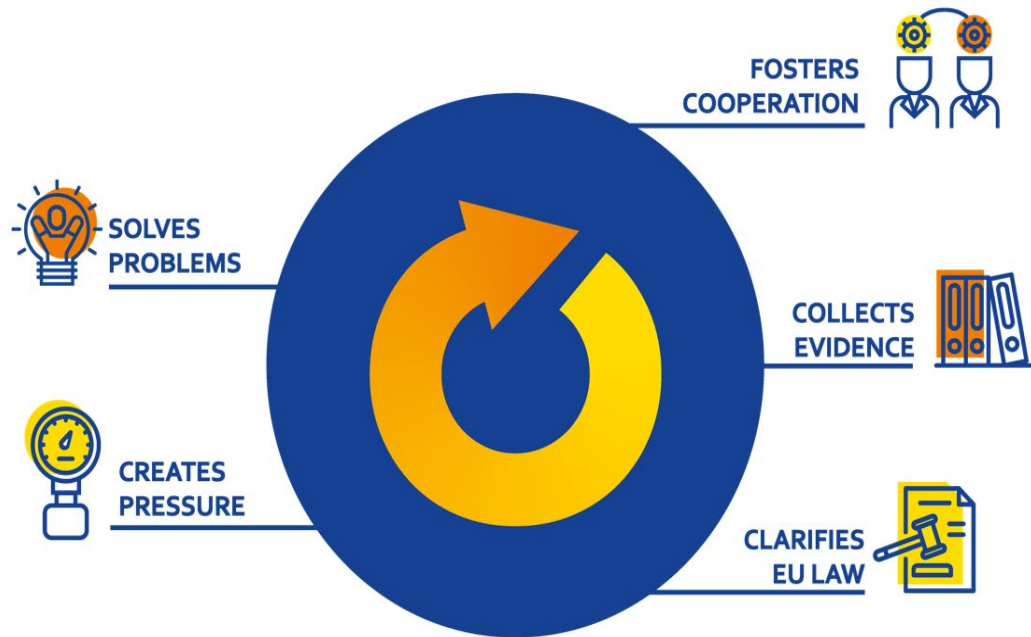
- An informal network of centres within national administrations
- For citizens and businesses, free of charge, when they face issues with public authorities in another country
- 3,339 cases in 2024 in many fields of EU law (like EMPL, JUST, MOVE but also FISMA, CNECT, SANTE, etc.)
- Annual reporting via Single Market Scoreboard

How SOLVIT works

1. Complaint filed via [online form](#)
2. Home Centre checks complaint is eligible
3. If case is eligible, the home centre forwards it to the SOLVIT centre in the country where problem occurred (Lead centre)
4. Lead SOLVIT Centre works with the responsible national authority to resolve problem
5. Home Centre keeps the complainant informed about results achieved.



