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February 2024

REPORT

The Single Market

– a *gateway* to diversification and resilience

How simplified and streamlined policies can help unlock the potential of the Single Market, especially for innovative Irish small and medium-sized enterprises (SMEs) to diversify their exports and gain global competitiveness

This report, *The Single Market – a gateway to diversification and resilience*, published in February 2024, lists **11 specific and impactful policy initiatives** to strengthen the effective functioning of the Single Market.

In combination, the 11 recommendations provide a roadmap for a stronger and more united Single Market, leaving the detailed policy development and implementation to the responsible EU institutions.

Based on a survey, interviews and a detailed literature review, this report gives a voice to Irish SMEs on the challenges they experience when doing business in the Single Market and the policy solutions that would help them use the Single Markets as a platform for achieving scale and enhancing their competitiveness at a global level.

The overall work was commissioned by Amazon and conducted by Implement Consulting Group as an independent assessment of how further integration of the European Single Market can support economic growth and resilience in Ireland.

The work is supported by an advisory group composed of representatives from Ibec and Amazon. As part of the study, a survey was conducted among members of Ibec and a broader group of Irish SMEs, and the survey results represent the perspectives of Irish SMEs doing business in the Single Market.

Executive summary

On its 30th anniversary, the Single Market is still seen as the engine of the EU's society and economy. Further reduction of barriers to integration, particularly a renewed focus on enforcing existing Single Market rules and removing Member State-level barriers, is essential for the Single Market to remain the key driver of the EU's competitiveness.[1] EU leaders therefore marked the conclusion of the Swedish Presidency with a call for an independent High-Level Report on the future of the Single Market.[2]

This report brings forward the **call for action from Irish SMEs** who point to the need for continued efforts to simplify and streamline EU policies to fully unlock the potential of the Single Market. Based on a survey of 203 Irish SMEs, interviews and a detailed literature review, this report gives an Irish perspective on what Irish SMEs need, and how an ambitious reboot of the Single Market can help them scale up, diversify exports, and to compete globally. Key conclusions are:

- **Potential for increasing and diversifying exports |** Among the SMEs that participated in the survey, 95% state that access to the Single Market is important to their business. On average, however, 55% of the exports from the SMEs that participated in this survey are destined for a close neighbour of Ireland – either Northern Ireland (28%) or Britain (27%), and only 23% are on average exported to another member of the Single Market. Irish SMEs often see the neighbouring countries as a natural first export destination. 46% of Irish SME exporters had either Northern Ireland (27%) or Britain (19%) as their first export destination, whereas only 34% had one of the other 26 members of the Single Market as their first export destination. Given the size of the Single Market in comparison to the neighbouring markets, there could be a potential for Irish SMEs to increase and diversify their exports through the Single Market.
- **Simplified and streamlined policies can unlock potential |** Differing regulatory requirements are cited as one of the most critical barriers for Irish SMEs to do more business in the Single Market. 86% of the SMEs assess that regulatory barriers increase their costs, 79% experience lower profits and 72% say that regulatory differences erode their competitiveness. Irish SMEs confirm that reducing red tape will increase intra-EU exports, make it easier to establish a local presence in other Single Market countries and reduce barriers to engaging in public procurement across borders in the Single Market. This will stimulate growth and job creation in Europe.
- **11 recommendations for an ambitious reboot of the Single Market |** The SME survey and business cases in this report confirm that the policy initiatives proposed by Swedish SMEs and described in the report *Reboot of the Single Market – How to support the growth of SMEs through a strong and united Single Market* will also help Irish SMEs do more business via the Single Market. The 11 specific and impactful policy initiatives to strengthen the effective functioning of the Single Market presented to the Swedish EU Presidency in November 2022 are therefore also highlighted in this report, and the relevance for Irish SMEs has been underlined by business cases.

Set a bold and ambitious vision for the Single Market

The integration of the Single Market from 1995 to 2015 has permanently increased Ireland's GDP per capita by 1.2%, created 22,000 jobs and increased citizens' purchasing power by EUR 450.[3] The establishment of the Single Market created a need to harmonise legislation and establish common standards to ensure that domestic and foreign firms are subject to the same requirements, fostering fair competition and a level playing field when doing business across borders in the Single Market. Securing the four freedoms of the Single Market warrants revisions to and updates of EU regulations to keep pace with technological developments, global conditions and key societal challenges.

To reinstate the Single Market at the centre of the EU policy agenda, we propose the adoption of an ambitious Single Market strategy to ensure that regulatory fragmentation does not unnecessarily limit trade and drive-up costs for SMEs, such as for Lough Ree Distillery and Abbeylands Furniture.

Lough Ree Distillery is a family-owned distillery business, specialising in the production of whiskey, gin and vodka. The company exports to over 10 countries within the European Union and finds that doing business on the European Single Market is overall quite seamless. Nonetheless, they face hurdles and inefficiencies along their business journey – e.g. related to the Excise Movement and Control System, as well as the various additional certifications required by some Member States related to the sales and marketing of their alcohol products.

Abbeylands Furniture is a small, Irish company specialising in soft furnishings and art since 1959. They supply to independent stores and leading multi retailers across Ireland, the UK and Europe. The company sees a lot of value in the Single Market, which has enabled the company to expand sales and grow. Nonetheless, they report a lack of common EU standards for the furniture industry in the EU as well as difficulty in finding information relating to standards, creating "grey zones" in interpretation and compliance.

We also urge the European Commission to take specific steps to ensure that existing EU regulations do not place unnecessary burdens on SMEs. Improved access to information, for example by making SMEs aware of the opportunities offered by SOLVIT – the network of national administrations under the auspices of the European Commission working to offer a faster, informal alternative to starting a court case, submitting a formal complaint to the Commission or launching a petition. Encouraging the SOLVIT-centres to act proactively on structural cases and increasing awareness around SOLVIT can help SMEs, such as Heat Designs, when they encounter problems doing business in the Single Market.

Heat Design is an Irish company, primarily selling stoves and electrical products. Approximately 85% of the company's sales come from Ireland, followed by the UK, while a small share comes from the EU. Breaking into the European market has been a significant hurdle for Heat Design. The company also faces challenges navigating different legal practices and the settling of potential disputes in contract agreements, when each EU country has its own legal and administrative traditions. Finding this information and staying up to date on any changes is time-consuming and costly. A strong and proactive SOLVIT network could help SMEs, such as Heat Design, in having a singular point of up-to-date, comprehensive information on national requirements, laws and legal practices.

Another way to reduce burdens is to implement a data flow test that would give businesses the possibility to challenge data protection decisions that are perceived as disproportionate.

1.	Adopt an ambitious Single Market Strategy	Adopt a Single Market Strategy that clearly reinstates the Single Market at the forefront of the EU's integration project, green transition and innovation agenda. The Strategy should take a holistic approach to the full business and consumer journey as well as to integrate regulation across all pillars of the Single Market.
2.	Strengthen SOLVIT by establishing a Single Market Ombudsman in every EU Member State and commit SOLVIT to act more proactively on structural cases and to raise awareness	Designate a Single Market Ombudsman (head of or in collaboration with SOLVIT) in each Member State as a national, independent body with access to effective remedies. A network of Single Market Ombudsmen is to be set up under the auspices of the European Commission to safeguard a uniform interpretation of the EU rules in the Member States.
3.	Conduct a data flow test of all existing and new EU regulations	Implement a data flow test that acknowledges the supremacy of the principle of data protection in the EU but limits the risk of creating unjustified burdens when applying data protection rules. This gives businesses a possibility to legally challenge data protection decisions that are perceived as disproportionate.

Ensure compliance and simplify administrative procedures

EU directives can only achieve their intended effects if they are completely and correctly transposed into national legislation within the given deadline. Frictionless trade in the Single Market requires fewer, improved regulations as well as complete, correct, and immediate transposition into national legislation. Removing barriers that exist due to the incomplete implementation of EU rules across all Member States is foreseen to permanently increase Ireland's GDP per capita by 0.4%, and the increased production of goods and services can support 7,000 jobs.[4]

We propose that the Commission takes new initiatives to close the compliance gap of existing regulations and use the Better Regulation Toolbox (such as the SME test and think small first concept, the digital ready requirement and the "once only" concept in relations with public administration), to ensure that new EU regulations are designed in a way that is easy to implement and works for SMEs.

4.	Upgrade the European Semester to include recommendations on how to harmonise the implementation of EU regulations and close the compliance gap	Incentivise Member States to correctly apply and take political ownership for the correct application of EU rules by integrating recommendations on closing the compliance gap and harmonising implementation of EU regulation into the European Semester, governed by a mix of surveillance mechanisms and possible sanctions.

5. Strengthen the use of the Better Regulation Toolbox by integrating implementation in the design of new regulations and consistently respecting impact assessment requirements	Put more weight on integrating implementation into the design of new regulation and avoid deviations from the requirement to make impact assessments. Impact assessments are critical for avoiding new regulations that are ill-conceived and for ensuring that new regulations achieve the policy objective, with recognition of unintended consequences and/or trade-offs.

Remove regulatory trade barriers to create a green and circular Single Market

The Irish National Energy and Climate Plan (NECP) has committed to achieving a 7% annual average reduction in greenhouse gas emissions between 2021 and 2030. Among other actions, to do so, the NECP outlines a target of increasing energy generated from renewables from 30% to 70% by 2030. An increase of 8.2 GW is to be added to onshore wind capacity, while 1.5 GW of grid scale solar energy will be developed by 2030. Investment priorities of over EUR 21 billion have been laid out over the period 2018-2027, with more coming from other sources and covering the remaining years to 2030 (of which a significant share will be allocated to investments in renewables).[5] Barriers to trade in these and other climate technologies make the green transition more costly for countries such as Ireland and risk slowing it down.

With this study, we offer a roadmap that outlines an iterative approach to mapping and removing regulatory barriers to trade in climate goods and services within the Single Market. In terms of specific initiatives, we bring forward the request from Irish SMEs to design the digital European passport in a way that makes it easier for SMEs to become more circular and comply with new EU regulation.

6. Map and remove regulatory barriers to trade in climate goods and services within the Single Market	Map and remove regulatory barriers to trade in climate goods and services within the Single Market to accelerate decarbonisation by structuring market signals, incentivising innovation, and reducing the price of new technologies. Develop a roadmap for removing critical barriers and monitor its implementation.
7. Design the European Digital Product Passport in a way that makes it easier for businesses to become more circular	Introduce a well-designed Digital Product Passport based on stakeholder input, including SMEs. This will minimise the risk that administrative burdens and costs for businesses reduce the potential of the passport to support circularity and create a lack of cohesion within the Single Market.

Use digital tools to reduce costs and create conditions for growth

In the experience of Irish SMEs participating in the survey, the efficiency and effectiveness of EU legislation are often undermined by a high degree of complexity in its application in practice. Irish SMEs encourage the Commission to apply digital tools and solutions that lower the costs of collecting, updating and utilising information. A single VAT ID and an extended VAT one-stop-shop (OSS) can help companies, such as MyVolts, save time and money when it comes to VAT registration in other Member States.

Digital labelling, for example, can lower costs for an SME like Sliabh Liag Distillery. Also, the Commission should ensure that the advancement of new EU directives (particularly in the ESG field) will not create additional fragmentation in the coming years.

MyVolts is a small Irish company, specialising in replacement power supplies and music technology products. myVolts sells its products worldwide and stores the majority of its stock in the Netherlands, due to lower shipping and warehousing costs as well as shorter fulfilment times. In order to be able to offer their products in several big European markets, myVolts would need to add new dispatch warehouse locations and register for VAT in those locations. However, generating and filing VAT reports in each country in which they are registered generates extra costs and consumes time. Extending the VAT OSS to pan -EU inventory storage and onward sales would considerably reduce the need for multiple VAT registrations - decreasing costs and time burden associated with establishing warehouses in more countries.

Sliabh Liag distillery is a distillery business in Donegal, Ireland. The company specialises in whiskeys and gin, which they export to over 40 countries, including most of the EU, US, Canada, and South Africa. While present on the European Single Market, the company has experienced various challenges pertaining to unique national labelling requirements for alcoholic beverages – ranging from requirements related to health warnings, list of ingredients, recycling instructions and more. These requirements introduce additional costs and potential delays to sales.

8. Create a one-stop shop for the Extended Producer Responsibility (EPR) systems of Member States	Establish a truly harmonised approach to EPR; a centralised and up-to-date digital EPR one-stop-shop solution that would facilitate single EPR registration and reporting across all Member States at the product-level.
9. Create a single VAT ID and extend the VAT one-stop shop	Simplify VAT procedures by creating a single VAT ID in the EU and expanding the existing VAT one-stop-shop concept to cover all goods transactions (including pan-EU inventory placement and onward sales).
10. Recognise digital labelling as a true substitute for physical labelling	Provide manufacturers the option to choose whether to market their product digitally or physically – i.e., recognising digital labels as true substitutes for physical labels across product groups and Member States.
11. Create conditions for developing easy, fast, reliable and low-cost cross-border payment methods for both euro and non-euro payments	Create a more competitive framework for cross-border payments to ensure that EU citizens have access to a diverse range of providers, all of whom operate within an open, competitive setting, including traditional financial providers such as banks, fintech providers and platform operators.

1 Prosperity from the Single Market

BACKGROUND

In 1993 the Single Market was created to increase economic prosperity and peace in the EU by fostering the free flow of goods, services, capital and people among its members. Ireland was one of the initial 12 members of the Single Market.

The establishment of the Single Market created a need to harmonise legislation and establish common standards to ensure that domestic and foreign firms meet the same regulatory requirements, fostering fair competition and a level playing field when doing business in the Single Market.

