



Report 2024 -2025

# Single Market Enforcement Taskforce

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# Introduction

*“The Single Market creates prosperity and is the first driver of our competitiveness. It has increased EU GDP by at least 3-4% and created 3.6 million jobs, with large positive gains for all Member States. Further completing the Single Market would double the already achieved gains.”, Communication on the Single Market: our European home market in an uncertain world*

In the current world marked by economic uncertainty, global trade tensions, and geopolitical instability, strengthening the EU's competitiveness and resilience is more critical than ever. Prioritising strategies to enhance these aspects is crucial to safeguarding the Union's economic prosperity and global leadership, ensuring that it is well-equipped to navigate both current and future challenges.

The Competitiveness Compass 2025<sup>1</sup>, in line with the Letta<sup>2</sup> and the Draghi<sup>3</sup> reports, lists a well-functioning Single Market as one of the five horizontal enablers for boosting EU competitiveness and promoting innovation by removing remaining barriers. It emphasises the importance of achieving continental scale in a world dominated by large powers.

With its 23 million companies and 450 million citizens, the Single Market serves as Europe's proven engine for competitiveness and resilience. However, despite its critical importance, the Single Market today remains fragmented by various barriers, which undermine the EU's economic potential and its ability to withstand external pressures.

Recognising this challenge, the European Commission published the Single Market Strategy 2025<sup>4</sup> in May 2025, which presents a plan for a simple, fair and seamless Single Market. The Strategy places a strong emphasis on addressing concrete problems encountered by businesses and citizens. It adopts a barrier-centric approach, based on stakeholders' reports. The same innovative method has been used by the Single Market Enforcement Taskforce (SMET). To complement the efforts launched with the Strategy, the President of the European Commission announced the forthcoming Single Market Roadmap to 2028 which will cover key areas such as capital, services, energy, telecoms, the 28th regime and the fifth freedom for knowledge and innovation.

1 [Competitiveness compass - European Commission](#)

2 <https://www.consilium.europa.eu/media/ny3j24sm/much-more-than-a-market-report-by-enrico-letta.pdf>

3 [https://commission.europa.eu/topics/strengthening-european-competitiveness/eu-competitiveness-looking-ahead\\_en](https://commission.europa.eu/topics/strengthening-european-competitiveness/eu-competitiveness-looking-ahead_en)

4 [The Single Market: our European home market in an uncertain world - Internal Market, Industry, Entrepreneurship and SMEs](#)

# 1. Strengthening SMET through the Single Market Strategy 2025

The Single Market Strategy 2025 is a comprehensive plan outlining decisive actions to eliminate the most harmful barriers to the Single Market, starting with the “Terrible Ten”, to reduce red tape, and to help businesses, especially SMEs, operate across the EU and expanding their activities. It also calls on Member States to do their part in making the EU market the best choice for companies, workers and consumers.

The Strategy recognises the important role of SMET as a collaborative tool for the effective implementation of the Single Market rules and the removal of existing barriers. In addition to being an inspiration for the prioritisation of the “Terrible Ten” barriers, SMET also arises as an important mechanism for addressing them. The Strategy recognises the significant achievements of the SMET and proposes to further strengthen and expand its work. To achieve this, two concrete actions are suggested: annual high-level political meetings and systematic follow-up by the Commission.

## 1.1 SMET’s organisation and the new political impetus

Since its creation in 2020, SMET has continuously refined and enhanced its organisation and working methods, drawing on accumulated experience and adapting to emerging needs. Established as a cooperative platform, SMET facilitates collaboration between Member States and the European Commission to eliminate or limit specific barriers to the Single Market. Gradually, it has enhanced the involvement of various stakeholders and authorities at national and EU level in all stages of its work. Currently, they play an important role in identifying barriers, designing projects, and ensuring follow-up actions.

SMET operates on two levels:

- 1) a high-level SMET members forum sets priorities, monitors progress, discusses specific actions and takes decisions.
- 2) a ‘Sherpa level’ engages Member States and Commission experts to discuss barriers in greater detail, develop solutions and exchange experiences.



Dealing with broad, cross-sectoral issues, SMET relies on important political leadership and support from the Competitiveness Council and the European Parliament (IMCO). The Single Market Strategy 2025 proposed to further strengthen SMET’s two-level structure by incorporating a stronger element of political steering and support. This political reinforcement aims to empower the Taskforce through an annual high-level political meeting, bringing together Ministers responsible for the Single Market and the Commission’s Executive Vice-President in charge of the Single Market. The objective of this annual meeting would be to guide the future work plan of the SMET and to discuss a limited number of its projects that require higher-level political intervention to achieve the desired outcomes.