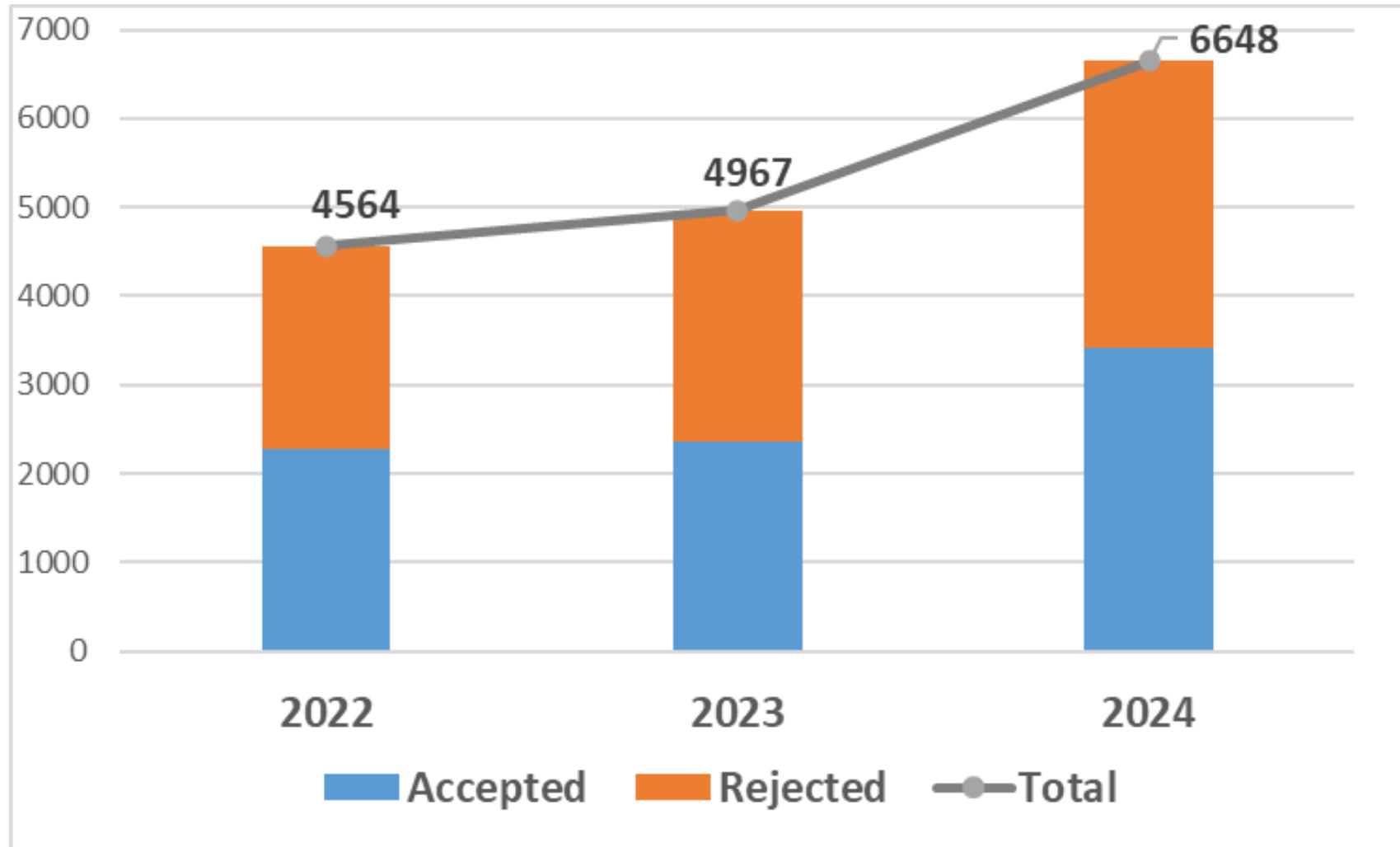
How SOLVIT works – Administrative pressure in practice



- Solves individual problems
- Administrative pressure via a system of checks and balances (2 SOLVIT centres involved and EC SOLVIT team)
- Contributes to a better implementation of EU law
- Collects evidence of incorrect application or remaining obstacles in the Single Market.