The size of the Single Market makes the EU an attractive partner for negotiating trade agreements and gives its members leverage to push for a more sustainable future in global policy dialogues.

KEY FACTS AND FIGURES

The Single Market integration from 1995 to 2015 permanently increased Irish GDP per capita by 1.2%, created 22,000 jobs, and increased the citizen's purchasing power by EUR 450.

Standardisation and regulatory harmonisation benefit SMEs in particular, and 36% of Irish SMEs' total exports are destined for the Single Market.

The focus in this report is on the Single Market but it is highly important that the EU continues to leverage the Single Market in the external dimension as well, particularly to negotiate more EU trade agreements.

The Single Market opens up Europe to businesses and citizens

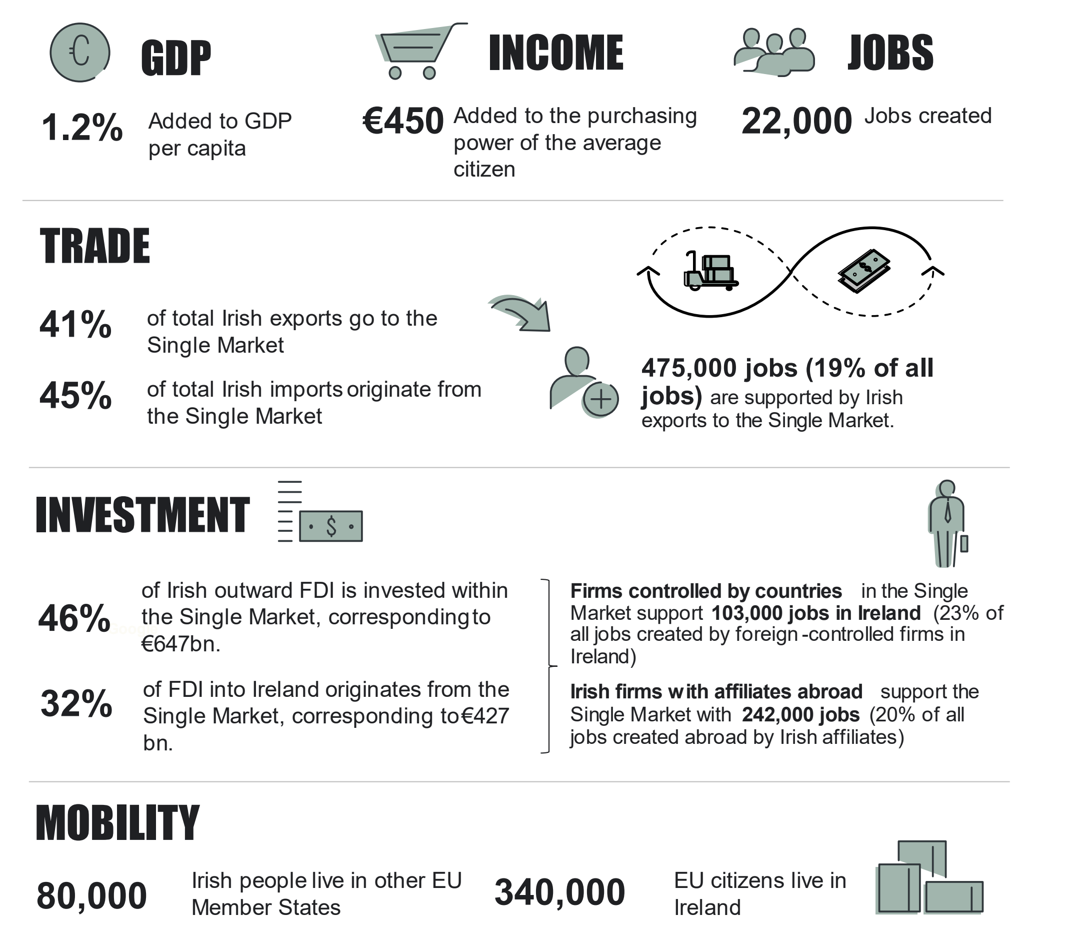
The Single Market is designed to enable goods, services, capital and people to move freely across countries by removing border regulation, custom duties and tariffs. It consists of the 27 EU Member States and the four EFTA Member States (Iceland, Liechtenstein, Norway and, to a certain extent, Switzerland). The Single Market is the world's largest trader in both goods and services[6], and its significance will grow if the ambitions of European Political Community to accept new member countries to the EU are realised.[7]

Access to the Single Market allows Irish firms to specialise and export goods and services in which they have a comparative advantage. Also, Irish consumers benefit from having access to a variety of goods and services imported at lower prices. The Single Market integration from 1995 up until 2015 has permanently increased Ireland's GDP per capita by 1.2%, compared to a situation without an increase in integration. Similarly, the Single Market integration has permanently created 22,000 jobs and increased an average citizen's purchasing power by EUR 450, see Figure 1.[8] If the continued integration since 2015 is also considered, the economic benefits are likely to be even larger. Today, almost every second job in Ireland depends on trade[9], and more than 19% of all jobs depend on trade within the Single Market.[10]

Today, more than 41% of Ireland's exports go through the Single Market, and 45% of Ireland's imports originate from the Single Market, underlining the Single Market's importance for many Irish firms, especially SMEs, where internationalisation is concerned.[11]

The free movement of capital has benefitted the Irish economy overall. Today, 32% of foreign direct investments (FDI) in Ireland originate from members of the Single Market, corresponding to a total stock of inward FDI of EUR 427 billion. Likewise, 46% of all Irish outward FDI is invested in members of the Single Market – this is significant considering the importance of the UK for Ireland, and that investments into the UK no longer count as intra-EU FDI after Brexit.[12] Similarly, the free movement of people has made it easier to live abroad, and 80,000 Irish people currently live in other Single Market countries, while 340,000 Single Market citizens live in Ireland.[13]

Figure 1: Irish workers and consumers benefit from the Single Market[14]



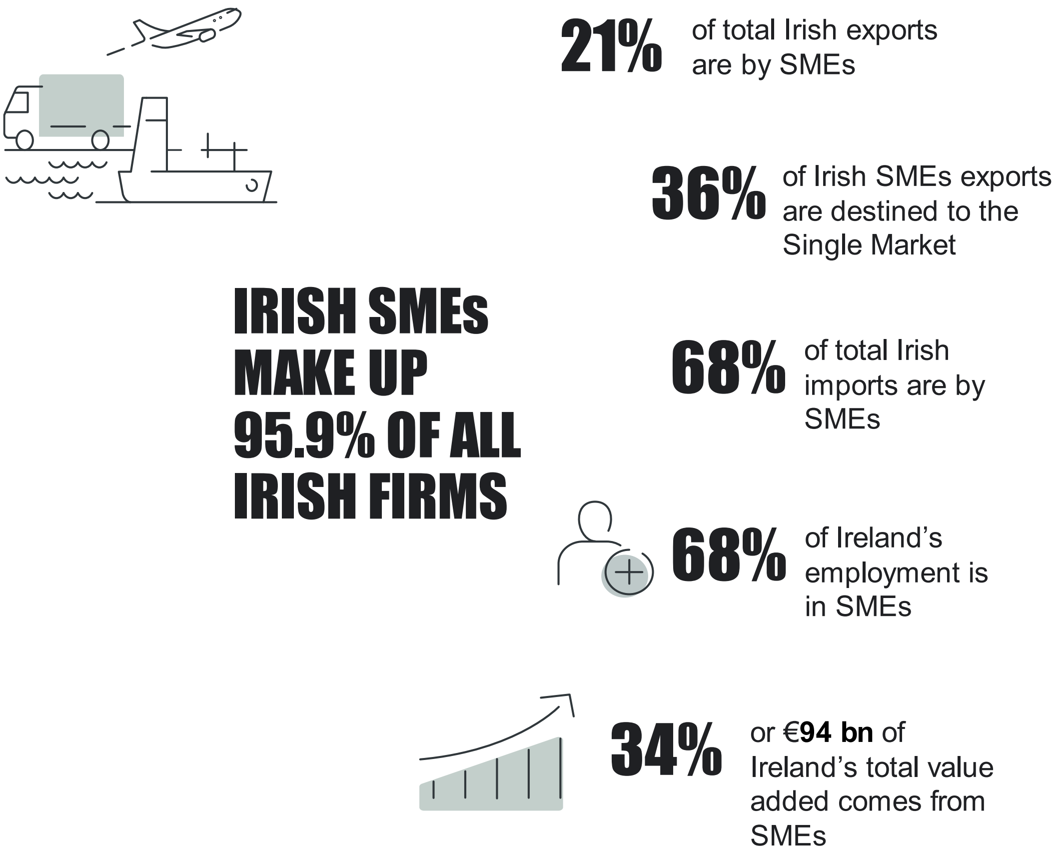
The Single Market is a platform for SMEs to scale up and mature

SMEs form the backbone of the Irish economy, accounting for 95.9%[15] of all firms and 34% of the country's GDP. These SMEs account for 68% of Ireland's private sector employment[16] and are key drivers of innovation, as they bring innovative solutions to global challenges like climate change.[17]

SMEs generally have fewer resources and capital available compared to larger enterprises, and regulatory burdens and administrative requirements are disproportionately difficult for them to endure. The costs associated with fragmented regulation and excessive administration are typically independent of the size of the cross-border activity, and SMEs tend to use a larger share of their resources to manage trade barriers.[18,19]

Standardisation and regulatory harmonisation are therefore particularly beneficial for SMEs that strive to scale up and enter new markets, access European value chains and strengthen their international competitiveness.[20] According to 2021 Eurostat data, SMEs account for 21% of total Irish exports, and 36% of the SMEs' total exports are destined for the Single Market.[21]

Figure 2: Irish SMEs gain from access to the Single Market



Note: SMEs are defined as enterprises with less than 250 employees.

The Single Market secures leverage and a global voice

The Single Market has not only stimulated prosperity for Ireland by facilitating more value-creating interactions between its member countries. The size of the Single Market makes the EU an attractive partner for negotiating trade agreements and gives its members leverage so they can push for a more sustainable future. Some examples are:

Manoeuvring through global health crises | Centralising the procurement of vaccines at the EU level gave Member States better bargaining power and access to vaccines on a larger scale, in the required time, with good delivery conditions and a diversified pool of suppliers.[22,23] In total, the EU secured up to 4.2 billion doses of vaccines for EU citizens.[24]

Giving economic power to EU sanctions | Sanctions are an essential tool of the EU's common foreign and security policy. The unifying rationale of most sanctions regimes is the attempt to alter, by economic pressure, the strategic choices of state and non-state actors. The size of the Single Market provides leverage in terms of the economic pressure imposed by EU sanctions, such as those on Russia.[25]

Securing market access and diversifying trade | The size of the Single Market makes the EU an attractive partner for business, and individual EU Member States would not have been able to make as many trade agreements on their own with as favourable conditions.[26] Irish firms have access to 45 trade agreements with 78 countries, including the EFTA-countries,[27,28] and no trading partner has more trade agreements than the EU.[29] These agreements have improved access to and lowered the prices of raw materials and intermediate inputs while also providing preferential access to key export markets.

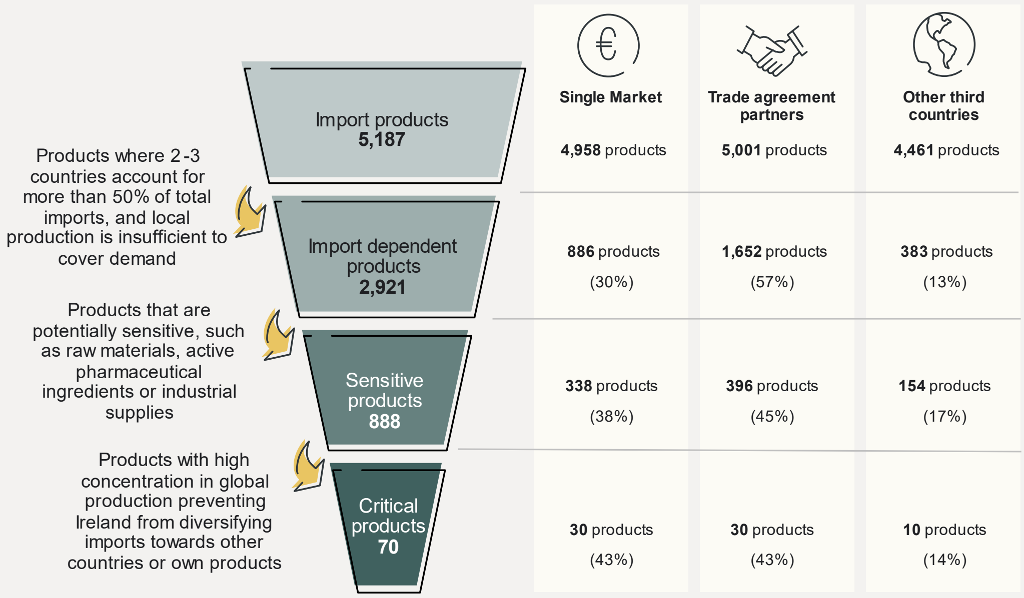
Setting global standards | The harmonisation of regulatory requirements and specifications of goods or services crossing borders within the Single Market have paved the way for a series of European standards. In a globalised world, shaping or ultimately setting the standards can provide a powerful first-mover advantage by minimising the adjustment costs for EU firms, which are then able to operate in export markets based on their home market rules.[30] Several European standards have been adopted at an international level, and modern EU trade agreements serve to boost the global adoption of EU standards to secure a level playing field between European firms and their third-country competitors.[31]

Balancing specialisation and resilience | The Single Market enables Member States to specialise and import what others can produce better, see Figure 3. Ireland currently imports 5,187 products. For 2,921 of these products, imports are concentrated from only 2-3 countries, and Ireland's production and economy is dependent on having access to and good political relations with these countries. The large bulk of these products are imported from partners where trade takes place under regulated terms (886 products are imported within the Single Market and 1,652 from trade agreement partners). The remaining 383 products are imported from third countries, and negotiating trade agreements with these countries can help Irish firms diversify their imports even more and build more resilient global supply chains.

