



Single market strategy 2025

– Call for evidence

January 2025

Societal challenges, including the climate, energy and market design, require the Single Market to be futureproof and built for resilience. Over the next 15 years, the rules of the Single Market will need to adapt to respond to the urgency of mitigating climate change and keeping the use of natural resources within planetary boundaries. To make this happen, sustainable products and circular business models need become the norm, underpinned by a set of powerful tools: ambitious requirements, robust technical standards inclusive of civil society organisations, and enhanced compliance.

Product policy. The core regulatory framework in charge of driving circularity in the EU at a large scale in the next decades is the Ecodesign for Sustainable Products Regulation (ESPR). It has the potential to drive sustainability along global value chains and create positive ripple-down effects on global markets. Applying and enforcing ambitious ecodesign requirements on high-impact products/most polluting products placed on the EU market can bring substantial environmental benefits.

Robust standards for a green transition. To secure lead markets with the upcoming Clean Industrial Deal, market mechanisms such as the technical standards for measuring and comparing sustainability of products and commodities, need to be consistent with climate and environmental goals and commitments to ensure market access of new innovations and technologies. The success of the new legal requirements will highly depend on technical specifications, including harmonised standards. We need ambitious, clear and forward-looking requirements securing the primacy of mandatory legislation, combined with robust supporting definitions, test methods and assessment methodologies. Such voluntary harmonisation of infrastructure, reverse logistics and circular systems will enable companies to create economies of scale in the long run.

- Addressing the long-standing issue of product standards hampering the placement and scaling of innovation on the Single Market (e.g. cement and concrete) is also key. With the standards supporting key policies such as the ESPR and the Critical Raw Materials Act, the EU has an opportunity to act as the leading setter of standards in the international arena. In cases where existing international standards fall short in matching the European environmental ambition, the EU should push the global agenda with European standards. Since harmonised standards serve the broader public interest, it is important that the standardisation process ensures transparency and openness and reflects multiple societal interests.

Countering non-compliance through effective market surveillance. Insufficient control of non-compliant products distorts competition and reduces incentives to comply, jeopardising confidence in legislation and posing risks to health and the environment. Effective market surveillance should be ensured through targeted measures to guarantee the full delivery of the expected economic and environmental benefits in legislation. Online marketplaces should be fully recognised as economic operators and should proactively recognise and prevent illegal practices and non-compliance, including being responsible and accountable for checks on the Extended Producer Responsibility (EPR) and ecodesign minimum requirements compliance of their partners. Existing and future product information systems such as the EPREL database, ICSMS and digital product passports (DPP) should be built to facilitate effective verification of compliance. In addition, options such as the application of fast screening methods to detect products most likely not to comply should be explored, as well as the adoption of effectively dissuasive measures to improve compliance, together with the allocation of sufficient resources to market surveillance and customs authorities' and their cooperation.

Additional ECOS references:

- 30 years of the European Single Market – “[Towards a Single Market that works for the environment through ambitious product 29 policy and standards](#)”. 2022.
- Ecodesign: The EU's journey to sustainable products begins now. [ECOS ESPR resource hub](#). 2022-2024.
- Clean Industrial Deal, ECOS recommendations. [Our vision: a truly sustainable Clean Industrial Deal](#). 2024.
- Market surveillance. “[Joint Statement level playing field for online marketplaces and effective enforcement](#)” 2024
- “[Ecodesign as part of circular economy - Implications for market surveillance](#)” 2018.