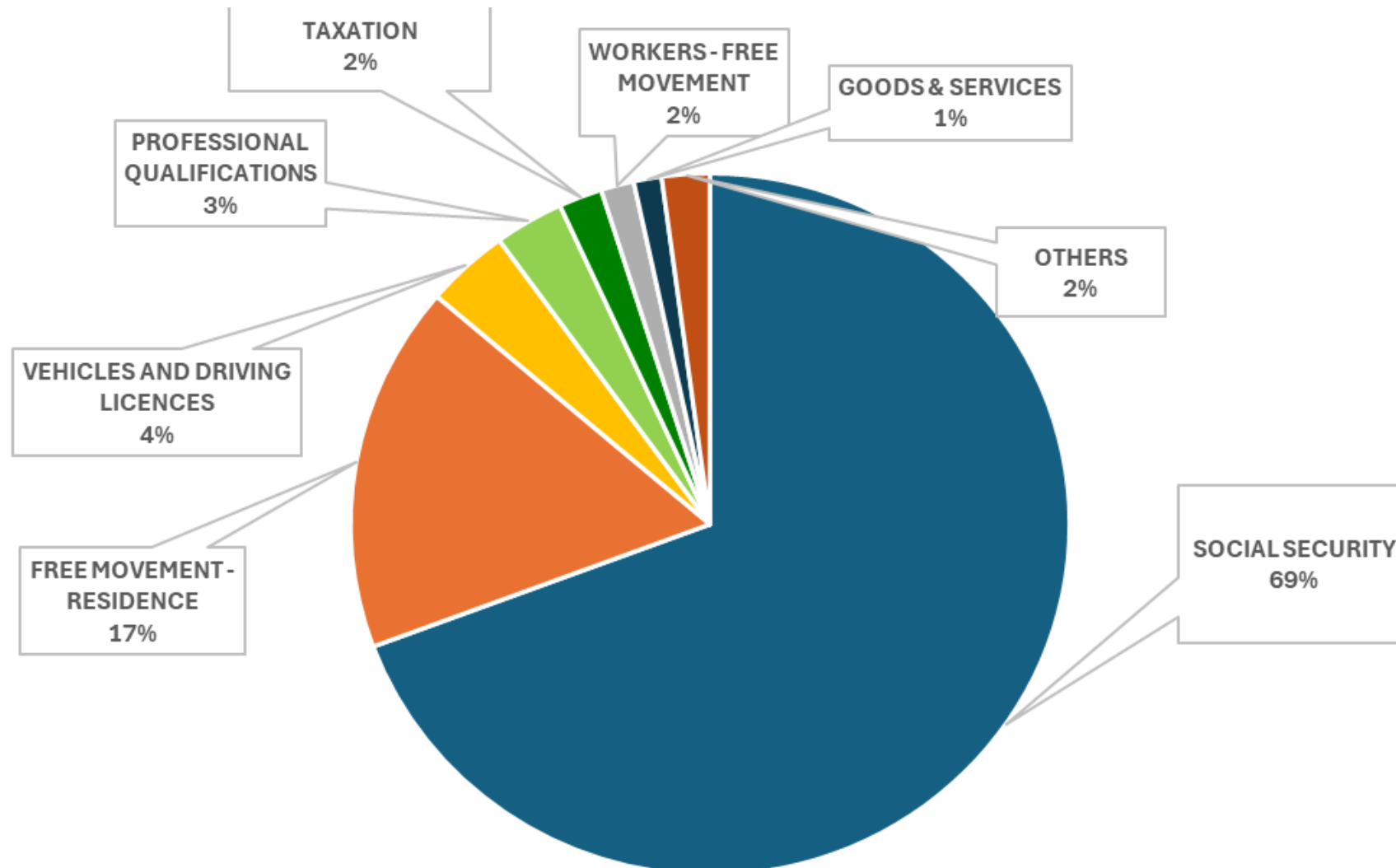
SOLVIT Network caseload

Closed cases in 2024



SOLVIT cases by policy area

Closed cases in 2024



The Single Market Strategy and SOLVIT



The single market strategy and SOLVIT

1

Strengthening SOLVIT centres: sufficient and adequate staff, improving quality of SOLVIT case-handling (information-sharing, tailored training to SOLVIT centres, better working tools: repositories of EC informal legal advice, YEA advice)

2

Systematic follow-up of systemic issues: new SOLVIT repository of systemic issues used as a basic tool

3

Better support of business cases: more efforts in reaching out businesses, cooperation with business networks (Enterprise Europe Network) and businesses organisations



Repository of issues detected in SOLVIT

Basic tool (1)

Entry number ↑↓	Status ↑↓	Policy area ↑↓	Category ↑↓	Country where the issue occurs (LC) ↑↓	Identified systemic issue ↑↓	First reported to responsible DG ↑↓	Responsible DGs ↑↓	State of play ↑↓	Key information / Latest update ↑↓	Total number of identified cases ↓
805454	Active	SOCIAL SECURITY	Old-age benefits	Netherlands	- Netherlands - Old-age benefits - Difficulties and delays	Q4 2024	EMPL	Responsible DG is aware of and is looking at the issue	18 cases in 2024 - 14 cases in Q2 2025 - 4 cases in Q4 2025	48
742932	Active	SOCIAL SECURITY	Unemployment benefits	Ireland	- Ireland - Unemployment benefits - Delays in issuing H006	Q4 2024	EMPL	To be confirmed as systemic issue	21 cases in 2024 - 25 in Q2 2025 - affecting mostly BG nationals	46
741863	Active	SOCIAL SECURITY	Invalidity benefits	Greece	- Greece - Invalidity benefits - Difficulties and delays in communicating insurance periods	Q2 2022	EMPL	Responsible DG is aware of and is looking at the issue	24 cases in 2024 (all from BG nationals) - 16 cases until Q3 2025	43
744587	Active	SOCIAL SECURITY	Invalidity benefits	Netherlands	- Netherlands - Invalidity benefits - Delays and difficulties	Q3 2023	EMPL	Solved by MS without EC intervention	6 cases in 2024 - 15 cases in Q2 2025	39
746385	Active	RESIDENCE	Non-EU family members - residence card	Sweden	- Sweden - Non-EU family members - Art. 10 residence card - Delays and difficulties	Q2 2020	JUST	MS is aware of and is looking at the issue	15 cases in 2024 - 3 cases in Q2 2025	39