Figure 3: The Single Market has enabled specialisation and helped build resilience[32]

Ireland imports a total of 5,187 products. Based on a methodology developed by the European Commission, we have assessed the import dependency of Ireland based on three different definitions of import dependency:

- **Import dependent products** | For products in this group, imports origin from 2-3 countries, and local production in Ireland is insufficient to cover total demand. The high concentration of imports can expose Irish importers to disruptions in supply from the trading partner (e.g., due to logistic challenges and production lockdowns) and to geopolitical tensions around the trading partner.
- **Sensitive import dependent products** | This sub-group of import dependent products contains products that are particularly important to the well-being of Irish citizens (e.g., pharmaceutical ingredients) or for maintaining production (e.g., raw materials and intermediate goods). The sensitivity of these products adds to the exposure of the Irish economy to secure access to these products.
- **Critical import dependent products** | This sub-group of sensitive import dependent products contains products that are highly concentrated in global supply (global supply is concentrated in 2-3 countries). This means that Ireland shares its import dependency with all other countries. In case of supply interruptions, Ireland (as well as all other countries) have very limited opportunities to redirect imports to other locations.



Source: Implement Economics based on the BACI (Base pour l'Analyse du Commerce International) dataset.
Note: The BACI dataset consists of bilateral trade flows at the product level in 2019. Products correspond to the harmonised system nomenclature (6-digit code).

2 SMEs call for simpler regulation and increased digitalisation

BACKGROUND

Initiatives to standardise and harmonise regulation across members have come a long way to dismantle obstacles to doing business within the Single Market, but significant regulatory barriers still exist.

In collaboration with Ibec, we have conducted a survey among Irish SMEs to identify key barriers and possible initiatives that will make it easier for SMEs to conduct business in the Single Market.

This report focuses on regulatory barriers that prevent Irish SMEs from reaching their full potential for increasing and diversifying exports by trading goods and services across borders in the Single Market.

We encourage future EU presidencies and institutions to continue having focus on dismantling regulatory barriers, also within public procurements and recruitment that are not covered by this study.

KEY FINDINGS FROM SURVEY

95% of the SMEs say that they have benefitted from the Single Market, mainly through exports to and sourcing from other firms.

72% of the SMEs say that differing regulation across member state to a great or some extent limits their scope to doing business in the Single Market.

68% of the SMEs perceive regulatory barriers as restrictive for their ability to establish a local presence, an area seen as offering great business potential.

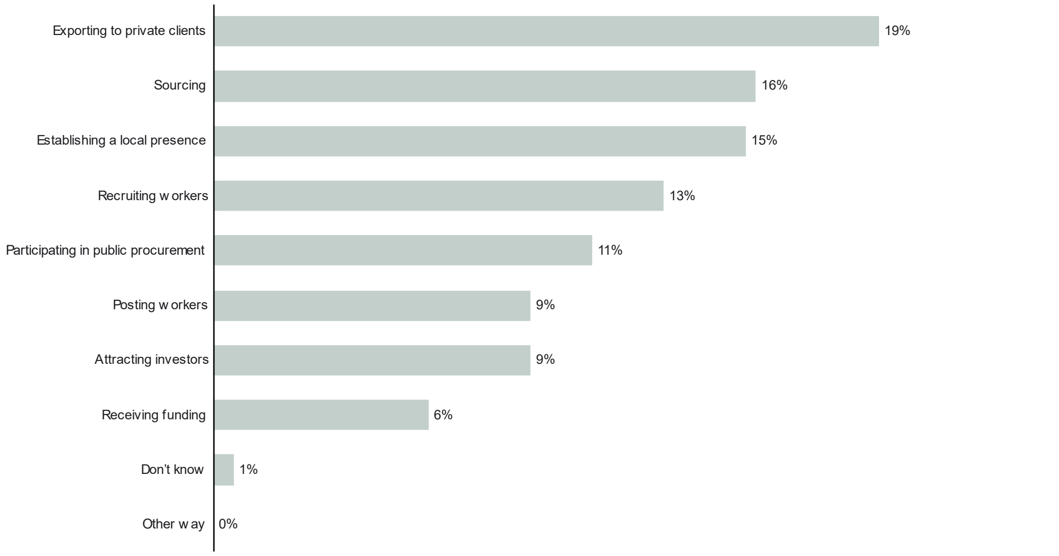
95% of the SMEs state that simplification of administrative procedures will help them do more business in the Single Market.

Need for diversifying Irish SME exports

Among the SMEs that participated in the survey, 95% state that access to the Single Market is important to their business. 53% of the SMEs say that they benefit to a great extent from the Single Market, while 42% assess that they benefit to some (35%) or a lesser extent (7%), see Figure 14 in Appendix 1. The SMEs in the survey mainly export to private businesses as well as individuals (19%) or source (16%) from other firms in the Single Market, see Figure 4. Other activities include establishing a local presence (15%) and recruiting workers (13%).

The potential SME exporters confirm that there is potential for them to benefit from the Single Market. 29% of these SMEs see a potential for either participating in public procurement, posting workers, recruiting workers or attracting investors, respectively (see Figure 15 in Appendix 1). Only a limited number of potential SME exporters participated in the survey, and this finding is therefore not representative of other Irish SMEs that are currently not exporting but would like to begin exporting to the Single Market.

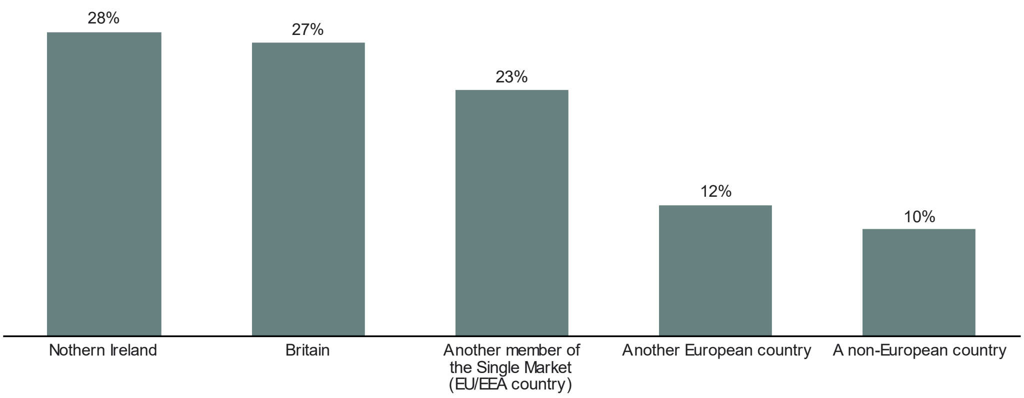
Figure 4: Irish SMEs mainly use the Single Market for exporting and sourcing



Source: Implement Economics based on an SME survey of 203 Irish SMEs (see Appendix 1 for further details).
Note: Question from survey: 'In which way does your company convey business in the Single Market?', n=112. Shares summarise to more than 100% as respondents can choose multiple answers.

From an Irish perspective, the Single Market is not only a gateway for increasing exports but also for diversifying exports. On average, 55% of the exports from the surveyed SMEs are destined to close neighbours of Ireland – either Northern Ireland (28%) or Britain (27%), and only 23% are on average exported to another member of the Single Market, see Figure 5. Existing export figures reflect historic internationalisation patterns pre-Brexit, where Irish SMEs saw Northern Ireland and Britain as their main export markets.

Figure 5: Irish SMEs mainly export to neighbouring countries



Source: Implement Economics based on an SME survey of 203 Irish SMEs (see Appendix 1 for further details).
Note: Question from survey: 'What share of your company's exports is destined for the markets listed below?', n=109.

The neighbouring countries are therefore often seen as a natural first export destination. 46% of the Irish SME exporters had either Northern Ireland (27%) or Britain (19%) as their first export destination, whereas only 34% had another member of the 26 Single Market members as their first export destination, see Figure 6. Given the size of the Single Market in comparison to the neighbouring markets, there could be a potential for Irish SMEs to increase and diversify their exports through the Single Market.

Figure 6: First export destination, exporters

Source: Implement Economics based on a survey of 203 Irish SMEs.
Note: Question from survey: 'What country do you expect to be your first export destination?', n=195.

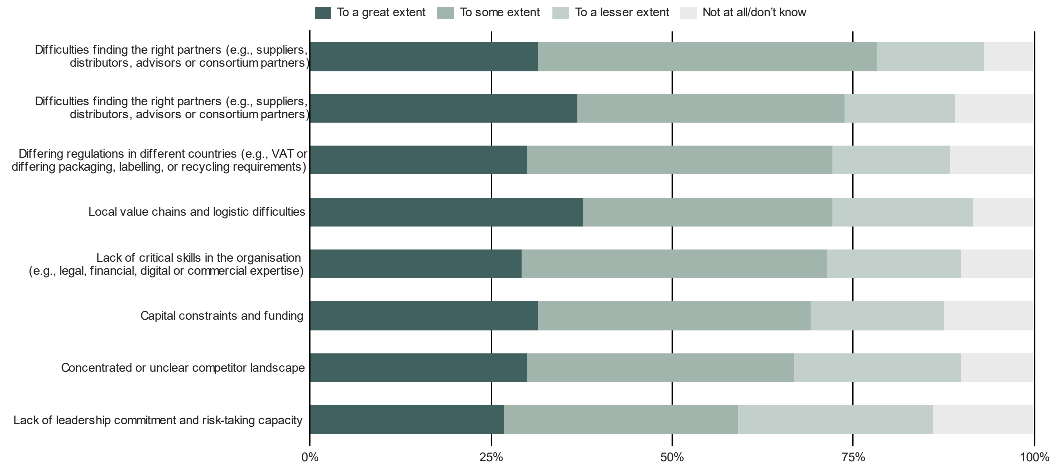
This report aims to demonstrate how European policy makers and the next Commission can continue to simplify, harmonise and standardise EU regulations to the benefit of innovative European SMEs, enabling them to scale up and become globally competitive. The 11 recommendations in the remaining chapters are specific examples of initiatives called for by Irish SMEs.

Irish SMEs call for regulatory harmonisation and simplification

The Single Market has come a long way in removing obstacles to the free flow of goods, services, capital and people across borders. 37% of the SMEs state that EU regulation in their experience to a great extent caters for the specific needs of SMEs, while 56% state to some extent (40%) or to a lesser extent (16%), see Figure 23 in Appendix 1. The Irish SMEs that participated in the survey therefore both confirm that they benefit from the Single Market and that there continues to be a potential for simplifying and harmonising regulation.

Differing regulation across Member States is seen as one of the most critical barriers for Irish SMEs. 32% of the SMEs say that this barrier limits, to a great extent, their scope for doing business in the Single Market (62% say that it to some or lesser extent is a critical barrier), see Figure 7. Differing regulation is almost as critical a barrier as difficulties finding the right partners and customers and meeting their needs. It also ranks higher in criticality than a challenging competitor landscape and other traditional export barriers that are typically addressed at the national level, through various export promotion and accelerator activities.[33]

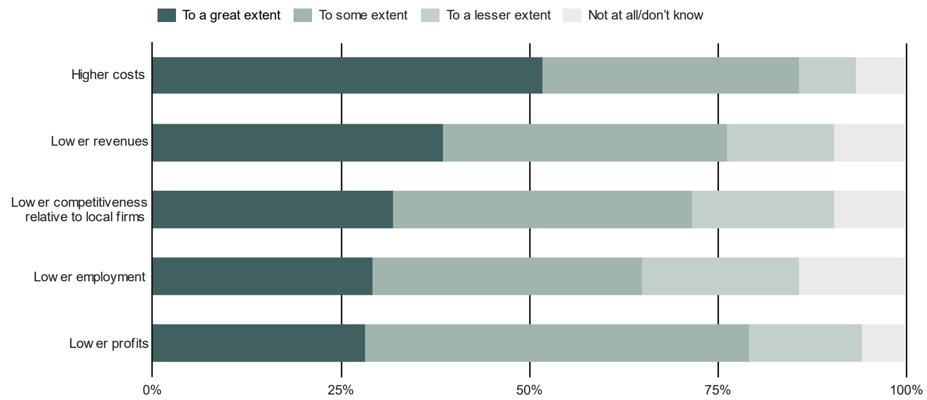
Figure 7: Critical barriers to doing business in the Single Market



Source: Implement Economics based on an SME survey of 203 Irish SMEs (see Appendix 1 for further details).
Note: Question from survey: 'What do you perceive as the most critical barriers to doing business within the Single Market?', n=130.

The SMEs assess that regulatory barriers to a great extent increase their costs (52%), lower their revenue (39%) and erode their competitiveness relative to local firms (32%), see Figure 8.

Figure 8: Consequences of regulatory barriers for exporting SMEs



Source: Implement Economics based on an SME survey of 203 Irish SMEs (see Appendix 1 for further details).
Note: Question from survey: 'What are the implications for your business of regulatory barriers to doing business within the Single Market?', n=106.

