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EVALUATION

of the

Regulation (EU) 2019/1020 of the European Parliament and of the Council

of 20 June 2019 on market surveillance and compliance of products and amending Directive 2004/42/EC and Regulations (EC) No 765/2008 and (EU) No 305/2011

{SWD(2026) 310 final}

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Glossary

Term or acronym	Meaning or definition
AdCo	Administrative Cooperation Group
AML	Anti-Money Laundering
BRT	Better Regulation Toolbox
DG GROW	Directorate-General Internal Market, Industry, Entrepreneurship and SMEs
DG TAXUD	Directorate-General for Taxation and Customs Union
DPP	Digital Product Passport
DSA	Digital Services Act
EC	European Commission
EEA	European Economic Area
EMC	Electromagnetic Compatibility
EMCD	Electromagnetic Compatibility Directive
EO	Economic Operator
EP	European Parliament
ESPR	Ecodesign for Sustainable Products Regulation
EU	European Union
EU CSW-CERTEX	EU Customs Single Window - CERTEX
EUPCN	EU Product Compliance Network
FSP	Fulfilment Service Provider
FTE	Full-Time Equivalent
GPSR	General Product Safety Regulation
IA	Impact Assessment
ICSMS	Information and Communication System for Market Surveillance
JRC	Joint Research Centre
MSA	Market Surveillance Authority
MSR	Market Surveillance Regulation
NLF	New Legislative Framework
OM	Provider of Online Marketplaces
PoC	Points of Comparison
REACH	Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)
SLO	Single Liaison Office
SME	Small and Medium-sized Enterprise
SMP	Single Market Programme
SO	Specific Objective
SWD	Staff Working Document

1. INTRODUCTION

1.1 Purpose and scope of the evaluation

Article 42 (1) of Regulation (EU) 2019/1020 on market surveillance and compliance of products (the MSR)[1] requires the European Commission to evaluate this regulation by 31 December 2026.

This Staff Working Document present the findings of that evaluation. It assesses the extent to which the MSR achieved its objectives and remains fit for purpose, building on the findings of the Evaluation of Article 4[2] and drawing on a support study carried out by an external contractor. This evaluation is framed by the Commission's Single Market Strategy[3] that has identified *outdated harmonised product rules and lack of product compliance* among the Terrible Ten barriers hindering the effective functioning of the Single Market. It informs the preparation of the European Product Act, a legislative package planned for adoption in Q3 2026 that will revise rules on market surveillance and on conformity assessment of products[4] in one act and revise the rules on standardisation[5] in another act.

The objective of the MSR is to improve the functioning of the internal market by strengthening the market surveillance of products covered by the Union harmonisation legislation, with a view to ensuring that only compliant products that fulfil requirements providing a high level of protection of public interests - such as health and safety in general, health and safety in the workplace, the protection of consumers, the protection of the environment and public security and any other public interests protected by that legislation - are made available on the Union market.

In terms of scope, the analysis covers the legal framework set out in the Regulation. The period under review runs from 16 July 2021, when the Regulation became fully applicable, to the first quarter of 2026, subject to data availability. Geographically, the evaluation extends to the European Economic Area (EEA), encompassing the EU Member States and the European Free Trade Association countries: Iceland, Norway and Liechtenstein.

In line with the Better Regulation Guidelines, the evaluation is structured around five criteria: effectiveness, efficiency, coherence, relevance and EU added value. In line with Article 42(2), particular attention is given to whether the MSR has achieved its objective, notably with regard to reducing the number of non-compliant products on the Union market, ensuring effective and efficient enforcement of Union harmonisation legislation within the Union, improving cooperation between competent authorities, and strengthening the controls on products entering the Union market, while taking into account the impact on business and in particular on small and medium-sized enterprises (SMEs). In addition, this evaluation also assesses to the scope of application of the

[1] Regulation (EU) 2019/1020 of the European Parliament and of the Council of 20 June 2019 on market surveillance and compliance of products and amending Directive 2004/42/EC and Regulations (EC) No 765/2008 and (EU) No 305/2011, OJ L 169, 25.6.2019, pp. 1–44, ELI: http://data.europa.eu/eli/reg/2019/1020/oj

[2] EC (2025), Report from the Commission to the European Parliament and the Council on the implementation of Article 4 of Regulation (EU) 2019/1020 of the European Parliament and of the Council on market surveillance and compliance of products, COM(2025) 97 final, 20 March 2025.