Repository of issues detected in SOLVIT

Basic tool (2)

- Problem identification – definition of issue and legal area classification
- Reference to Single Market Barrier
- Actions by Member State to address the problem
- Actions by the European Commission
- List of cases (total number and SOLVIT reference).

LEGAL AREA AND IDENTIFIED ISSUE

Policy area: SOCIAL SECURITY
Category: Old-age benefits
Subcategory: Calculation of periods (aggregation)

Is the case related to EESSI (Electronic Exchange of Social Security Information)? Yes
Is the case related to cooperation and communication? Yes

Country where the issue occurs (LC): Greece
Identified systemic issue: Greece - Old-age benefits - Difficulties and delays

Key information / Latest update: 388 cases reported in 2024, 130 cases in Q2 2025.

First reported to responsible DG: Q1 2022
Responsible DGs: EMPL

State of play: Responsible DG is aware of and is looking at the issue

BARRIER

ACTIONS BY THE MEMBER STATE
Barrier as identified by SOLVIT
Linked barrier among the 'Terrible Ten'

ACTIONS BY THE EUROPEAN COMMISSION
Barrier 01.1 - Delays and difficulties in communication of insurance periods for old age benefits
#02 Lack of SM ownership by MS

List of cases

SOLVIT follow up actions to the Single Market Strategy

- Focus on 18 issues in 2024-2025

Focus on 18 issues identified by SOLVIT (1)

Lack of Single Market ownership by Member States (TT2)



- Old-age, invalidity, survivors' benefits – Long delays in granting and paying pensions and communicating insurance periods (**980** cases in 2024)
- Unemployment benefits – Long delays in processing requests for information needed for calculation of benefits (processing (**352** cases in 2024)
- Danish law obliges newly graduates in Denmark to prove knowledge of Danish to apply for unemployment benefits (**1** case in 2024)



Focus on 18 issues identified by SOLVIT (2)

Lack of Single Market ownership by Member States (TT2)



- Long delays in completing residence procedures with an impact on access to healthcare, exchange of driving licences, right to work for non-EU partners and family members (**300** cases in 2024)
- Visas for non-EU family members of an EU national – long delays and insufficient or incorrect justification of denials (**58** cases in 2024)
- Non-recognition of Portuguese ID cards in Germany as issuing authority not specified (**2** cases in 2024)
- Delays in exchanging or renewing driving licences (**24** cases in 2024)



Focus on 18 issues identified by SOLVIT (3)

Complicated business establishment and operations (TT3)



- Complex procedures (confusion as regards notifications vs prior authorisation; differences in how products are categorised, unfinished EU harmonisation) (**7** cases since 2022)
- Long delays in handling VAT returns (**18** cases in 2024)
- Technical obstacles for non-national service providers in registering with CESOP in NL (**3** cases in 2024)
- eIDAs allowing cross-border recognition of national eIDs not fully operational or integrated with public services (**8** cases in 2024)



Focus on 18 issues identified by SOLVIT (4)

Recognition of professional qualifications – Free movement of workers (TT4)



- Difficulties and long delays in issuing recognition of professional or academic qualifications → loss of job opportunities (**38** cases in 2024)

Overly complex EU rules (TT1)



- Difficulties in registering a car in another country when documents are missing – refusal by authorities to engage with first member state of registration to request declarations of non-objection (**8** cases in 2024)



Focus on 18 issues identified by SOLVIT (5)