More information about the structure, functions and objectives of SMET can be found on the [SMET website](#) and in [the previous reports](#).

## 1.2 The SMET method and its evolution

To ensure that the Single Market delivers tangible results, SMET gathers input from stakeholders on the specific cross-border challenges they encounter and examines national practices in applying EU rules. Furthermore, SMET focuses on the most pressing barriers, identifying and promoting best practices and solutions to address unnecessary national requirements.

SMET does not replace but complements other enforcement mechanisms by offering additional solutions to remove obstacles to the smooth functioning of the Single Market. Work on SMET projects is voluntary and depends on the engagement and willingness of Member States to solve specific challenges. The European Commission, through the SMET secretariat, facilitates this work and provides technical and expert support for the overall functioning of the Taskforce and individual projects.

Despite SMET’s overall success, recent feedback from stakeholders, coupled with modest outcomes from some projects, indicates that not all Single Market barriers are addressed as effectively as possible. To tackle this issue, the Single Market Strategy 2025 proposes that the Commission carefully analyse SMET’s results. If barriers remain unresolved, the Strategy suggests concrete follow-up actions, such as infringement procedures for breaches of EU law, legislative revisions, or new legislation in cases where barriers stem from the absence or ambiguity of EU rules.



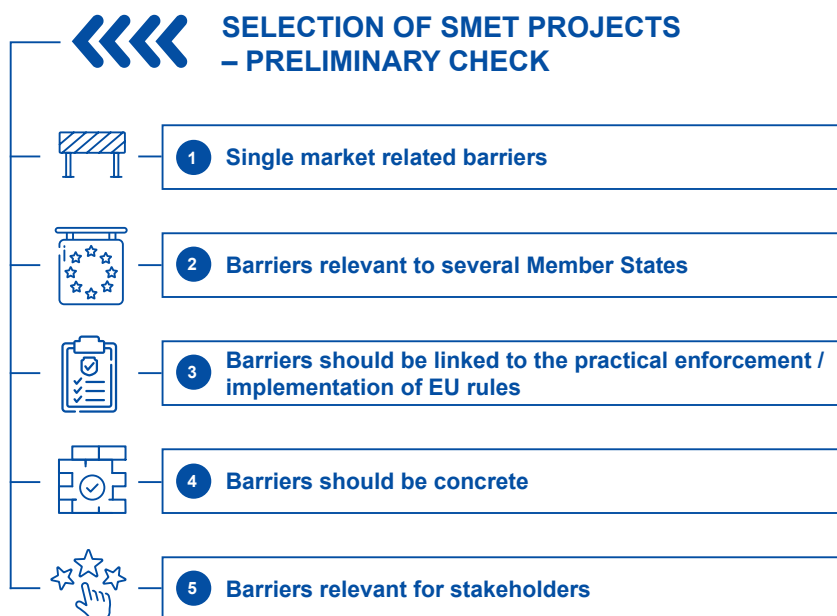
## 1.3 Strategic discussions

Alongside its regular work on sectoral projects, SMET undertook strategic discussions throughout 2025 in response to calls for strengthening and deepening the Single Market. The aim of these discussions was to gather Member States’ perspectives on key policy challenges and explore future opportunities for improving the functioning of the Single Market. For more information about the recent strategic discussions within SMET, [please refer to Section 3 of this report](#).

## 2. SMET projects

One of the key SMET tools for addressing concrete barriers faced by citizens and businesses in the Single Market are the well-defined projects. Their success depends on clearly identified problems and practical solutions (preferably best practices in Member States) which can be implemented on the ground. Areas for potential projects are selected by SMET based on input from stakeholders and Member States, with priority given to the most pressing and widely reported barriers. Preliminary checks determine whether the barriers are suitable for SMET intervention (see annex 2).

To ensure project feasibility, SMET outlines concrete steps, solutions, and best practices to tackle the identified challenges. Projects are then submitted for approval, with the number of active projects governed by a “one in, one out” policy. Participation is voluntary, allowing Member States to opt out should they choose to do so. Relevant Commission departments and stakeholders are involved throughout all stages of the projects. During implementation, SMET and Sherpa members work in conjunction with competent national authorities to assess and apply the identified solutions. Member States commit to adopt some or all the practices and report on their progress. Completed projects are documented in SMET reports and published on its website<sup>5</sup>.



In 2025, SMET closed two projects on:

- Territorial supply constraints (section 2.1).
- Facilitating the opening of bank accounts for individuals workstream (section 2.4.1).