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

[4] Regulation (EC) No 765/2008 of the European Parliament and of the Council of 9 July 2008 setting out the requirements for accreditation and repealing Regulation (EEC) No 339/93 and Decision No 768/2008/EC of the European Parliament and of the Council of 9 July 2008 on a common framework for the marketing of products, and repealing Council Decision 93/465/EEC, OJ L 218, pp. 82–128, ELI: http://data.europa.eu/eli/dec/2008/768(1)/oj

[5] Regulation (EU) No 1025/2012 of the European Parliament and of the Council of 25 October 2012 on European standardisation, amending Council Directives 89/686/EEC and 93/15/EEC and Directives 94/9/EC, 94/25/EC, 95/16/EC, 97/23/EC, 98/34/EC, 2004/22/EC, 2007/23/EC, 2009/23/EC and 2009/105/EC of the European Parliament and of the Council and repealing Council Decision 87/95/EEC and Decision No 1673/2006/EC of the European Parliament and of the Council, OJ L 316, 14.11.2012, pp. 12–33, ELI: http://data.europa.eu/eli/reg/2012/1025/oj

Regulation, the effectiveness of the peer review system and Union-financed market surveillance activities and cooperation between market surveillance and customs authorities, and possibilities to further improve the cooperation between the MSAs and customs authorities.

A combination of qualitative and quantitative evidence underpins the analysis, drawing on available data and stakeholder input, based on the study developed in support of this evaluation. Certain limitations need to be acknowledged, notably regarding the short period since the Regulation became applicable, together with certain constraints related to data availability and comparability across countries. The total number of non-compliant products entering and circulating in the Single Market remains unknown, as it is not possible for market surveillance authorities to check all products in the market: consequently, the data covers only a small subset of products subject to checks. In turn, existing data on the shares of non-compliant products amongst those tested is biased towards products perceived as having a higher risk of non-compliance, as MSAs are legally mandated by the MSR to apply a risk-based approach. Consequently, while the Information and Communication System for Market Surveillance (ICSMS) - the EU reporting platform for MSA investigations and compliance findings in which authorities are required to record all in-depth compliance checks - is the comprehensive communication platform for market surveillance on non-food products and for mutual recognition for goods, it does not provide a full picture of the situation on the market, and its use by the authorities is uneven, with the JRC 2025 study finding that only 10% of all conducted investigations is recorded in the tool.[6, 7] Similar limitations apply to the data recorded in Safety Gate, the EU rapid-alert database for products posing safety risks requiring authorities to record all unsafe products. Taking those limitations into account, an assessment of the ICSMS and Safety Gate data has provided a good overview of key indicators related to the MSR's impact (see details in Annex 2). In addition, there are gaps in Member States reporting on available resources for market surveillance.

2. WHAT WAS THE EXPECTED OUTCOME OF THE INTERVENTION?

2.1 Description of the intervention and its objectives

2.1.1 Problems that the intervention aimed to address

The MSR aimed to address the problem that many products circulating on the Single Market did not comply with the rules set out in Union harmonisation legislation, causing potentially harm to consumers and users and resulting in unfair competition for law-abiding businesses. Four specific drivers were deemed to engender this problem:

i. **market surveillance throughout the EU was fragmented**, with insufficient coordination among competent authorities such as MSAs and customs authorities.
ii. MSAs were not always equipped with necessary **resources** for effective market surveillance.
iii. the **regulatory toolbox** was considered insufficient: MSAs did not have all the necessary powers to effectively deter and enforce cases of non-compliance, particularly in the context of increasingly complex supply chains, a growing volume of goods from outside the EU, and the rapid expansion of products sold online and through e-commerce.

[6] Arcipowska, A., Arcot Rajashekar, A., Capurso, V. and Robouch, P., The EU market surveillance indicators: MSA activities, collaboration and results, EC, Geel, 2025, JRC144277.
[7] This is also in part due to the fact that MSAs are obliged only to record in ICSMS in-depth compliance checks as per Article 34 of the Regulation.

iv. there were significant **knowledge and information gaps**, both among enforcement authorities and the stakeholders that were subject to market surveillance.

