



Brussels, 19 November 2025
(OR. en)

15549/25

LIMITE

COMPET 1178
MI 917

NOTE

From: General Secretariat of the Council
To: Delegations

Subject: Single Market Strategy: The removal of Single Market Barriers (Terrible Tens)
- Presidency discussion note

Delegations will find attached a Presidency discussion note on “Single Market Strategy: The removal of Single Market Barriers (Terrible Tens)” with a view to the discussion by the Working Party on Competitiveness and Growth (Internal Market) at its meeting on 25 November 2025.

WP on Competitiveness and Growth (Internal Market) – 25 November 2025**Presidency discussion note*****Single Market Strategy - A new approach to the removal of Single Market Barriers***

The Single Market is Europe's home market - a powerful catalyst for growth, prosperity and solidarity. It remains one of the European Union's most significant achievements, delivering growth, stability, and economic integration. Yet over three decades after its creation, the Single Market remains unfinished and the full potential is still not realized, even though it is the main driver of European competitiveness.¹

Today, internal barriers still persist, limiting cross-border trade and investment, inhibiting both businesses and consumers from reaping the full benefits. According to an IMF analysis, existing barriers within the EU are equivalent to a 110% tariff on services and a 44% tariff on goods. These persistent barriers hinder productivity and limit competitiveness. For the last two decades intra-EU trade and integration of the Single Market has stagnated². In the context of shifting geopolitical realities and increasing international competition, it is now more urgent than ever to realize a truly integrated, fully functional Single Market - one that empowers our 450 million citizens and 26 million companies to innovate, scale up, and thrive.

In May, the European Commission presented its Single Market Strategy setting the course for finalizing and strengthening the Single Market. Therein they presented a new method for the removal of barriers in the Single Market. In the Strategy, the Commission highlights the need for joint and focused efforts to take down the 10 most harmful Single Market barriers named the '*Terrible Ten*'³:

1. Overly complex EU rules
2. Lack of Single Market ownership by Member States
3. Complicated business establishment and operations

¹ European Commission, Single Market Strategy, 21 May 2025.

² <https://www.imf.org/en/News/Articles/2024/12/15/sp121624-europes-choice-policies-for-growth-and-resilience>

³ European Commission, Single Market Strategy, 21 May 2025.

4. Recognition of professional qualifications
5. Long delays in standard-setting that weigh on innovation and competitiveness
6. Fragmented rules on packaging, labelling and waste
7. Outdated harmonised product rules and lack of product compliance
8. Restrictive and diverging national services regulation
9. Burdensome procedures for temporary posting of workers
10. Territorial supply constraints

Some on the Terrible Ten (TT) barriers require mainly EU-level action, such as TT.1 on overly complex EU rules, TT.5 on long delays in standard-setting that weigh on innovation and competitiveness, aspects of TT.7 on outdated harmonised product rules and lack of product compliance, and TT.10 on tackling territorial supply constraints. Other barriers require also action at Member State level.

Following this new barrier centric approach, the Commission has worked on breaking down the Terrible Ten into sub-barriers or specific problems. This was done in collaboration with business stakeholders and responsible Commission services. The list of problems is not exhaustive, but those 28 problems are confirmed by stakeholders as being among the most pressing challenges for their cross-border activities. In addition, the Commission has also started to map and discuss with Member States how these problems materialise at national level and their gravity. The output of this exercise is a colour coded overview, still under development, which includes the list of the problems and how Member States perform on each problem. This approach will help ensure targeted and systematic actions to effectively address the barriers. Success will be measured by the implementation of concrete action and the removal of the barrier.

In parallel, President von der Leyen announced in her State of the Union Speech on 10 September a new *Single Market Roadmap to 2028* - focusing on key areas such as capital, services, energy, telecoms, the 28th regime, and a fifth freedom for knowledge and innovation.⁴ This only emphasizes the need for ensuring a new *joint* commitment to complete all aspects of the Single Market within a reasonable timeframe.

⁴ State of the Union Address by President von der Leyen, 10 September 2025.

Structuring the work on barrier removal going forward

Effectively addressing these longstanding barriers requires renewed, collective political commitment and the adoption of effective tools. To launch the process the Commission created an initial heatmap, which aims at illustrating the sub-barriers or specific problems in the Member States. While still being finalized, this tool is a new and constructive approach that provides a valuable basis for targeted action in light of two decades of stagnation in the development of the Single Market. The purpose of the overview is not to single out Member States but to indicate which barriers are more prevalent and need to be addressed more urgently.

The Commission has now presented their suggestion on how we create new momentum and move the work forward. Real impact will require renewed commitment from both Member States and the Commission, a shared agenda, and structured, results-oriented follow-up. The Commission has presented their proposal on how this work should be structured and suggests that it should be anchored in the Single Market Enforcement Taskforce (SMET) which has also laid the foundation for the Terrible Ten.

The question on how to ensure commitment to removing barriers will be further discussed at the Competitiveness Council on 8 December. The Presidency believes it is fruitful to involve and engage the Council early to ensure the joint responsibility and political ownership on the removal of barriers. This is also in line with the Commission's calls for an annual SMET High-level meeting at ministerial level to address barriers and solutions. The Council will discuss how the work should be structured going forward and the need for renewed joint commitment from both the Commission and Member States.

The aim of the discussion in the Working Party is to connect the technical discussions, which have taken place in SMET, and the Council in order to align the work going forward. As a preparatory body of the Competitiveness Council, the members of the Working Party on Competitiveness and Growth (Internal Market) are invited to share their views on how we connect different levels in the work with this new approach and methods for barrier removal.

Against this background, Member States are asked to reflect on the following questions:

- 1. Based on the overview made by the Commission, what other specific steps can we take to strengthen the joint political ownership and commitment - both within Member States and at EU level?*
 - 2. Among the sub-barriers presented in the overview, which ones do you consider the most pressing ones to address and offer the greatest potential for early progress?*
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