SMET continued to work on projects which started in previous years:

- Streamlining administrative requirements for cross-border service providers (section 2.2).
- Improving the authorisation process for placing new biosolutions on the market (section 2.3).
- Facilitating the opening of bank accounts for businesses workstream (section 2.4.2).

SMET has also done a significant initial work to follow up on Terrible Ten barriers as identified in the Single Market Strategy (see section 3.3).

## 2.1. Territorial supply constraints (closed)

### Background

Territorial supply constraints (TSCs) are situations that condition the ability of wholesalers and retailers to buy products in one EU country and resell them in another. These practices potentially deprive consumers of better prices and choice in everyday products.

EU competition rules can stop these practices in some cases, but they don't cover all situations — especially when the companies engaging in these practices are not considered as having a dominant position in the market. A study commissioned by the European Commission in 2020 focused on the EU retail sector revealed that territorial supply constraints persist within the Single Market, especially when existing competition regulations may not be applicable.

### Objectives

To carry out a fact-finding exercise and understand how widespread practices related to territorial supply constraints are across Member States and consider possible actions that would help businesses when sourcing in the Single Market.

### Deliverables

- In 2024, SMET launched a project to collect further information on how different stakeholders experience TSCs and whether and how Member States had been dealing with them.
- The fact-finding exercise was carried out between September 2024 and June 2025 and confirmed the presence of TSCs in most of the Member States.
- The Directorate General for Competition from the European Commission was involved in the exercise from the beginning, providing valuable evidence from their investigations.
- Out of 25 Member States which replied to the questionnaire, 18 confirmed that retailers on their territory report the existence of TSCs.
- The most prevalent types of TSC practices are differentiation in packaging/labelling, refusal to supply, and unfair price differentiation for different markets.
- On 7 April 2025, the results of the fact-finding exercise were presented at the Stakeholder Dialogue. The event also provided stakeholders, including retailers, manufacturers, and consumers, with an opportunity to express their views. Retailers confirmed the existence of TSC practices. However, in some cases, these may be justified by national requirements or commercial reasons.
- Parallel discussions were held by the Council Working Party on the Internal Market and in the Working Party on Competition, further raising awareness of the problem.
- The work of SMET provided the Commission with a solid basis to work on a solution. It will serve as the foundation to develop tools to act against unjustified Territorial Supply constraints in Q 2026, as laid down in the Single Market Strategy 2025.

## 2.2. Streamlining administrative requirements for cross-border service providers

### Background

The potential of the Single Market for services remains largely untapped, hindered by ineffective implementation of existing rules and the persistence of national barriers, particularly in cross-border service provision. Businesses providing services across Member States consistently report that, while willing to meet social policy objectives, they face administrative hurdles that complicate, and

occasionally prevent, the provision of these services. The complexity and burden of administrative requirements for cross-border service providers when posting their workers feature prominently on the list of barriers identified during consultations with stakeholders, workshops, and reports on the Single Market. These challenges are also among the “Terrible Ten” barriers highlighted in the Single Market Strategy.

At the same time, it is crucial when pursuing Single Market objectives to respect the high social standards embedded in EU legislation and advocated by the European Pillar of Social Rights. EU legislation permits Member States to impose certain administrative requirements to monitor compliance with posting of workers rules, provided these requirements are proportionate and justified. However, there is a wide range of practices among Member States regarding declaration processes and requirements for documentation and translation.

During the Competitiveness Council on 22 May 2025, ministers held an informal lunch discussion on removing administrative barriers for cross-border service providers, based on the current SMET project. A business providing high-tech services in most Member States presented insights into the barriers in practice, identifying main problems related to unclear notification rules, excessive documentation requirements, and impractical requirements like physical liaison presence. Ministers were invited to consider national-level actions to further implement the best practices and solutions, aiming to give new impetus to the SMET project.

To streamline administrative procedures for cross-border service provision, SMET initiated the current project in 2022. Over the past four years, the project has employed a variety of tools and techniques to enhance progress in this challenging endeavour.

## Objectives

To reduce the administrative burden on businesses providing cross-border services, while safeguarding the protection of workers.

## Deliverables

- SMET has identified eight best practices designed to mitigate administrative barriers faced by cross-border service providers. The implementation of these practices should not compromise the protection of workers’ rights.

### Best practices used by some Member States and put forward in SMET

- **Targeted approach** – require a prior declaration only in the areas where there is a substantial risk for non-compliance with posting rules.
- **Short-term exemptions** – do not require a prior declaration when the cross-border service is provided for a short period.
- **Grace period** – allow service providers up until the end of the first day of work to make the prior declaration.
- **Number of documents** – require only key documents like employment contract, payslip, and timesheets.
- **Providing documents** – give service providers a reasonable time to submit documents if requested.
- **Translation requirements** – allow service providers to submit documents in any EU language.
- **Physical presence of contact person** – allow service providers to decide whether their contact person (responsible for liaising with labour authorities on substantive matters) will be in the host Member State or easily reachable from a distance.
- **Availability of contact person** – do not require a contact person to be available after posting.