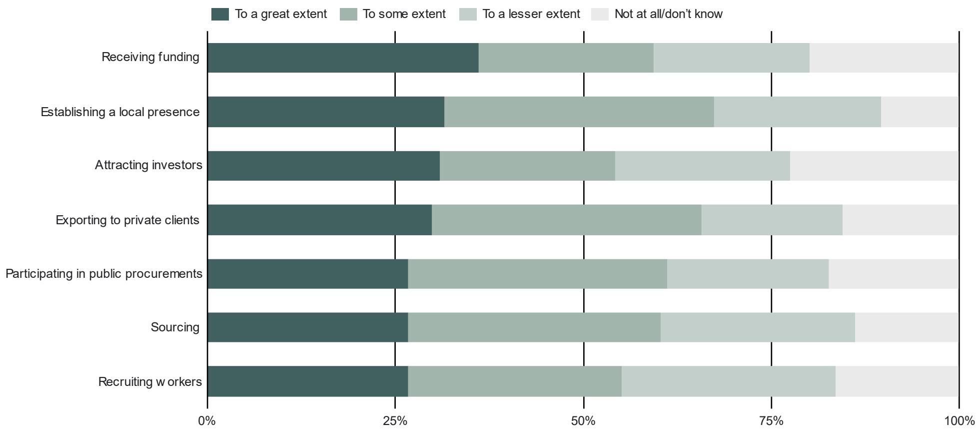
Consequently, the Irish economy misses out on significant opportunities for creating more benefits for workers through higher job creation, better paid jobs and improved job security. In addition, consumers could benefit from reduced regulatory barriers through lower prices, improved product innovation and reduced delivery times.

68% of the SMEs find that regulatory barriers prevent them from establishing a local presence in other Single Market countries, see Figure 9, while 32% even say that regulatory barriers limit, to a great extent, their opportunities for establishing presence across borders. This is also an area where the prospective SME exporters see great potential for growing their business within the Single Market (see Figure 15 in Appendix

1). Local presence is a way for SMEs to adapt to local conditions, build trust, and navigate the complexity of foreign markets more effectively, and reduction of regulatory barriers can therefore help improve the long-term success for Irish SMEs internationally.

Moreover, 66% of the SMEs assess that regulatory barriers prevent them from exporting to private clients in the Single Market, but regulatory barriers also limit the scope for receiving funding and attracting investors.

Figure 9: Regulatory barriers prevent SMEs from doing more business in the Single Market

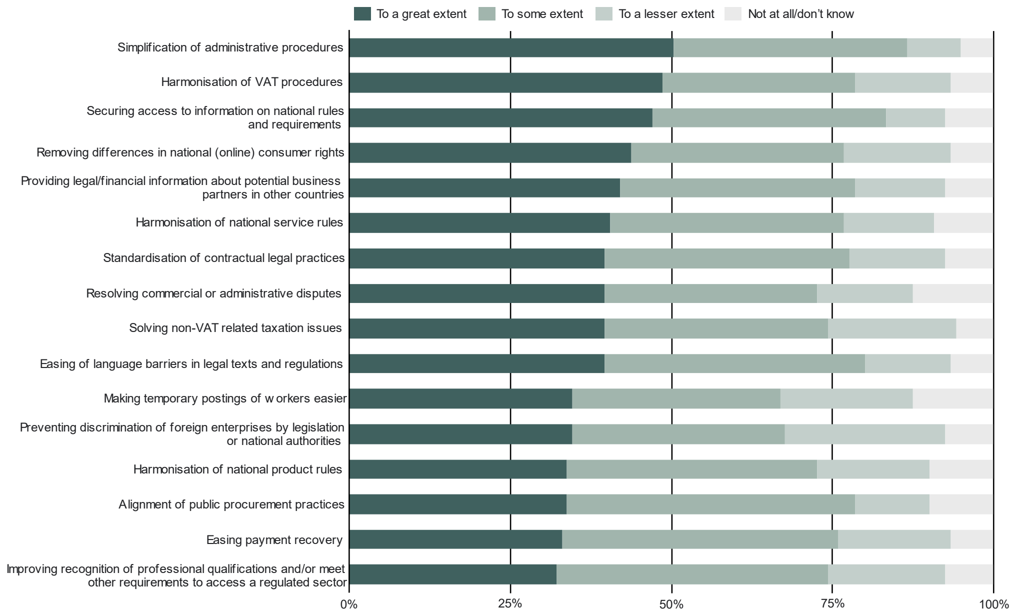


Source: Implement Economics based on an SME survey of 203 Irish SMEs (see Appendix 1 for further details).
Note: Question from survey: 'To what extent do regulatory barriers prevent your firm from doing more business in the Single Market?', n=117.

The SMEs identify several policy initiatives that can help reduce regulatory barriers.[34] 95% of the SMEs point to simplification of administrative procedures, of which 50% say that this initiative will to a great extent help them do more business via the Single Market. The call for simplification aligns with several recommendations brought forward in this report, such as the adoption of an ambitious Single Market Strategy (recommendation #1), a data flow test (recommendation #3), a business-oriented design of the digital European product passport (recommendation #7) and the recognition of digital labelling (recommendation #10). More specifically, Irish SMEs welcome the following initiatives to:

- **Harmonise VAT procedures |** This call for action from Irish SMEs is directly linked to our recommendation to create a single VAT ID and extend the VAT one-stop-shop (recommendation #9).
- **Harmonise national product and service rules |** The upgrade of the European Semester (recommendation #4) and the removal of barriers to trade and climate goods and services (recommendation #6) aim to harmonise implementation of EU regulation and reduce regulatory fragmentation across members of the Single Market. Also, our recommendation to strengthen the use of the Better Regulation Toolbox (recommendation #5) aims to make new regulation easier to implement and therefore prevent new regulatory fragmentation from arising in the future.
- **Secure access to information on national rules and requirements |** Our recommendations to strengthen SOLVIT (recommendation #2) and create a one-stop-shop to Member States' extended producer responsibility (EPR) systems (recommendation #8) will make information more accessible for Irish SMEs.
- **Easing payment recovery |** Our recommendation to create conditions for the development of easy, fast, reliable and low-cost cross border payments (recommendation #11) also aims to ease payment recovery.

Figure 10: Policy initiatives can help firms to do more business in the Single Market



Source: Implement Economics based on an SME survey of 203 Irish SMEs (see Appendix 1 for further details).
Note: Question from survey: 'To what extent would the following policy initiatives help your company do more business within Single Market?', n=121.

3 Set a bold and ambitious vision for the Single Market

BACKGROUND

At its 30th anniversary, Europe has shown how much it can achieve, how ambitiously it can respond, and how swiftly it can act when there is a shared sense of purpose and a united approach.

The Single Market is key to establishing an economy that works for people, securing a stronger Europe in the world, and making Europe fit for the digital age – three of the six headline ambitions in the European Commission's 2023 work programme.

This study calls for the Irish Presidency and all EU governments and institutions to set a bold and ambitious vision for the Single Market to leverage the historic achievements of regulatory harmonisation.

SOLUTIONS

#1 Adopt an ambitious Single Market Strategy

#2 Strengthen SOLVIT by establishing a Single Market Ombudsman in every EU Member State and commit SOLVIT to act more proactively on structural cases and to raise awareness

#3 Conduct a data flow test of all existing and new EU regulation

#1 Adopt an ambitious Single Market Strategy

Securing the four freedoms of the Single Market warrants ongoing review and updates of EU regulation. The Single Market will never be a finished product but will instead need to adjust to technological developments, global conditions and key societal challenges. We urge the next European Commission to be ambitious and visionary when setting out to secure the long-term competitiveness of the EU.

The long-term view on competitiveness outlines how the EU can build on its strengths and achieve more than merely bridging the growth and innovation gap. A forward-looking, well-defined and coordinated EU framework will foster thriving businesses, able to compete on the global market, with attractive jobs and setting global standards.[35]

To achieve this, the European Commission should adopt a Single Market Strategy that clearly reinstates the Single Market at the forefront of the EU's integration project. The Single Market Strategy should take a holistic approach to the full business and consumer journey to ensure that regulations do not unnecessarily limit trade in the Single Market. The Single Market Strategy should be backed by strong political leadership and integrate regulation across all pillars of the Single Market and modes of doing business.

Adopting an ambitious Single Market Strategy can reduce the complex and uneven regulatory requirements that drive up costs for SMEs, such as Lough Ree Distillery and Abbeylands Furniture, as described in the business cases below.

OBSTACLES ARISE DURING THE BUSINESS JOURNEY

Lough Ree Distillery is a family-owned distillery business, specialising in the production of whiskey, gin and vodka. Based out of Lanesborough, Ireland, the company exports their bottles to over 10 countries within the European Union, as well as the United States and United Kingdom. Although the Covid-19 years were difficult for the young company, they made it out onto the other side, and truly started to open for exports in 2021.

Call for action

In comparison to doing business on the US and UK markets, exporting to and supplying goods from the Single Market is relatively seamless for Lough Ree Distillery. While the benefits are many, the company has nonetheless experienced some inefficiencies and hurdles that arise along its business journey on the Single Market.

Excise duties on spirits vary from country to country and transfer of goods from one jurisdiction to another is controlled by the Excise Movement and Control System (EMCS). While the EMCS overall works well for small alcohol producers like Lough Ree Distillery, specific implementation details sometimes vary among EU member states. For example, some countries require duty stamps on alcohol products as part of their excise duty control measures. The specific requirements for duty stamps, including their design, placement, and usage, may differ from one country to another.

Another example of inefficiencies that arise from national requirements and laws is the need to obtain an additional certification to verify the alcohol percentage of exported alcohol products in one country but not others.

> ***"In Estonia, for example, we have to obtain a certificate to certify that our product is indeed 46% alcohol as reported on the label. This requires a that we get a sample analysed, costing a couple hundred euros per sample."***
>
> Peter Clancy, CEO at Lough Ree Distillery

Potential

While the advantages of the Single Market have been numerous for Lough Ree Distillery, additional regulatory simplification, harmonisation, and the introduction of common standards will reduce costs and make it easier to sell to new markets.

OBSTACLES ACCUMULATE DURING THE BUSINESS JOURNEY

Abbeylands Furniture is a small, Irish company that has been specialising in soft furnishings and art since 1959. They supply to independent stores and leading multi retailers across Ireland, the UK and Europe. The UK has always been the company's primary export market, largely due to geographical proximity, but the European Single Market accounts for a growing share of exports.

Call for action

Abbeylands Furniture sees high value in the Single Market, with streamlined regulations and rules. The company's primary barrier to doing business on the Single market relates to the geographical distance and shipping costs between Ireland and other EU countries. Additionally, the CEO of the company, Caroline Horgan reports a lack of common EU standards for the furniture industry, e.g., related to safety, and the high level of difficulty in finding information on national standards. The challenge of clarifying national standards regarding furniture regulations has been particularly worrisome since Brexit. Previously aligned with the UK, national standards now lack clarity regarding any changes that may have occurred.

Diverging national requirements and standards, as well as the associated bureaucratic hurdles, can impede sales and introduce unnecessary costs for businesses.

"Apart from the CE mark, it is difficult to find information about standards, as there is a lot of red tape involved."

Caroline Horgan, CEO at Abbeylands Furniture

Potential

Though already well-functioning, there should be continuous efforts to further integrate the Single Market, as to avoid any unnecessary transaction costs for businesses, which can often be disproportionately high for SMEs. Additional regulatory simplification, harmonisation, and the introduction of common standards will reduce costs, with positive knock-on impacts for public and private entrepreneurs.

#2 Strengthen SOLVIT and commit SOLVIT to act more proactively and to raise awareness

SOLVIT is a problem-solving network that was established in 2002 to help (free of charge) people or businesses when their cross-border rights in the Single Market are breached by public authorities – be it at a local, regional or national level.

SOLVIT is based on co-operation between Member States under the auspices of the European Commission. It intends to offer a faster, informal alternative to starting a court case, submitting a formal complaint to the Commission or launching a petition. There are SOLVIT-centres in all EU Member States, as well as in Iceland, Liechtenstein and Norway.

A review of the SOLVIT institutions across countries shows that European firms lack awareness about the opportunities offered by SOLVIT and, even when they are aware, they rarely use SOLVIT and often lack confidence in SOLVIT as a relevant partner in finding a solution.[36] These conclusions are also confirmed by the interviews conducted with Irish SMEs as part of this study. There is also room for improving the functionality of SOLVIT in several countries:

- **Securing staffing and qualifications |** There is a lack of qualified case handlers and excessive staff turnover rate in several SOLVIT-centres.[37]
- **Addressing structural issues |** SOLVIT is in many cases an underutilised, valuable source of information regarding more structural problems.
- **Identifying regulatory uncertainties |** SOLVIT is mainly used for reporting cases of misapplication of Single Market rules, but Irish SMEs (such as Heat Designs described in the business case below) call for more proactive initiatives to remove the regulatory uncertainty that stem from contradictory and/or overlapping regulation.[38]

OBTAINING INFORMATION ON LOCAL REQUIREMENTS IS DIFFICULT AND DETERS EXPANSION

Heat Design is an Irish company, primarily selling stoves and electrical products. Established over 40 years ago and incorporated in 1997, the company employs 23 people. Approximately 70% of products sold by Heat Design are manufactured by them, while rest of their products are manufactured in various countries, including Portugal, China, and Denmark. Approximately 85% of the company's sales come from Ireland, followed by the UK, while a small share comes from the EU.