Fragmented rules on packaging, labelling and waste (TT6)



- National rules on waste labelling and packaging impose burdensome requirements for materials and for appointment of EPR representative (**5** cases since 2022)

Outdated harmonised product rules and lack of product compliance (TT7)



- Complex procedures to market products in a member state other than the one where they were already marketed (**24** cases since 2022)



Focus on 18 issues identified by SOLVIT (6)

Restrictive and diverging national services rules (TT8)



- Discriminatory restriction under an Austrian funding scheme for works in private households (only if works were carried out by Austrian companies) (**1** case in 2024)
- Insurance intermediary registered in Germany requested to pay compulsory membership and contributions in Italy (**5** cases in 2024)

Burdensome procedures for temporary posting of workers (TT9)



- Long delays in issuing A1 forms needed to prove social security coverage when temporarily working abroad (**12** cases in 2024)



SOLVIT follow-up to the Single Market Strategy

- Package meetings, bilateral meetings with MS, meetings between DGs, SOLVIT workshops, meetings of the Administrative Commission for social security, etc. (on-going)
- Annual Progress Reports on Simplification, Implementation and Enforcement (30/9/25)
- SOLVIT ISG (20/11/25)
- Annual Single Market and Competitiveness Report – ASMCR (January 26)





Q & A

Thank you – Contact: solvit@ec.europa.eu

Transposition working group



Discussion on transposition support

Usefulness of
roadmap and
template

Centralised information in THEMIS

Easily searchable information

Possibility to cross-check information with national experts

Suggestions
for
improvement

Extended editing rights to MS casehandlers

Extraction of available information into Word

Timing and content of information provided by Commission services

Consistency of information across the Commission



Extended editing rights to MS casehandlers

MS coordinators in THEMIS/Directives

- Have access to all directives in THEMIS
- Validate and transmit notifications of transposition measures to the Commission
- Manage the MS THEMIS users
- Edit the transposition roadmap

MS casehandlers

- Have access to all directives in THEMIS
- Encode draft notifications in THEMIS/Directives
- Edit the transposition roadmap

! NEW !



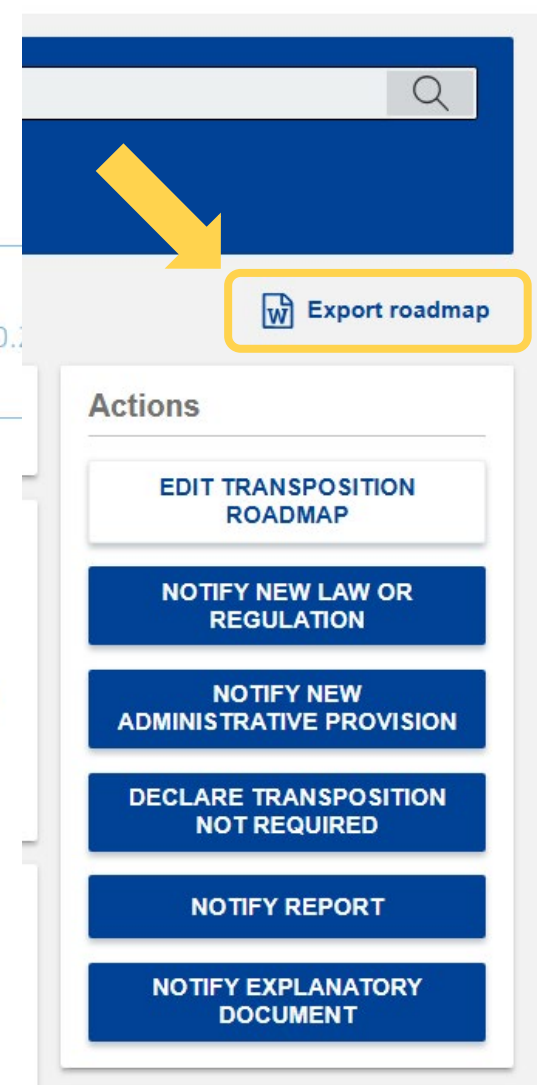
Extraction of roadmap information to Word

Directive(YEAR)NUMBER THEMIS/Directives

06.10.2023

Directive(YEAR)NUMBER
Transposition roadmap

Information exchanged between Commission services and Member States during the transposition process



The screenshot shows a user interface with a search bar at the top. A yellow arrow points to a button labeled 'Export roadmap' which has a Word document icon. Below this is a section titled 'Actions' containing several buttons: 'EDIT TRANSPOSITION ROADMAP', 'NOTIFY NEW LAW OR REGULATION', 'NOTIFY NEW ADMINISTRATIVE PROVISION', 'DECLARE TRANSPOSITION NOT REQUIRED', 'NOTIFY REPORT', and 'NOTIFY EXPLANATORY DOCUMENT'.