- SMET members have been working with the responsible colleagues, enforcement authorities and different stakeholders, on how to implement the best practices.
- Progress on the best practices that have the highest potential to reduce administrative burden (Targeted approach or the Short-term exemption) has been limited. So far only 3 Member States have one or both of these practices in place and 10 Member States have expressed their readiness to consider them. Implementation of these practices would result in a substantial reduction of the administrative burden for service providers that need to make prior declarations. Furthermore, this would allow the authorities responsible for the inspections and controls to make best use of their limited capacities.
- Overall good progress has been made in implementing best practices related to number of documents and contact persons. As a result, service providers have to keep available fewer documents and have more freedom to appoint the contact person of their choice.
- To support the uptake of best practices and the use of a country-specific approach to implement them, the Commission held bilateral meetings with most of the Member States in 2003 and 2024. These bilateral meetings led to a better understanding and changes in the position of several Member States.
- In late 2024, Italy implemented the best practice giving service providers a reasonable timeline to submit documents if requested and removing the requirement to have a contact person physically present in the host Member State.
- In 2025, Malta implemented all best practices related to documents, including on the number of documents and when those documents need to be provided. Translation requirements have also been removed under a new notification process.
- Czechia also implemented the practice giving service providers a reasonable time to submit documents if requested.
- Estonia and Romania shared that they are preparing legislation to implement the Targeted approach and the Short-term exemption respectively. These are two of the most effective best practices from the businesses' perspective.
- The SMET project will be a basis for further discussions on how to address this important barrier.

Table 1: State of play of the selected best practices per Member State

	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
1. Targeted	Red	Red	Red	Red	Green	Red	Red	Yellow	Yellow	Red	Yellow	Red	Red	White	Yellow	Red	Red	Yellow	Red	Red	Yellow	Red	Yellow	Red	Red	Red	Red
2. Short-term	Red	Red	Red	Red	Green	Red	Red	Yellow	Yellow	Green	Yellow	Red	Red	White	Yellow	Red	Green	Red	Red	Red	Yellow	Red	Yellow	Red	Red	Yellow	Red
3. Grace	Red	Red	Red	Red	Green	Green	Red	Yellow	Yellow	Green	Green	Red	Red	White	Green	Red	Green	Yellow	Red	Red	Green	Yellow	Red	Red	Yellow	Green	Red
4. Documents	Red	Red	Green	Green	Green	Yellow	Green	Green	Red	Red	Green	Red	Red	White	Red	Red	Green	Yellow	Red	Green	Red	Green	Green	Red	Green	Red	Green
5. Provide	Red	Green	Red	Green	Green	Yellow	Green	Green	Yellow	Red	Green	Yellow	Red	White	Green	Green	Red	Yellow	Green	Green	Red	Red	Yellow	Green	Green	Yellow	Red
6. Translations	Green	Red	Red	Green	Yellow	Red	Green	Green	Green	Red	Green	Yellow	Green	White	Green	Red	Green	Red	Red	Green	Yellow	Green	Yellow	Red	Green	Green	Red
7. Presence	Green	Green	Green	Green	Green	Yellow	Yellow	Green	Yellow	Green	Green	Red	Red	White	Green	Green	Green	Yellow	Yellow	Green	Red	Red	Green	Yellow	Red	Green	Red
8. Availability	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	White	Green	Red	Red	Yellow	Green	Green	Green	Green	Green	Green	Red	Green	Green

Suggested best practice will be further discussed
  Administrative requirements were already in line
  Suggested best practice will not be considered

Source: Member States input in SMET work

## 2.3. Improving the authorisation process for placing biosolutions (biopesticides) on the market

### Background

Biopesticides are plant protection products based on biologicals, such as micro-organisms, instead of chemical substances<sup>6</sup>. After receiving approval at EU-level for the active substance/s, a biopesticide must obtain authorisation at national level before it can be placed on the market. These procedures often take a long time, sometimes more than 8 years. Furthermore, if the company wants to sell its plant protection product in another Member States, a mutual recognition procedure should take place. Complexity and length of the process for placing a biopesticide on the market often leads to innovative EU companies launching their new products in other markets (e.g. in the US), where a fast-track process for authorising biopesticides is applied.