Call for action

Breaking into the European market has been a significant hurdle for Heat Design, owing mostly to reasons related to product adaptability to cater to different preferences across the large and heterogeneous market, as well as transport costs. The company also faces challenges navigating different legal practices and the settling of potential disputes in contract agreements, when each EU country has its own legal and administrative traditions. Finding this information and staying up to date on any changes is time-consuming and costly.

"I face considerable uncertainty around legal practices in different jurisdictions, especially when contracts are involved"

Eoin O'Connor, Managing Director at Heat Design

Potential

A strong and proactive SOLVIT network could help SMEs, such as Heat Design, in having a singular point of up-to-date, comprehensive information on national requirements, laws and legal practices. Such a solution would make it easier for Heat Design to export to new EU countries, as currently this is associated with considerable initial investments in terms of money and time.

We propose to establish a Single Market Ombudsman in every EU Member State (as the Head of or in collaboration with SOLVIT) to secure the correct application of EU rules. We also propose to commit SOLVIT to act more proactively on structural cases and to raise awareness, for example through structured roundtables with national business associations. Finally, SOLVIT should be a digital platform for reporting contradictory/overlapping regulation and addressing regulatory uncertainties.[39]

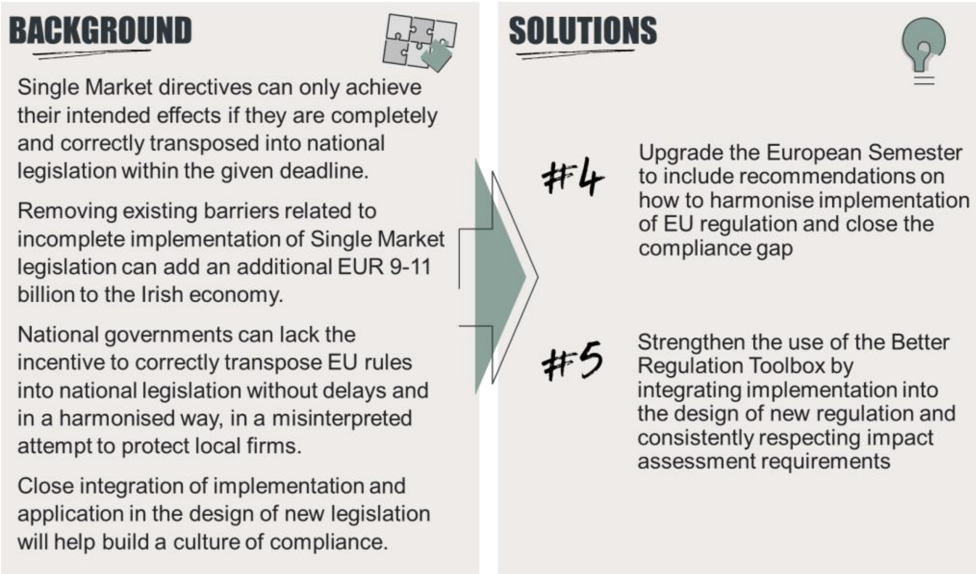
#3 Conduct a data flow test of all existing and new EU regulation

As described in Chapter 2, digitisation is a key driver of productivity and future economic growth.[40] Data flow, i.e., the possibility for firms to have access to, use and transfer data is a prerequisite for digitisation. Digital technologies and solutions also enable and accelerate the green transition across the economy and society.[41]
For these reasons, it is important to remove unjustified obstacles to data flows in the Single Market as the European Commission has attempted to do for example in the regulation of free flow of data.[42] Several data flow obstacles persist and are often rooted in rules aimed at protecting personal privacy (data protection).[43] This is a legitimate protection interest regulated in the EU statute on fundamental rights and thus can be said to have a constitutional value in the EU.

Given the overriding protection interest in personal privacy, we recommend the European Commission to put forward a proposal to promote data flows as far as possible. The proposal is to introduce a 'data flow test' intended to remove unjustified barriers. The starting point is that obstacles aimed at protecting personal privacy must be designed in a way that is least restrictive for data flows.

Such a test would oblige the legislator and regulator (at both EU and national levels) to systematically consider the free flow of data when applying data protection rules (e.g., devising new requirements, adopting guidelines or decisions in individual cases). It would also give businesses a possibility to legally challenge data protection decisions that are perceived disproportionate. Thus, the test would acknowledge the supremacy of the principle of data protection in the EU but limit the risk of abuses that would be harmful to data flows, innovation and the green transition. Removing unjustified barriers to data flows will reduce administrative costs for European firms – one of the main barriers to doing business in the Single Market according to Irish SMEs.

4 Build a culture of trust and compliance



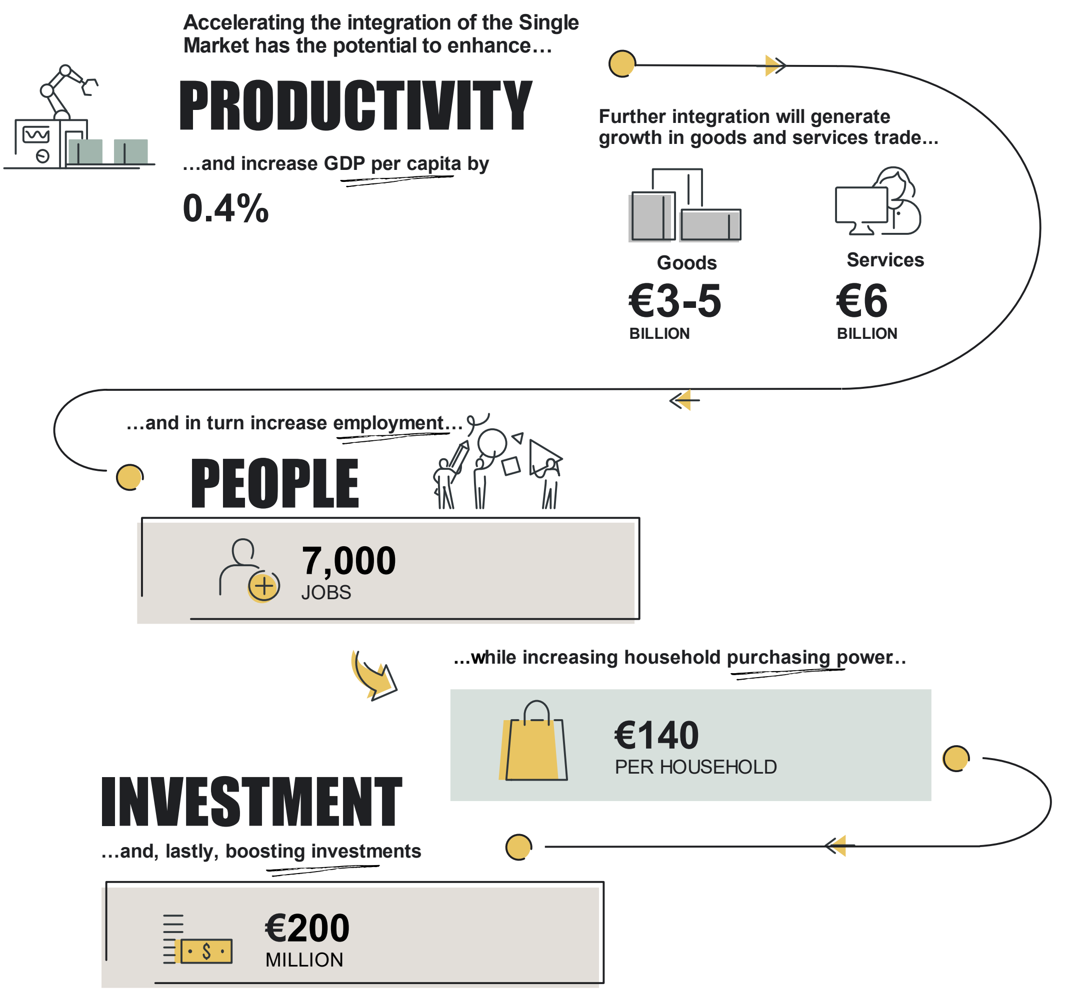
#4 Upgrade the European Semester to include recommendations on how to harmonise implementation of EU regulation and close the compliance gap

Removing existing barriers due to incomplete implementation of EU rules is foreseen to generate large EU-wide economic benefits.[44] The European Commission estimates that removing existing barriers related to incomplete implementation of EU rules on the Single Market would add an additional EUR 520-600 billion to EU GDP annually (a permanent increase in EU income level).[45]

Similar impacts can be expected in Ireland. If benefits for Ireland correspond to Ireland's contribution to total intra-EU trade, GDP per capita could increase by 0.4%, and the goods and services sectors would permanently add EUR 9-11 billion to Irish GDP (EUR 3-5 billion and EUR 6 billion for goods and services, respectively[46]). Furthermore, the increased production of goods and services is expected to support 7,000 jobs. Benefits will spread to Irish households, where household income (purchasing power) is expected to permanently increase by EUR 140. Lastly, investments are expected to increase by EUR 200 million (see Figure 11).[47]

Given Ireland's existing share of trade within the Single Market and the trade potential identified by the SMEs that participated in the survey, benefits for Irish firms from improved market access are likely to be high.

Figure 11: Potential benefits in Ireland from removing existing barriers in the Single Market



The persistent compliance gap undermines the trust of firms and citizens in the effective functioning of the Single Market. It also sends a clear signal to individual governments that lack of compliance has little consequences. We therefore propose to make recommendations on closing the compliance gap and harmonising implementation of EU regulation a part of the European Semester. The advantage is that the European Semester is governed by a combination of hard and soft law due a mix of surveillance mechanisms and possible sanctions, which can be utilised to incentivise governments to close the compliance gap.

The proposed solution will address several of the regulatory barriers that currently prevent Irish SMEs from doing more business through the Single Market.

#5 Strengthen the use of the Better Regulation Toolbox by integrating implementation in the design of new regulations and consistently respecting impact assessment requirements

High-quality legislation is a prerequisite for delivering on EU policy objectives in the simplest, most efficient and effective way possible. Moreover, high-quality legislation is a means to avoiding overregulation and unnecessary administrative burdens for citizens, public administration and businesses (particularly SMEs). Finally, high-quality legislation is designed to facilitate its transposition and practical application in the first place.

The persistent compliance gap and large administrative costs reported by firms doing cross-border activities in the Single Market indicate that more can be done to design EU legislation that effectively reduces complexity and administrative costs of doing business in the Single Market. The Better Regulation Toolbox, with impact assessments as a key ingredient, is a way for the Commission to design, deliver and support the implementation of high-quality policies.[48]

We recommend that the European Commission strengthens the use of the Better Regulation Toolbox by upholding the impact assessment requirement and putting more weight on integrating implementation into the design of new regulation. The proposed solution will contribute to reducing several of the existing regulatory barriers pointed out by SMEs, and the high-quality design of future regulation will reduce the risk of new administrative barriers and unintended negative impacts to emerge in the future.

5 Remove regulatory trade barriers to create a green and circular Single Market

BACKGROUND

Trade is a vehicle for incentivising innovation, spreading innovations across markets and reducing the costs of transitioning to more sustainable production and consumption systems. Frictionless trade of climate goods and services is a prerequisite for the green transition.

The development of a circular EU economy rests on smart regulation to avoid new administrative burdens, limit compliance costs for business and create a simple framework governed by legal certainty. Fragmentation in the Single Market risks slowing down the green transition, and it is crucial that the harmonisation of EU rules continues and is made as easily accessible to EU firms as possible.

SOLUTIONS

#6 Map and remove regulatory barriers to trade for climate goods and services within the Single Market

#7 Design the digital European product passport in a way that makes the circular work of businesses easier

#6 Map and remove regulatory barriers to trade in climate goods and services within the Single Market

The transition to a new, decarbonised production and consumption system requires that climate-related technologies and services become available and are fully deployed. Addressing and removing regulatory barriers to trade in climate goods and services within the Single Market can accelerate decarbonisation in Europe by structuring market signals, incentivising innovation and reducing the costs of adopting new technologies. A fully integrated Single Market in climate goods and services will also strengthen the international competitiveness of EU producers.

The Irish National Energy and Climate Plan (NECP) has committed to achieving a 7% annual average reduction in greenhouse gas emissions between 2021 and 2030. Among other actions, to do so, the NECP outlines a target of increasing energy generated from renewables from 30% to 70% by 2030. An increase of 8.2 GW is to be added to onshore wind capacity, while 1.5 GW of grid scale solar energy will be developed by 2030. [49] Investment priorities of over EUR 21 billion have been laid out over the period 2018-2027, with more coming from other sources and covering the remaining years to 2030.[50]

Regulatory barriers pose significant obstacles to global trade in climate goods (up to 10 times more than tariffs[51]), and the top three barriers include technical barriers to trade (mainly standards, technical regulations and labelling requirements as well as conformity assessment procedures, product testing and certification), local content requirements and challenges concerning government procurement.

Regulatory barriers also hinder the free flow of climate goods and services within the Single Market. The wind industry, for example, experiences complex, contradictory and fragmented regulation that erode their global competitiveness.[52] As wind energy is expected to cover 43% of Europe's electricity by 2030, regulatory barriers make the green transition excessively costly and put pressure on public budgets.[53]

It is difficult to formulate an exact definition of climate goods and services, and there is a risk that the complexity of the problem ends up stalling progress and perhaps even hindering the dismantling of regulatory barriers to trade within the Single Market. We therefore propose that a process be set up where the European Commission applies a "step by step" approach to regulatory harmonisation with the following three steps:

- **Step 1 |** Define an initial list of climate goods and services. A preliminary list is offered in deep dive analysis of Single Market barriers to trade in climate goods and services, which could be a starting point for the work.[54] This could be a minimum list of climate goods and services that are generally accepted as being critical for the green transition.