Clearer access to information

Improved search

Transposition roadmap (DG)

- No (4096)
- Yes (27)

Transposition roadmap (MS)

- No (4120)
- Yes (3)

Transposition roadmap expl. doc. templ.(DG)

- No (4111)
- Yes (12)

Notification emails



32024L1640 Transposition Roadmap has been added

The European Commission (DG FISMA) has added new information regarding the transposition of Directive 32024L1640.

Please consult the transposition roadmap of the directive to access the information.

Please keep the Commission services informed about the national transposition process and its (possible) challenges, as appropriate.

This concerns the following deadline(s): 10/07/2025.



Clearer access to information

Transposition roadmap DATA ADDED ^


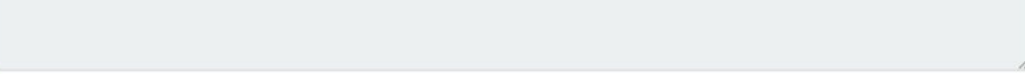
i The below information details the Member States' intentions to transpose the directive. This information should be provided, at latest, within the three months following the transmission of the completed roadmap by the Commission services through THEMIS/Directives. Once the information is added, the Member State uploads the completed transposition roadmap to THEMIS/Directives.

30 JUN 2028 (DEADLINE) 31 DEC 2026 (DEADLINE) 14 APR 2025 (DEADLINE)


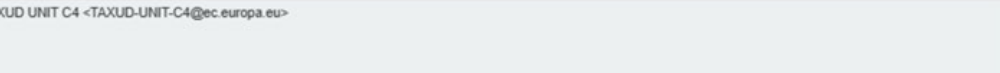
08 OCT 2025 [DG] Last updated on 08 OCT 2025 by SG Coordinator

i Roadmap updated
Information for this transposition deadline has been updated by the Commission. The fields changed are marked with a vertical stripe on their left.



Roadmap updated (marking disappears after 1 month)


? Contact details
TAXUD UNIT C4 <TAXUD-UNIT-C4@ec.europa.eu>



 

? Template - Planning and timing


 


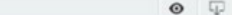
Template for explanatory documents

 [Template for explanatory d...](#)

? Supporting documents

 [Supporting document](#)



What's next?

- Enhancing our continuous cooperation by taking full advantage of the transposition roadmap and of the explanatory documents templates
- IT developments on THEMIS/Directives
- Launch of a test phase for exploring an AI solution for transposition checks
- Progress on the transposition guide
- Working group meeting early 2026



Regulations working group



Possible requirements of regulations

- Designating national competent authorities for the enforcement of the regulation
 - Laying down rules on penalties applicable to breaches of the regulation in question
 - Adopting action plans
 - Setting up of databases or registers
 - Putting in place control structures and inspections
 - Publishing transparency reports
 - Etc.
- Repeal of national law that pre-existed in the area of the new regulation



Challenges posed by regulations

- No established method or single digital tool that Member States can use to communicate on how they implement/apply regulations; communication channels EC/MS
- Identification of provisions that require national implementing measures
- What is required for those obligations of a regulation that require measures?
- No tool for the Commission to use for its support and monitoring task
- Limited available information to the Commission, high complexity of cases
- Consistent monitoring
- Way of how regulations are drafted, clarity
- Short implementation deadlines
- Etc.



Possible measures addressing these challenges

- Drafting and structure of regulations
- Regulation-embedded monitoring processes
- Implementation strategies
- **Dedicated IT tool for regulations (THEMIS/Regulations)**



THEMIS environment for Member States

THEMIS/Dialogue



THEMIS/Infringements



THEMIS/Directives



THEMIS/Regulations



**Thank
you!**