There are several reasons for the lengthy authorisation process. The process and the authorities responsible for authorisation of biopesticides are often the same as for chemical pesticides. However, the expertise needed to assess such products is different. In many Member States, there is not enough experts qualified to assess biopesticides (such as microbiologists, biologists, ecologists, etc.).

Furthermore, sometimes companies cannot receive advice on how to prepare the full dossier before submitting it and the costs for preparing the biopesticide application dossier can be high. Compliance and processing costs related to approval are particularly harmful for start-ups and smaller companies, thus also constituting a barrier to innovation.

For the national authorisation of pesticides, the EU is divided into three zones: Northern, Central and Southern. Through mutual recognition, EU Member States can authorise pesticides assessed by another country (zonal Rapporteur Member State) in their zone. Currently, the possibilities offered by mutual recognition are not fully exploited by many Member States.

### Objectives

To accelerate access to the market for biopesticides, helping innovative European companies to develop and grow in the EU and supporting more sustainable agricultural production.

### Deliverables

- SMET members agreed to explore the possibility of implementing the following good practices and solutions:

- Introducing a **specific procedure** for authorising biopesticides.
- Establishing **dedicated teams** for the assessment of biopesticides, with the necessary qualification and specialised training.
- Offering **pre-submission advice** for applicant companies.
- **Mutual recognition** for biopesticides that have already been authorised in another Member State (from the same zone) within the 120 days set by the legislation.
- **Forecasting farmers' needs** for biopesticides based on the crops grown in the country.
- **Faster approval/mutual recognition** of biopesticides for agricultural needs.

- The updated reporting on the implementation of these practices can be seen in the table below.
- It shows that while some of the practices are broadly applied, for example participation in the training modules organised by the Commission and offering pre-submission advice, the uptake of others is much slower – introduction of dedicated team and procedure.
- Mutual recognition within the deadline set in the legislation also appears a challenge. Only 5 Member States report that they manage to mutually recognise biopesticides already approved in other Member States within the 120 days.
- The slow uptake of some practices showed the need to take further actions at EU level. As part of the Simplification Omnibus, the Commission proposed legislative amendments designed to accelerate the placement of biopesticides on the market. Some of the proposals were partially inspired by the collaborative work in SMET.
- As a next step, the project will be assessed in view of the recent simplification proposals, and the future directions will be discussed.

Table 2: State of play of the implementation of selected solutions/practices



Source: Member States input in SMET work

## 2.4. Facilitating the opening of bank accounts (the workstream for individuals closed)

### Background

Access to bank accounts is essential for individuals and businesses to fully capitalise on the opportunities offered by the Single Market. The Payment Accounts Directive gives individuals in the EU the right to open a basic payment account and protects them from discrimination based on factors like nationality or place of residence. However, some difficulties still exist when consumers are trying to open a bank account, especially when they want to open an account across borders in another Member State.

Unlike consumers, businesses lack an EU-wide entitlement to a basic payment account, as the Payment Accounts Directive applies solely to individuals. This presents particular difficulties for SMEs seeking to operate or expand across borders. Having the ability to open a bank account in another EU country would streamline the process for businesses to manage transactions such as payments of tax and salaries.

Due to the differences in the challenges and the proposed solutions, the project was divided into two workstreams.

### 2.4.1. Facilitating the opening of bank accounts for individuals (closed)

#### Objectives

To make it easier for people from one Member States to open a bank account in another Member State.