- **Step 2 |** Map regulatory barriers that hinder free trade in the defined climate goods and services across borders in the Single Market. The mapping should be exhaustive and cover the full business and consumer journey. The mapping should also aim to cover all sources of regulatory barriers, such as lack of compliance with EU regulation, fragmentation in the national implementation of EU regulation, intellectual property rights, uneven access to public procurement, etc.

- **Step 3 |** Take bold steps to remove unnecessary or unjustified regulatory barriers to trade in climate goods and services that are hindering the green transition at both the EU and national level.

The iterative process is illustrated in the figure below.

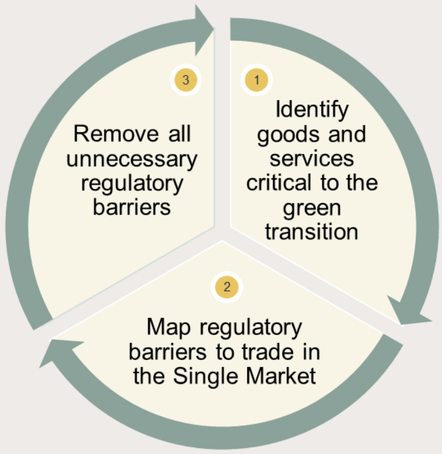
A ROADMAP TO CREATING A TRUE EUROPEAN GREEN SINGLE MARKET

We propose to take a step-by-step approach to removing unnecessary regulatory barriers to trade in climate goods and services within the Single Market.

Complete the three-step process for an **initial list of climate goods and services** that are critical to the green transition and remove regulatory barriers that are unnecessarily restrictive to trade within the Single Market.

Expand the list as new innovative climate solutions emerge and repeat the three-step process.

Continuously ensure that new regulation does not create fragmentation in the European Green Single Market.



#7 Design the digital European product passport in a way that makes the circular work of businesses easier

The Digital Product Passport (DPP) is a key proposal of the Ecodesign for Sustainable Product Regulation (ESPR), which looks to gather information on a product over the value chain to provide a comprehensive understanding of materials and products as well as their associated environmental impact.

A well-designed DPP can make important product-specific information available, making it more accessible to actors in the value chain. As such, it can also serve as a powerful tool for businesses in their contribution to the decarbonisation of the economy. However, if not designed carefully and with stakeholder input, including especially the views of SMEs, there is risk that the DPP will introduce high administrative burdens and costs for businesses, therefore limiting its potential and creating a lack of cohesion within the Single Market. Therefore, we recommend that the DPP is designed with the following features:

- That only relevant data is required, understanding the complexity of and time requirement for gathering detailed information along the entire value chain.
- The required data needs to be aligned with existing databases and systems as to not create silos or duplication of efforts.
- That intellectual property rights are protected – again requiring a careful consideration of the data that is absolutely relevant for meeting the objectives (essentially requiring only 'need-to-know' and not 'nice-to-know' data).

6 Use digital tools to cut costs and create conditions for growth

BACKGROUND

Policy makers play a key role in ensuring a good business environment and keeping regulation updated to changes in economic and technical conditions.

The efficiency and effectiveness of EU legislation can be undermined by a high level of complexity in the application by European firms, particularly by SMEs that have less resources available to cover administrative costs.

Digital tools can be applied to lower the costs of collecting, updating and making information available. Reducing regulatory barriers will enable SME exporters to upscale their business and make it profitable for more irish SMEs to start doing business in the Single Market.

SOLUTIONS

#8 Create a one-stop-shop to Member States' extended producer responsibility (EPR) systems

#9 Create a single VAT ID and extend the VAT one-stop-shop

#10 Recognise digital labelling as a true substitute for physical labelling

#11 Create conditions for the development of easy, fast, reliable, and low-cost cross-border payments for both euro and non-euro payments

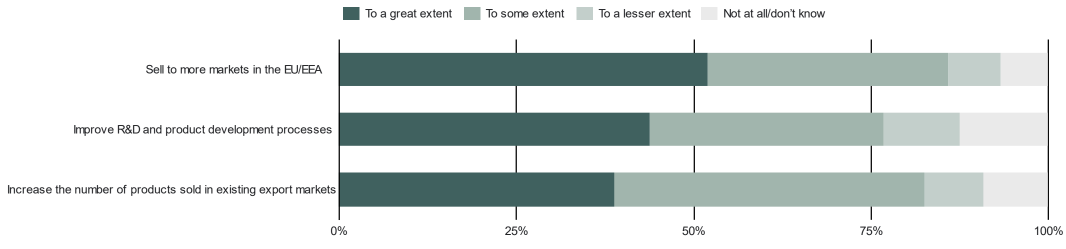
#8 Create a one-stop-shop to the extended producer responsibility (EPR) systems of Member States

Extended producer responsibility (EPR) is an EU environmental policy tool that assigns responsibility to producers for the collection, sorting and treatment of products at the post-consumer stage. EPR schemes vary widely across the EU, both between Member States and between different product categories. Harmonised EPR schemes can help strengthen the circular economy within the Single Market, while lowering unnecessary costs for businesses to act in an environmentally responsible manner.

We recommend establishing a truly harmonised approach to EPR: a digital EPR 'one-stop-shop' solution that would facilitate single EPR registration and reporting across all Member States. Overseen by the European Commission, this one-stop-shop would also serve as a centralised and up-to-date information portal on EPR requirements across all Member States, operating at the product-level. Ideally, significant work should be done to improve and speed up the standardisation of EPR schemes across Member States and, as much as possible, across product categories, prior to and otherwise after the launch of the EPR one-stop-shop.

Such a solution would make it easier and less costly for Irish producers to comply with EPR regulations related to all the products sold in any given Member State, while at the same time lowering regulatory barriers to trade (and therefore increasing trade) within the Single Market and strengthening circularity. In fact, 86% of surveyed Irish SMEs reported that such a solution would to a great or some extent help them sell to more markets in the EU/EEA, and nearly as many reported that it would improve R&D and product development processes as well as increase the number of products sold in existing export markets, see Figure 12.

Figure 12: Benefits for SMEs from an extended responsibility one-stop shop



Source: Implement Economics based on an SME survey of 203 Irish SMEs (see Appendix 1 for further details).
Note: Question from survey: 'To which extent would a digital one-stop shop that facilitates single extended producer responsibility (EPR) reporting across all EU Member States benefit your business through the following?', n=121.

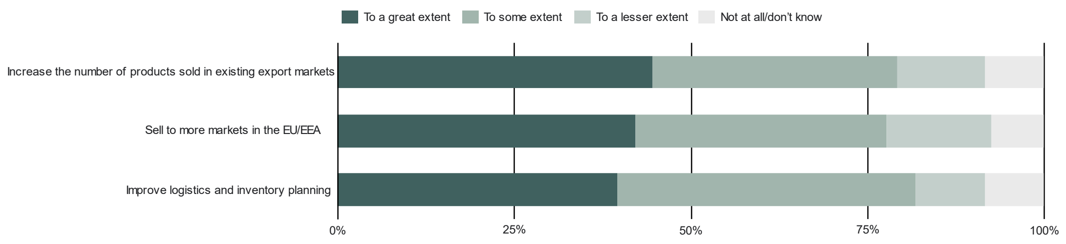
#9 Create a single VAT ID and extend the VAT one-stop-shop

Currently, an SME will require on average 13 documents to complete one VAT registration process, 100 days to get a VAT number, around EUR 8,000 per country per year in compliance costs and up to 60 VAT filings per country per year to be submitted.[55] In 2022, the European Commission proposed a series of measures to modernise and make the EU's VAT system work better for businesses and more resilient to fraud by embracing and promoting digitalisation (the VAT in the Digital Age proposal).

We call for the European Commission to adopt the VAT in the Digital Age proposal with no delays and thereby create a single VAT ID in the EU and extend the existing VAT one-stop-shop concept to cover all goods transactions (including pan-EU inventory placement and onward sales). Such a simplification will allow SMEs, such as the SME described below, to comply with their VAT compliance obligations using a single VAT registration number, cutting down cost and complexity and helping drive growth. Less burdensome VAT procedures is one of the policy initiatives that Irish SMEs would find most beneficial for doing more business in the Single Market.

Among the surveyed Irish SMEs, 80% report that a single VAT ID for all goods transactions would enable them to a great or some extent increase the number of products sold in existing export markets, see Figure 13. Moreover, 78% and 82% of them report that such a solution would enable them to sell to more markets in the EU/EEA and improve logistics and inventory planning.

Figure 13: Benefits for SMEs from introducing a single VAT ID for all goods transactions



Source: Implement Economics based on an SME survey of 203 Irish SMEs (see Appendix 1 for further details).
Note: Question from survey: 'To which extent would the introduction of a single VAT ID for all goods transactions (including pan-EU inventory placement and onward sales) benefit your company through?', n=121.

As well as reducing administrative burdens for SMEs and granting them greater access to the European Single Market, tax authorities will also benefit from a Single VAT ID, as reduction in complexity increases compliance.[56] From the perspective of national governments' public finances, the simplification is likely to result in increased trade leading to additional VAT revenues and a more competitive market in the EU. Finally, customers will benefit from a larger selection, more competitive prices and a better shopping experience when buying goods online.

VAT REGISTRATION REQUIREMENTS PROHIBIT EU EXPANSION

myVolts is a small Irish company, based in Dublin. The company has been specializing in replacement power supplies and music technology products for twelve years. myVolts sells its products worldwide and stores the majority of its stock in the Netherlands, due to lower shipping and warehousing costs as well as shorter fulfilment times.

Call for action

For myVolts to run its current operations, they need to be VAT-registered in 3 countries: in Ireland, where the company is based, in the Netherlands, where the warehouse is located, and Great Britain, which is no longer part of the EU and part of the VAT one-stop-shop (OSS). In order to be able to offer their products in several big European markets, myVolts would need to add new dispatch warehouse locations and register for VAT in those locations. However, generating and filing VAT reports in each country in which they are registered generates extra costs and consumes time.

> *"Expensive and burdensome VAT registration procedures related to new warehouse locations prevents us from offering our products in several big European markets"*

Adam Kulakowski, Selling partner at myVolts

Potential

Extending the VAT OSS to pan-EU inventory storage and onward sales would considerably reduce the need for multiple VAT registrations - decreasing costs and time burden associated with establishing warehouses in more countries. A single VAT ID across the EU would allow myVolts to take full advantage of the Single Market and enable further expansion to key EU countries.

#10 Recognise digital labelling as a true substitute for physical labelling

To place products on the EU market, producers are required to indicate a variety of product compliance and conformity information on their products – both at the EU and Member State level. Varying labelling requirements present a high resource and administrative cost to producers, especially for SMEs, such as Sliabh Liag Distillery described in the business case below. Additionally, the EU still relies exclusively on physical marking on products and/or product packaging, whereby digital communication on product labels is done only on a voluntary basis.

Digital labelling can respond to the increased demand for transparency on products purchased by producers. It can convey more information to consumers, beyond what is possible on physical labels. For instance, in the EU medical device regulations, standards are already in place prescribing how a device needs to be labelled so that the user understands that the instructions and more information can be found online.

Digital labels also have the advantage of being easily updatable, findable and able to be provided in all official languages for a specific product – at a much lower cost and higher convenience to producers than physical labels.[57] As once-written product information may quickly become irrelevant as technologies advance and legislations change, digital labelling provides a more flexible, efficient and scalable option to address this challenge. Digital labelling, as an alternative to physical labelling, can facilitate trade across borders within the Single Market.

We therefore recommend that the European Commission brings EU labelling requirements to the digital era by providing manufacturers the option to choose whether to market their product digitally or physically – i.e., recognising digital labels as true substitutes for physical labels across product groups and Member States. This should build on the momentum and learnings already taking place within the digital labelling proposals of the chemical regulations.[58] Also, we ask that physical labelling should only contain the minimum essential information.

DIFFERENT LABELLING REQUIREMENTS INTRODUCE UNNECESSARY COMPLEXITIES AND COSTS

Sliabh Liag Distillers is a family-owned business based at the Ardara Distillery in Ireland's County Donegal. The company produces peated whiskeys and gin, and also operate a blending business. Founded in just 2014, today the company exports to over 40 countries, including most of the EU, US, Canada, South Africa and more. Over 95% of the company's sales come from exports.

Call for action

Sliabh Liag Distillers has experienced some regulatory and bureaucratic hurdles while expanding to the European Single Market. One of the challenges relates to different national labelling requirements, that are especially cumbersome for alcohol products. For example, these requirements relate to information such as list of ingredients, health warnings as well as recycling instructions, which can vary from country to country. Labelling requirements are also made difficult due to different national interpretations relating to alcohol products. While majority of the mandatory labelling requirements are covered by local distributors, they introduce additional costs throughout the value chain, ultimately meaning less value for Sliabh Liag Distillers.

"For example, currently one country has introduced a narrow definition of what 'gin' is and how it can be referred to on bottles. This means that we essentially cannot include 'maritime' as a descriptive term for our gin."

James Doherty, Managing Director at Sliabh Liag Distillery

Potential

The patchwork of national requirements related to labelling that Sliabh Liag Distillers observes on the European market introduces unnecessary costs and delays to sales.

Though streamlining and simplification of labelling requirements across the Single Market would be most beneficial, a digital labelling, that acts as a true substitute for physical labelling, would potentially make it much easier and less costly to include and update product information in local languages and to local requirements and to include information that would educate rather than create fear where there are health concerns.

