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COVER NOTE

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Delegations will find attached document SEC(2025) 195 final.



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REGULATORY SCRUTINY BOARD OPINION

Mid-term evaluation of the Single Market Programme

{SWD(2025) 172 final}



EUROPEAN COMMISSION
Regulatory Scrutiny Board

Brussels,
Arcs(2024)

Opinion

Title: Mid-term evaluation of the Single Market Programme

Overall opinion: NEGATIVE

(A) Policy context

The Single Market Programme (SMP) consolidated a range of existing EU funding programmes to help achieve the single market's full potential and ensure Europe's long-term recovery from the COVID-19 pandemic.

The SMP has a budget of EUR 4.3 billion for 2021-2027. It includes actions around six pillars in the areas of (i) enforcement and market surveillance, (ii) small- and medium-sized enterprises (SMEs), (iii) standardisation, (iv) consumer protection, (v) food safety, and (vi) statistics. The mid-term evaluation covers the period 2021-2023.

(B) Key issues

The Board notes the additional information provided and commitments to make changes to the report. However, the Board gives a negative opinion because the report contains the following shortcomings:

- (1) The report is not sufficiently informative and self-standing. It does not provide a comprehensive assessment of the overall programme's performance.
- (2) The evaluation is not clear enough about the limitations of the current monitoring system and evaluation arrangement and how the achievement of some specific objectives can be measured.
- (3) The analysis of relevance, coherence and EU added value is not adequately developed. The conclusions and lessons learned in the report are not supported by sufficient evidence.

(C) What to improve

- (1) The main report should be more informative and self-standing. To this end, the key analysis and evidence provided in the pillar-specific annexes should be better reflected in the main body of the report to allow for an assessment of the overall programme's performance. The report should set out a clear intervention logic and the links between the overarching

This opinion concerns a draft evaluation/fitness check which may differ from the final version.

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objectives and the pillar-specific objectives should be clearly established for the purpose of the evaluation.

(2) The key elements of the pillar-specific analyses should be systematically summarised in the main report and presented in a manner that reflects the evidence, its limitations positive and negative findings etc. The extent to which perception data is sufficient and could be subject to possible biases and other limitations, including lack of representativeness needs to be taken into account.

(3) The evaluation should set out upfront the limitations of the current monitoring system. It should explain what those limitations are and how they were addressed in the analysis. The report should be clear on the lessons learned from the mid-term evaluation that can be drawn for the final evaluation in this regard. It should present which indicators are used in the analysis and for which areas indicators are missing. It should also identify more clearly which SMART objectives are considered for the assessment of the programme's performance and the links between them and the specific objectives at pillar level. As far as possible, the report should identify gaps in the current monitoring system that may hamper an evaluation in the future. In particular, the need to attribute benefits to the actions under the programme should be reflected.

(4) Estimates of benefits should not be presented as evidence of the effectiveness of the programme if they are based on ex ante modelling. As the evaluation should assesses the actual benefits, an approach based on ex-ante modelling is conceptually misplaced, and the estimates should not be used in the effectiveness and efficiency analyses. As the mid-term evaluation focuses on outputs, and to a limited extent results, as it is too early to observe the impacts of the intervention, this should be more clearly acknowledged when drawing assessments and conclusions about the effectiveness and efficiency of the programme. The overview table of costs and benefits should provide adequate information on benefits and costs. Once the effectiveness and efficiency analyses are improved, the cost benefit table should be extensively amended to provide estimates of all relevant costs and benefits in, a transparent, structured, and comparable format.

(5) The analysis of relevance should be further strengthened. It should explore whether the programme is still relevant for problems linked with the COVID crisis, whether it is suitable to address emerging problems and needs, and how they affect the prioritisation among actions. The report should consider whether the limited complementarity across pillars and actions may reflect lack of synergies. It should assess the external coherence between the programme and other initiatives or national programmes contributing to the same general objectives.

(6) The report should strengthen the EU added value section. It should provide evidence to substantiate the claim that the programme has generated EU added value beyond what interventions at national level could have achieved. In particular, it should better explain and provide evidence on EU added value related to the capacity of the programme to achieve economies of scale and allow certain activities that could not be ensured by interventions at national level to take place.

(7) The analysis in the main report should take into account the differences in the analysis across pillars, including data availability, monitoring systems and methodologies used. Such variability across pillars should be reflected in more nuanced conclusions and lessons learned.

(8) The conclusions should omit statements if they are not underpinned by the analysis and the evidence provided in the main report. It should make conclusions drawn on the basis of only partial evidence more nuanced reflecting that they rely mainly on output data and to some extent result indicators or perception data. The report should explain better how the conclusions at programme level were derived from the ones in the six pillar-specific evaluations. The main report should be more balanced and present both positive and negative findings.

Some more technical comments have been sent directly to the author Service.

(D) Conclusion

The lead Service must revise the report before launching the interservice consultation.

The lead Service may resubmit to the Board a revised version of this report.

Full title	Mid-term evaluation of the Single Market Programme
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