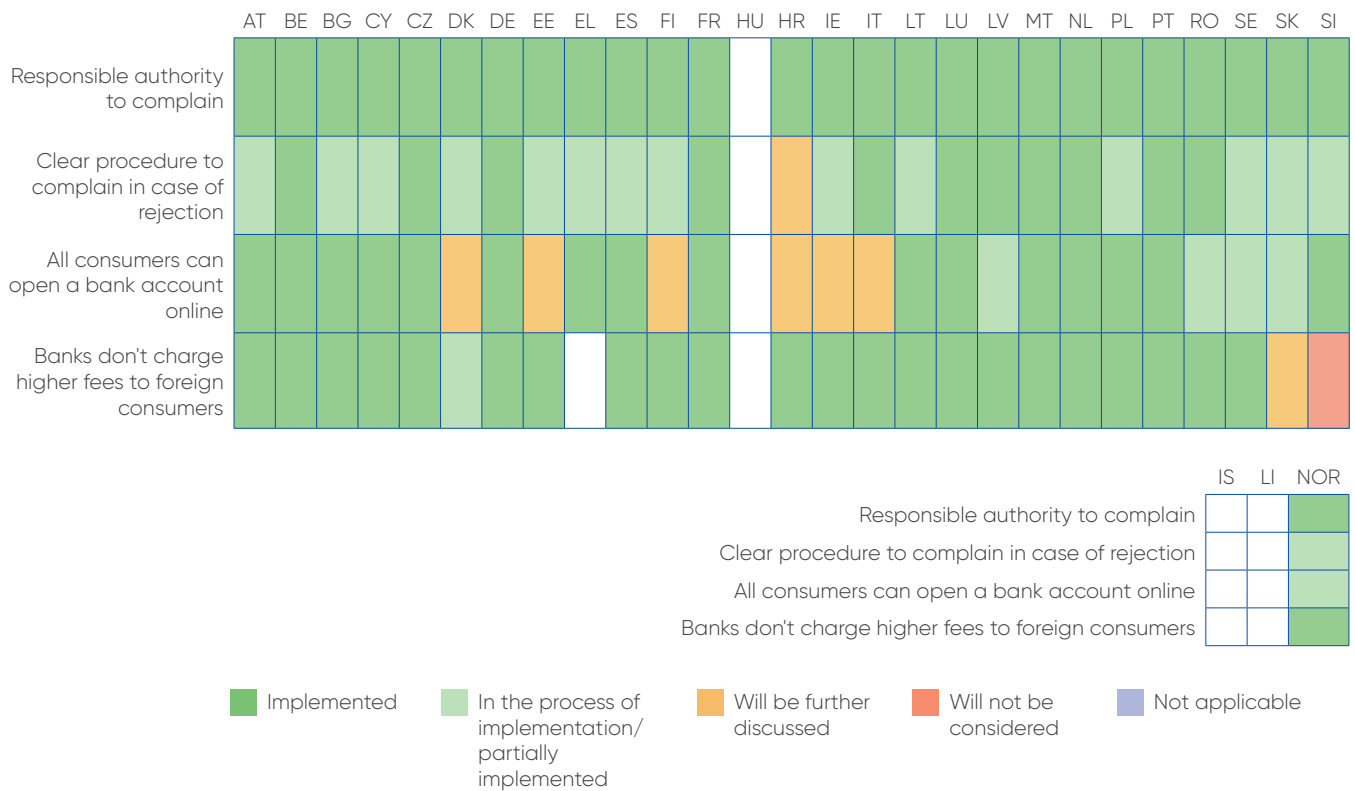
#### Deliverables

- In 2024 SMET Members agreed to launch a project on facilitating the opening of bank accounts.
- For the workstream on individuals, SMET agreed to work on ensuring the availability of four best practices:

- **Authorities responsible** for handling rejections /complaints
- **Clear procedures** for the applicant to follow in if their request to open a basic bank account is rejected
- **Non-discriminatory practices** providing possibility also for cross-border consumers to open bank accounts **online**
- **Non-discriminatory practices** applied to **fees**

- The workstream was largely successful with a great majority of Member States having in place, at least partially, most of the suggested best practises. Currently around 90% of the practices are fully implemented or in the process of being introduced.
- As of June 2025, it was decided to close the workstream.
- The Commission continues to engage in bilateral discussions with Member States to verify the reported implementation status of the practices and further support their full uptake.

Table 3: State of play of the selected solutions/practices for opening bank accounts for individuals



Source: Member States input in SMET wiki <sup>7</sup>.

## 2.4.1. Facilitating the opening of bank accounts for businesses (ongoing)

### Objectives

To make it easier for businesses to open a bank account in another Member State.

### Deliverables

- The workstream on facilitating the opening of bank accounts for businesses was launched simultaneously with the one for individuals in 2024.
- SMET agreed to work on introducing the five best practices, aiming to make it easier for European businesses or investors to open a bank account in a Member State different than their headquarter or residence.

- Cases where national law grants **businesses a right to a (basic) payment account**
- **Clear information** on the conditions for opening a bank account
- **Detailed justification** provided along with rejections
- **Simplified assessment of applications** made by companies/NGOs established in the EU
- Situations where national legislation established requirements **to prove the customer's connection** with the respective Member State.

<sup>7</sup> State of play may be modified based on the bilateral discussions with Member States that are ongoing.

- In 2025, sherpas continued working internally with the relevant national authorities for the implementation of the best practices.
- The results show overall slow uptake of the practices. Since the beginning of 2025, only 9 Member States reported positive change <sup>8</sup>.
- SMET members faced challenges in promoting the implementation of the best practices, including due to the lack of data at EU level and in most of the Member States.
- There is no clear agreement from most of the national authorities on the need to implement the selected practices, with some Member States preferring EU-level legislative actions.
- During its June meeting, SMET decided to continue working on the workstream, yet no concrete steps forward have been proposed.