#11 Create conditions for the development of easy, fast, reliable and low-cost cross-border payments for both euro and non-euro payments

As the survey clearly shows, Irish SMEs find it critical for the functioning of the Single Market that cross-border payment methods are affordable and effortless for businesses and consumers. The European Commission has already presented a Proposal for a Regulation of the European Parliament and of the Council on combating late payment in commercial transactions.

We encourage the EU to design an enabling, open and competitive legislative framework to facilitate low-cost, easy, safe and reliable cross-border payments. Regulators should avoid foreclosing access to seamless provision of cross-border solutions. Instead, appropriate incentives should foster a competitive ecosystem to empower consumers to make informed decisions, while reducing cost of payments for merchants.

A more competitive framework for cross-border payments would ensure that EU citizens have access to a diverse range of providers, all of whom operate within an open, competitive setting, including traditional financial providers such as banks, fintech providers and platform operators. The EU should also lead the regulatory development concerning instant payments and central bank digital currencies to further modernise cross-border financial services, set high standards internationally and ensure the competitiveness of the EU.

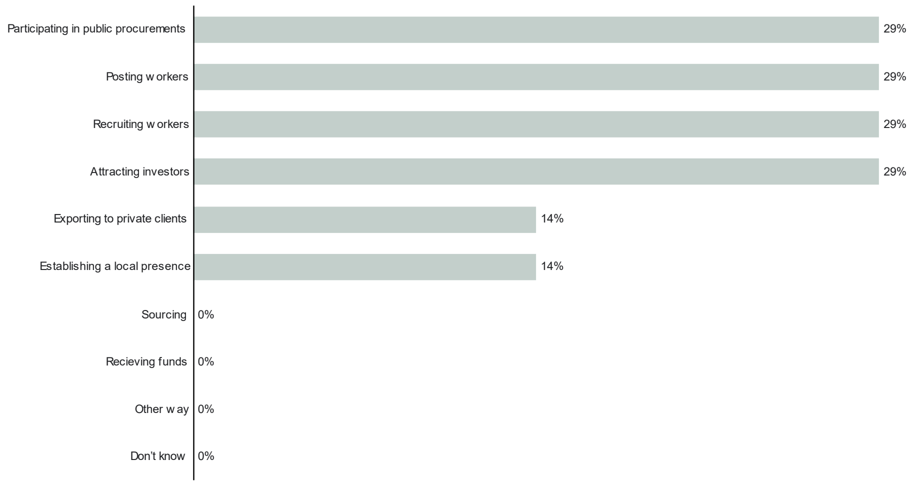
Appendix 1 Description of the SME survey

To identify key barriers and possible solutions to conducting business on the Single Market, we carried out a survey in close collaboration with Ibec. The target group of the survey was SMEs that either export or would like to export through the Single Market. The survey contained a total of 18 questions. In total, 216 SMEs participated in the survey, of which 72% (156) are exporters and 28% (60) are SMEs that currently do not export but would like to export (potential exporters). Most of the respondents conduct business in 'Manufacturing' (41%) and 'Other services' (11%). The survey responses include a good representation of different-sized SMEs. This appendix contains detailed responses.

Figure 14: Benefits from doing business in the Single Market, exporters

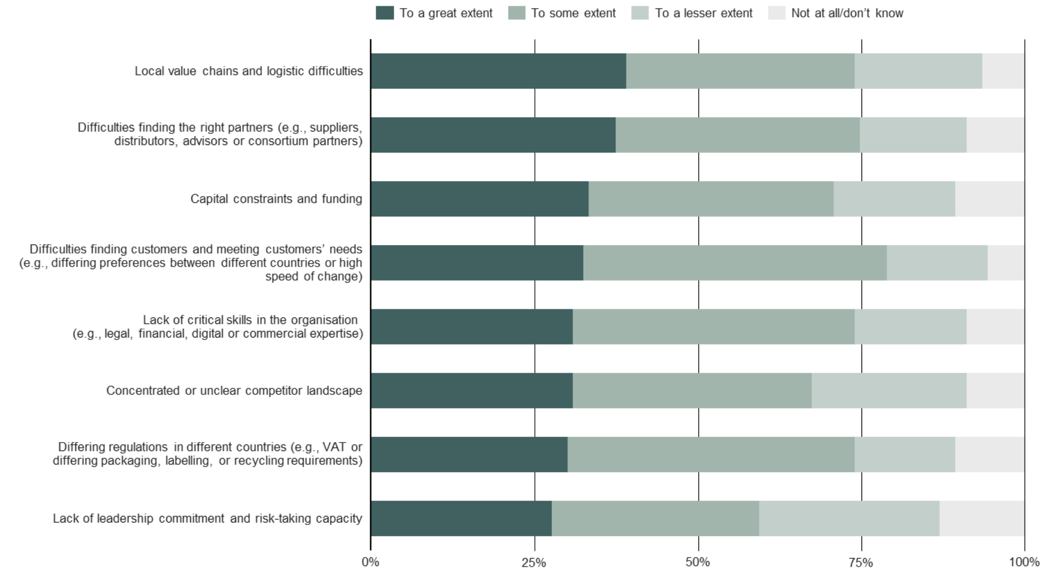
Source: Implement Economics based on a survey of 203 Irish SMEs.
Note: Question from survey: 'To what extent does your company benefit from the Single Market?', n=112.

Figure 15: Potentials for growing business in the Single Market, potential exporters



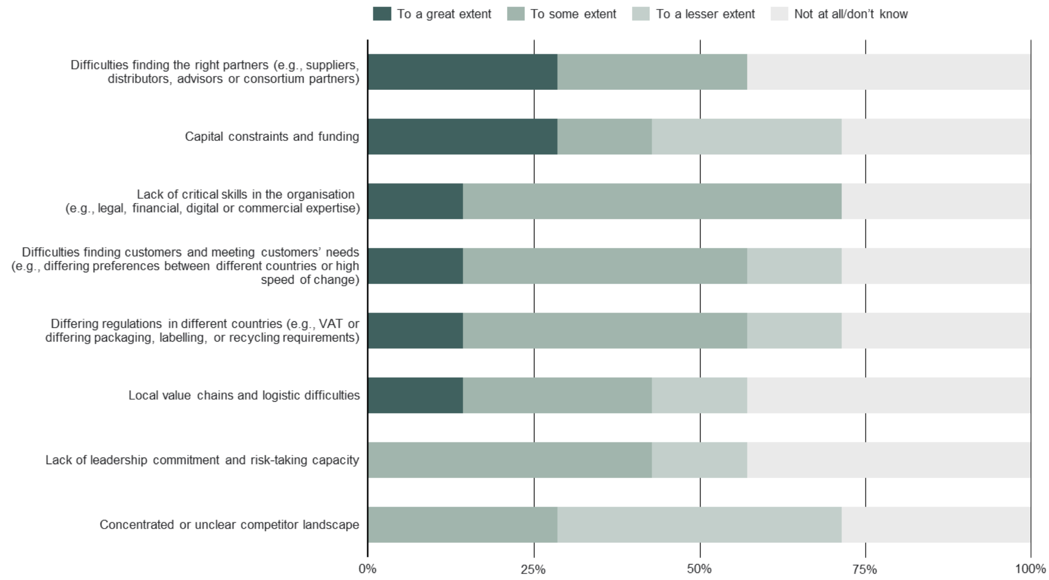
Source: Implement Economics based on a survey of 203 Irish SMEs.
Note: Question from survey: 'Where do you see the largest potentials within the Single Market for growing your business?', n=7.

Figure 16: Critical barriers to doing business in the Single Market, exporters



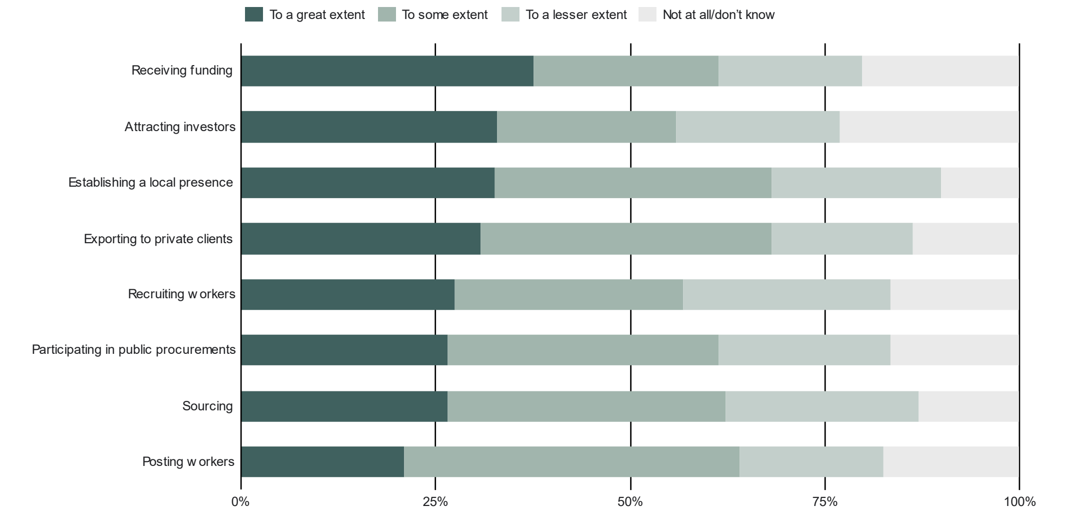
Source: Implement Economics based on a survey of 203 Irish SMEs.
Note: Question from survey: 'What do you perceive as the most critical barriers to doing business within the Single Market?', n=123.

Figure 17: Critical barriers to doing business in the Single Market, potential exporters



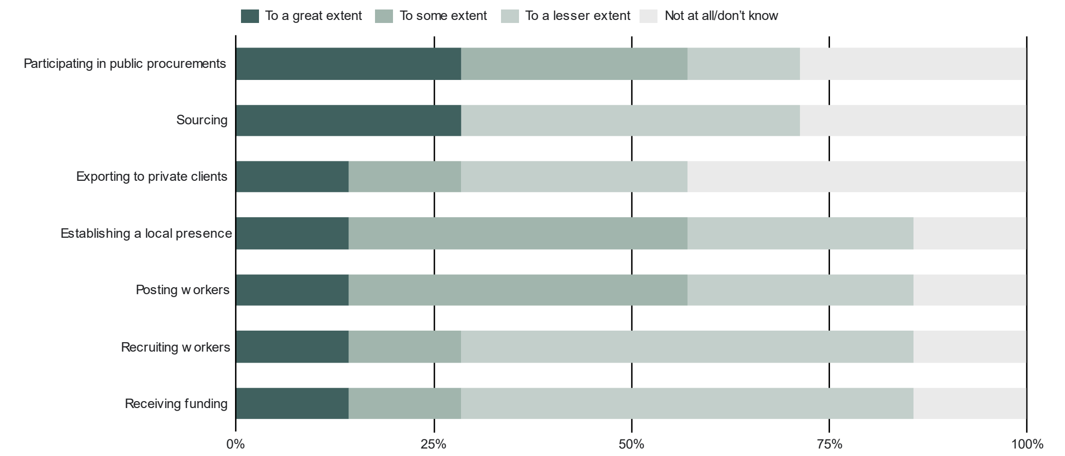
Source: Implement Economics based on a survey of 203 Irish SMEs.
Note: Question from survey: 'What do you perceive as the most critical barriers to doing business within the Single Market?', n=7.

Figure 18: How regulatory barriers hinder doing more business in the Single Market, exporters



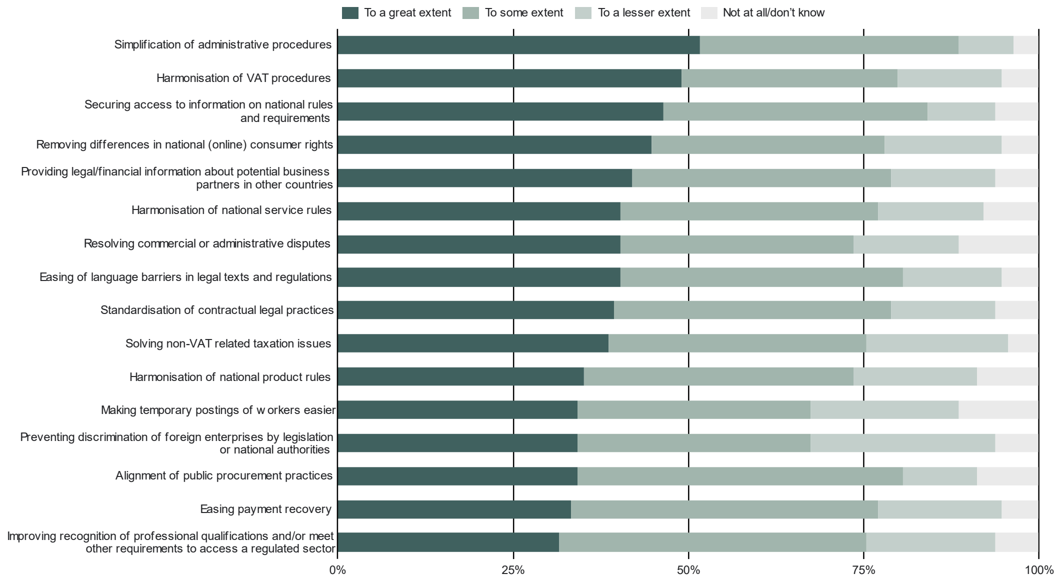
Source: Implement Economics based on a survey of 203 Irish SMEs.
Note: Question from survey: 'To what extent do regulatory barriers prevent your firm from doing more business in the Single Market?', n=117.