Table 4: State of play of the selected solutions/practices for opening bank account for businesses



Source: Member States input in SMET work

- Exchanges with the responsible national authorities and the Commission on the possible way ahead are ongoing.

<sup>8</sup> BG, CZ, EE, HR, IT, LT, NL, PT, SK

## 3. Strategic discussions

### 3.1. Strengthening SMET

Over the past year, SMET initiated several discussions to explore Member States' perspectives on enhancing SMET's results. The March 2025 meeting in Krakow featured strategic dialogue aimed at collecting and summarising concrete proposals for the strengthening of SMET. These proposals seek to build upon and strengthen the distinctive working methods that have contributed to SMET's success and have subsequently been integrated into the Single Market Strategy.

Engagement from stakeholders at both EU and national levels was highlighted as vital in addressing barriers faced by business communities. SMET's user-based approach prioritises tackling barriers from the perspective of those affected—citizens, workers, and businesses—making stakeholder involvement at all stages essential.

The collection of data and evidence at EU, national, and regional levels remains a challenge in shaping SMET's priorities and designing pertinent projects. Given the difficulties in securing objective data and the constraints of time and resources, ideas were sought for practical strategies to gather necessary information without excessive burden, prioritising the effective removal of real-world barriers.

Addressing areas where SMET projects have fallen short was also emphasised. SMET members expressed concern about the engagement levels of some Member States in tackling critical barriers. It is crucial for responsible services and authorities to analyse proposals and take appropriate action to eliminate persistent barriers, with Commission follow-up deemed essential. Finally, improving visibility and securing political support for SMET's findings within the Competitiveness Council was recognised as essential.

### 3.2. The Single Market Strategy 2025

SMET members broadly welcomed the Single Market Strategy 2025, viewing it as a long-awaited shift towards a more solution-focused and politically grounded approach to addressing barriers within the Single Market. The Strategy's emphasis on tackling concrete problems was strongly endorsed, along with the role of SMET in implementing this ambitious agenda. However, it was widely acknowledged that SMET must be strengthened to ensure tangible change is driven on the ground.

There was broad agreement on the necessity for strong political backing to effectively eliminate barriers to cross-border activities. To tackle this challenge, the Single Market Strategy proposed High-level political SMET meetings and the introduction of Single Market Sherpas.

It was acknowledged that further efforts are necessary in addressing unsuccessful SMET projects, and the way proposed by the Strategy was considered to be a relevant solution. SMET members emphasized the need for structured and transparent monitoring of SMET projects, including a thorough analysis of less successful cases. They advocated for effective follow-up on unresolved barriers, including through discussions at the Competitiveness Council and the application of enforcement tools, where appropriate. A practical approach that avoids bureaucracy was prioritised.