Figure 19: How regulatory barriers hinder doing business in the Single Market, potential exporters



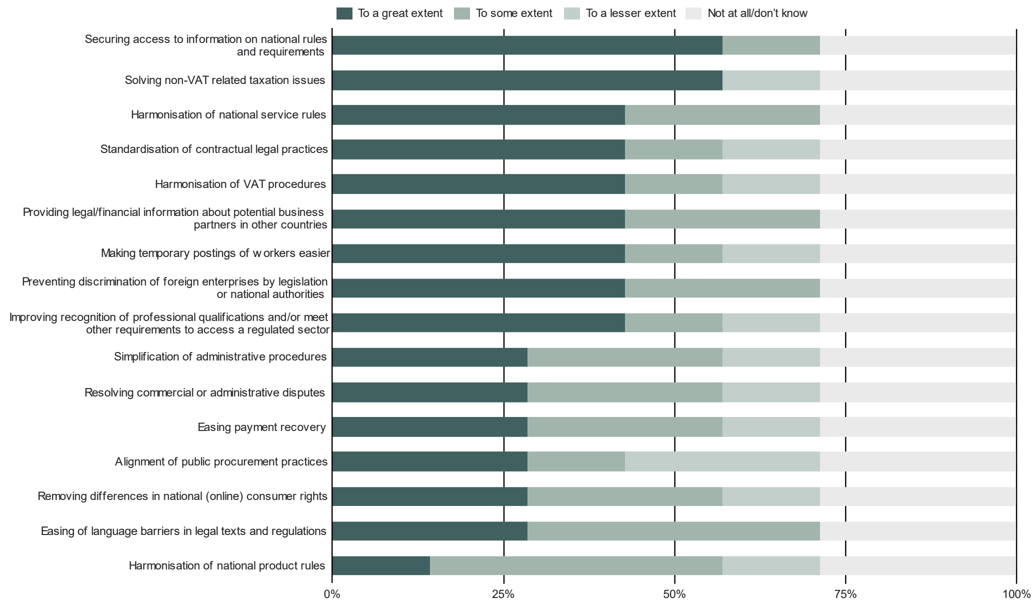
Source: Implement Economics based on a survey of 203 Irish SMEs.
Note: Question from survey: 'To what extent do regulatory barriers prevent your firm from doing business in the Single Market?', n=7.

Figure 20: Policy initiatives that can help doing business in the Single Market, exporters



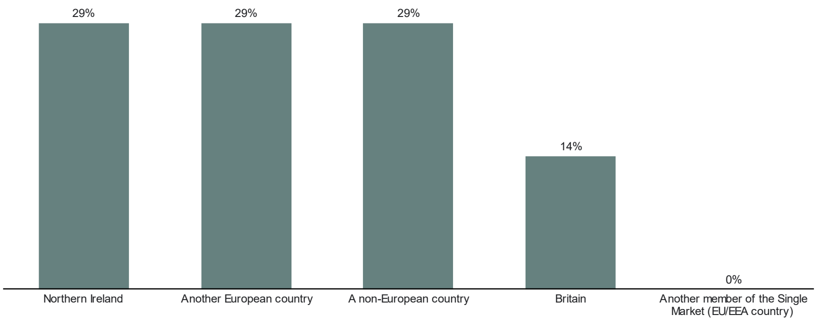
Source: Implement Economics based on a survey of 203 Irish SMEs.
Note: Question from survey: 'To what extent will the following policy initiatives help SMEs with doing business in the Single Market?', n=114.

Figure 21: Policy initiatives that can help doing business in the Single Market, potential exporters



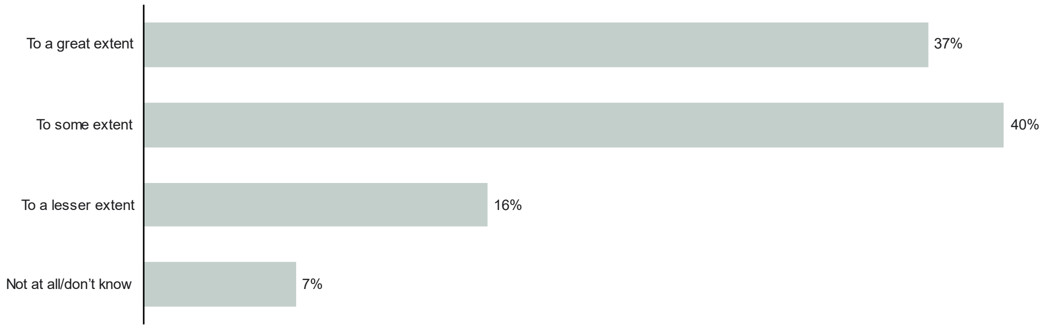
Source: Implement Economics based on a survey of 216 Irish SMEs.
Note: Question from survey: 'To what extent will the following policy initiatives help SMEs with doing business in the Single Market?', n=7.

Figure 22: Expected first export destination, potential exporters



Source: Implement Economics based on a survey of 203 Irish SMEs.
Note: Question from survey: ‘What country do you expect to be your first export destination?’, n=7.

Figure 23: The SMEs experience of whether EU regulation caters for the specific needs of SMEs



Source: Implement Economics based on a survey of 203 Irish SMEs.
Note: Question from survey: ‘To which extent do you experience that EU regulation caters for the specific needs of SMEs?’, n=112.

List of endnotes

[1] European Commission (2023). *EU competitiveness beyond 2030: looking ahead at the occasion of the 30th anniversary of the Single Market.*

[2] European Council (2023). *Conclusions from meeting in Brussels*, 30 June 2023, EUCO 7/23, CO EUR 5, CONCL 3.

[3] LE Europe (2017). *The EU Single Market: Impact on Member States.* The estimation results quantify the extent to which the levels of the outcome variables were higher in 2015 than they would have been in the absence of increased Single Market integration.

[4] European Commission (2020). *A Single Market that Delivers for Businesses and Consumers.*

[5] Department of Communications, Climate Action and Environment (2019). *National Energy & Climate Plan 2021-2030.*

[6] OECD (2022). *Trade in goods and services*.

[7] See https://www.epcsummit2023.md/president-maia-sandus-message-regards-organisation-epc-summit.

[8] LE Europe (2017). *The EU Single Market: Impact on Member States.*

[9] In Ireland, 19% of jobs depends on Intra-EU export (European Commission (2018). *EU export to the EU: Effects on employment and income*) and another 35% depends on extra-EU export (European Commission (2021): *EU exports to the world: effects on employment*), according to the newest publications.

[10] European Commission (2018). *EU export to the EU: Effects on employment and income.* Here using the share of jobs supported by intra-EU exports, as no estimate exists for the Single Market.

[11] OECD (2023). *X – TEC by partner countries and size-class [TEC3_REV4].*

[12] OECD (2023). *FDI statistics by partner country and by industry – Summary [BMD4].*

[13] Eurostat (2023). *Population on 1 January by age group, sex and country of birth [MIGR_POP3CTB] and* Eurostat (2023). *EU and EFTA citizens who are usual residents in another EU/EFTA country as of 1 January [MIGR_POP9CTZ].* No datapoint exist for Malta, Cyprus, and Estonia in the last source, implying that Irelanders living in these countries are not included.

[14] The sources behind the infographic include the following: Overall benefits: LE Europe (2017). *The EU Single Market - Impact on Member States*, Trade: Eurostat [TEC3_REV4], [LFSI_EMP_A] and WKO (2023). *30th Anniversary of the Single Market – An unfinished milestone of integration,* Investment: Eurostat [FATS_OUT2_R2], [FATS_G1A_08], OECD [FDI statistics according to Benchmark Definition 4th Edition (BMD4)] and lastly Mobility: Eurostat [MIGR_POP3CTB], [MIGR_POP9CTZ]. Note: intra-EU export-supported jobs are estimated using data on export to the Single Market from WKO (2023) and the assumption used in WKO (2023) stating that every billion exported secures around 10,000 jobs.

[15] Eurostat (2023). *Annual enterprise statistics by size class for special aggregates of activities (NACE Rev.2) [SBS_SC_SCA_R2].*

[16] Eurostat (2023). *Persons employed in the non-financial business economy by size class of employment [TIN00148].*

[17] European Commission (2022). *Internal Market, Industry, Entrepreneurship and SMEs*.

[18] WTO (2016). *Levelling the Trading Field for SMEs.*

[19] USITC (2019). *U.S. SME Exports: Trade-related Barriers Affecting Exports of U.S Small and Medium-sized Enterprises to the United Kingdom*.

[20] HBS (2018). *25 Years of the European Single Market*.

[21] Eurostat (2023). *Trade by NACE Rev. 2 activity and enterprise size class [EXT_TEC01].* Note, data is only available for intra-EU export. Therefore, the calculation excludes exports to Norway, Liechtenstein and Iceland.

[22] BEUC (2022). *Making the most of EU Advance Purchases of Medicines*.

[23] European Commission (2022). *Questions & Answers on Vaccine Negotiations*.

[24] European Commission (2022). *Safe COVID-19 Vaccines for Europeans*.

[25] European Council (2022). *EU Sanctions against Russia Explained*.

[26] Bradford, A. (2020). *The Brussels Effect: How the European Union Rules the World* (p. 71). Oxford Academic.

[27] European Commission (2022a). *Negotiations and Agreements*.

[28] WTO (2022). *Regional Trade Agreements Database*.

[29] European Commission (2022). *EU Trade Agreements: Delivering for Europe's Businesses*.

[30] Bradford, A. (2020). *The Brussels Effect: How the European Union Rules the World* (p. 23). Oxford Academic.

[31] Bradford, A. (2020). *The Brussels Effect: How the European Union Rules the World* (p. 63). Oxford Academic.

[32] European Commission (2021). *Strategic Dependencies and Capacities*.

[33] The response categories used in this survey questions are from a survey commissioned by Business Finland and conducted by Implement Consulting Group, see Implement Consulting Group (2022). *Impact study on economic growth.*

[34] The response categories used in this survey questions are based on the business survey from Eurochambres (2020). *The State of the Single Market: Barriers and Solutions*.

[35] European Commission (2023). *EU Competitiveness beyond 20430: Looking ahead at the Occasion of the 30th Anniversary of the Single Market*.

[36] Eurochambres (2019). *The State of the Single Market: Barriers and Solutions*.

[37] European Commission (2020). *Single Market Scoreboard.*

[38] The country-of-origin principle states that, where an action or service is performed in one country but received in another, the applicable law is the law of the country where the action or service is performed. Strengthening this principle ensures a regulatory regime that either provides full harmonisation of law or effectively applies country of origin principles based on a culture of trust among Member States and their administrations. This is necessary to address over-implementation and gold-plating. National authorities should fully respect the principle of mutual recognition and stop restricting market access based on national rules. Following this principle is important for the free movement of people and will pave the way for a full implementation of the Services Directive.

[39] De Streel et al. (2020). *The E-commerce Directive as the Cornerstone of the Internal Market, requested by the IMCO Committee*.

[40] European Commission (2020). *Shaping the digital transformation in Europe*.

[41] Implement Consulting Group (2022). *Digital Decarbonisation - How the Digital Sector is Supporting Climate Action,* commissioned by Google.

[42] See EUR-Lex (2018). *Regulation (EU) 2018/1807 of European Parliament and of the Council of 14 November 2018 on a framework for the free flow of nonpersonal data in the European Unio*n.

[43] Kommerskollegium (2021). *Främja Dataöverföring och Datadelning genom ett Nytt Dataflödestest*.

[44] European Parliamentary Research Service (2014). *The Cost of Non-Europe in the Single Market*.

[45] European Commission (2020). *A Single Market that Delivers for Businesses and Consumers.*

[46] The calculations are based on European Commission (2020). *A Single Market that Delivers for Businesses and Consumers.* We applied the Irish share of total Intra-EU trade to get a country-level estimate for the growth potential in goods and services trade in Ireland from Eurostat (2023). *Trade by NACE Rev. 2 activity and enterprise size class [EXT_TEC01].*

[47] Implement Economics calculation based on LE Europe (2017). *The EU Single Market: Impact on Member States*, European Commission (2020). *A Single Market that Delivers for Businesses and Consumers,* and Eurostat (2023). *Trade by NACE Rev. 2 activity and enterprise size class [EXT_TEC01].*

[48] European Commission (2021). *Better Regulation' Toolbox 2021* (Ch.1).

[49] European Commission. *Summary of the Commission assessment of the draft National Energy and Climate Plan 2021-2030.*

[50] Department of Communications, Climate Action and Environment (2019). *National Energy & Climate Plan 2021-2030.*

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[55] European Commission (2017). *Modernising VAT for E-commerce: Question and Answer*.

[56] European Commission (2022). *VAT in the Digital Age: Final Report, Volume 3: Single Place of VAT Registration and Import One-Stop Shop* (p. 41).

[57] VVA (2018). *Study for the Introduction of an E-labelling Scheme in Europe.* DigitalEurope.

[58] European Commission (2021). *Simplification and Digitalisation of Labels on Chemicals.*

About us

Implement Economics is the economics expert unit of Implement Consulting Group. Our experts are advisers to corporate and government decision-makers within regulation, trade, digitisation, decarbonisation, and globalisation.

The team has conducted several studies on the Single Market and provided a series of studies for the European Commission and governments in Europe, Asia, and the Americas. The team applies economic modelling, data analytics and econometrics to help solve worthwhile problems.

Headquartered in Copenhagen and with offices in Aarhus, Stockholm, Malmo, Gothenburg, Oslo, Zurich, Munich, Hamburg, and Raleigh (NC), Implement Consulting Group employs more than 1,000 consultants working for multinational clients on projects worldwide.

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