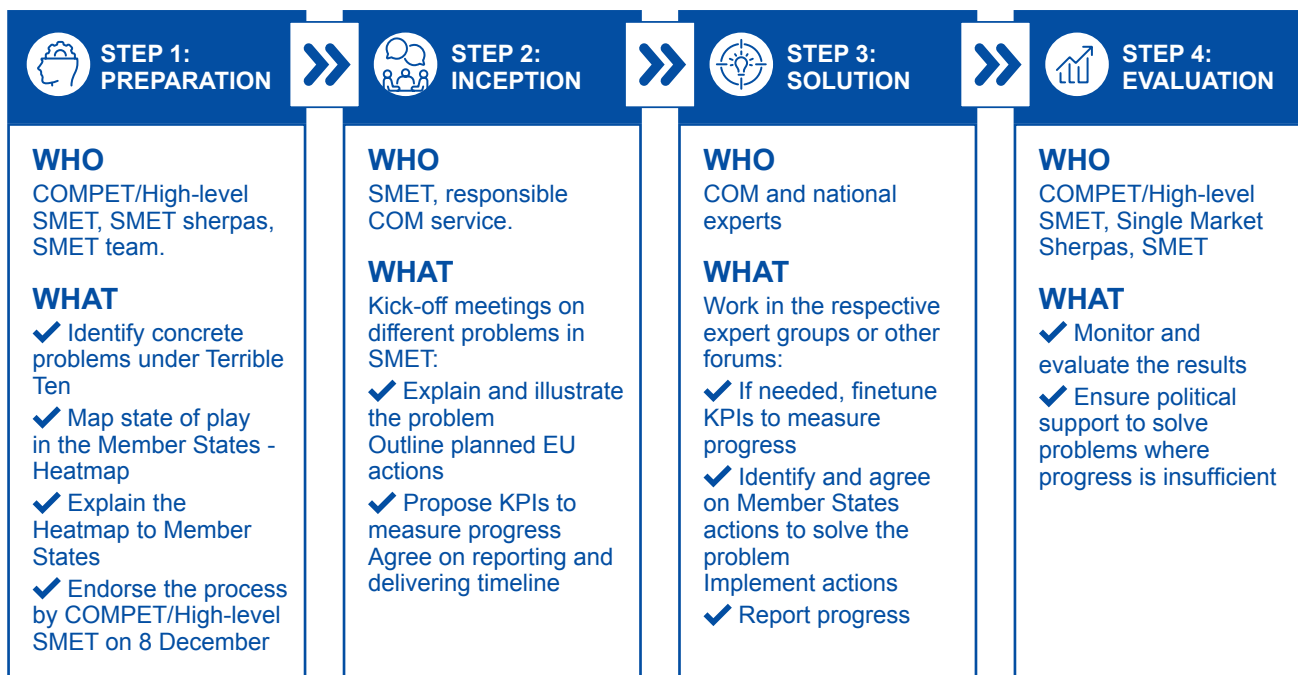
### 3.3. Terrible Ten

SMET has significantly engaged in discussions about the most pressing Single Market barriers for businesses. The outcomes of these discussions informed the Single Market Strategy and laid the groundwork for what is known as the “Terrible Ten” barriers. The rationale was to prioritise obstacles by focusing first on those frequently highlighted by companies and workers as impediments to their cross-border activities.

The “Terrible Ten” barriers identified in the Strategy were welcomed by SMET as a positive, practical step that supports its well-founded approach. To address them effectively, each “Terrible Ten” barrier was broken down into specific problems experienced by companies on the ground. A priority list of such problems was established, and consulted with stakeholders and SMET to ensure that, while not exhaustive, it captures the most significant issues to address initially.

To initiate a more detailed debate among Member States on future steps, the European Commission prepared an initial overview of the performance of each country on the specific issues. The overview is based on various available indicators and preliminary stakeholder’s input. Bilateral meetings with most of the SMET members were held to start discussions early on and clarify the methodology and the way forward. Further work on specific solutions and on how to deliver progress will take place in dedicated policy forums such as working and expert groups with a support of SMET. SMET will launch the discussions on individual issues and ensure overall progress. Therefore, SMET will also seek political support in instances where technical-level progress would be insufficient.

#### Addressing the “Terrible Ten” process



At the Competitiveness Council meeting on 8 December 2025, ministers exchanged views on the removal of internal market barriers, focusing on the “Terrible Ten”. This part of the discussion was also branded as a high-level political SMET meeting, fulfilling the commitment under the Single Market Strategy. The debate stressed the need for urgent and decisive actions to remove barriers to the Single Market while avoiding creating new ones. Member States highlighted the importance of SMET and confirmed the Competitiveness Council as the right venue for further discussions, while emphasising the need to involve other relevant Council formations, as well as the need for prioritisation, implementation and reporting.

## 4. Future direction

SMET role in pursuing action to remove barriers in the Single market continues to be critical. The innovative SMET approach to tackling Single Market barriers already inspired several policy initiatives. SMET will continue driving practical solutions to specific problems faced by businesses and citizens. The involvement of stakeholders, both at national and EU level, is critical and will be expanded further to ensure that SMET remains on the right path.

Furthermore, SMET will play a crucial role in addressing the “Terrible Ten” barriers. It will establish the groundwork for actions related to identified issues, beginning with a kick-off meetings. During these meetings, stakeholders will outline the challenges they face, while the SMET will work closely with the responsible Commission services and national experts to address the identified problems. SMET will support progress on each problem and prepare political discussions to seek political level engagement in addressing potential impasses and to steer the process.

The role of SMET will be twofold – to ensure that the correct actions for addressing the specific problems are implemented both at EU and national level and to complement some of these actions with concrete project.

SMET will also continue its work on identifying and removing other pressing barriers to the Single Market, beyond the scope of the “Terrible Ten.” Efforts on ongoing projects will continue. The flagship initiative on facilitating the cross-border provision of services will be reinforced as the barrier is now one of the “Terrible Ten”.

Strong political support for improving the Single Market highlights the need for intensified efforts to bolster its functioning and can serve as impetus to strengthen SMET’s role in the coming years. Focused discussions in the Competitiveness Council, prepared by SMET, could play a significant role in raising political awareness of Single Market barriers and promoting the swift implementation of practical solutions.

# Annex 1: Overview of the SMET meetings