2.1.2 General and specific objectives of the intervention

To address these problems, the **general objective** of the MSR is spelled out in its Article 1(1):

"*to improve the functioning of the internal market by strengthening the market surveillance of products covered by the Union harmonisation legislation […] with a view to ensuring that only compliant products that fulfil requirements providing a high level of protection of public interests, such as health and safety in general, health and safety in the workplace, the protection of consumers, the protection of the environment and public security and any other public interests protected by that legislation, are made available on the Union market*"

The three **specific objectives** of the MSR to support this general objective[8] are:

1. Strengthening the enforcement toolbox, allowing MSAs to use more deterrent, effective and future-proof tools.
2. Increasing operational enforcement capacity, improving efficiency of market surveillance action, targeting of controls, and availability of resource.
3. Reinforcing market surveillance cooperation procedures, reducing fragmentation and inefficiencies.

2.1.3 The intervention logic

The above-mentioned general and specific objective set the framework for the activities, outputs and results of the intervention (see Figure 1). To pursue the specific objective of **strengthening the enforcement toolbox**, the MSR provided new powers to MSAs and to make deterrence more effective. This included, among others, the powers to require information from economic operators, carry out unannounced on-site inspections, enter premises, initiate investigations on their own initiative, and, crucially in the e-commerce field, acquire product samples under cover identity to check compliance (mystery shopping) under Article 14 of the MSR. Article 3 of the MSR provides a definition of an 'economic operator', which means the manufacturer, the authorised representative, the importer, the distributor, the fulfilment service provider or any other natural or legal person subject to obligations in relation to the manufacture of products, making them available on the market or putting them into service in accordance with the relevant Union harmonisation legislation. In Articles 4, 5, 6, 7 and 18, the MSR defined clear rights and obligations for economic operators including, for example, the obligations to cooperate with MSAs; to provide sufficient information and documentation in view of proving the conformity of the product; and to make sure that immediate, necessary, and corrective actions are taken to remedy any case of non-compliance with requirements and to mitigate any risks presented by products.

To pursue the specific objective of **enhancing the capacity and resources** of the MSAs, Article 11 requires them, firstly, to ensure that economic operators take appropriate and proportionate corrective action and, secondly, to take appropriate and proportionate measures where the economic operator fails to do so. This provision also compels MSAs to perform appropriate checks on the characteristics of products on an adequate scale, by means of documentary checks. The MSR

[8] The IA accompanying the Commission proposal for the current MSR listed a fourth objective ("*Promoting compliance with EU legislation on non-food products, improving accessibility of compliance information*"). Yet, the issue of accessibility of compliance information is dispersed throughout the provisions and mostly covered by ICSMS. In addition, Article 42.1 of the MSR, which lists aspects that the evaluation must cover, makes no reference to the accessibility of compliance information. As a result, while the Evaluation does not isolate the accessibility of compliance information as a self-standing specific objective, but it assesses it, accounting for it in the context of the MSR's general objective (*promoting compliance*) and in the context of the operation of ICSMS.

require Member States to prioritise their resources and activities market surveillance strategies (Article 13), and introduces new resources at EU level, such as the EU Testing Facilities (EUTFs; Article 21), with the aim of addressing a capacity gap in testing compliance for certain risks or product categories. Digitalisation of information was also deemed crucial. Article 34 refers to an information and communication system that was later integrated into the ICSMS in a Commission Implementing Regulation.[9] Improved capacity for controls at the borders (Articles 25 to 28), guidelines and training provided by the Commission (Articles 33 and 42) and the recovery of costs from EOs by MSAs when products were found non-compliant (Article 15) were also expected to contribute to enhanced capacity and resources leading to effective and efficient controls.

To pursue the specific objective of **reinforcing cooperation procedures**, Article 10 of the MSR requires each Member State to appoint a Single Liaison Office (SLO) to represent a coordinated position at the EU level. Cooperation between different Member States is structured by joint activities (Article 9), peer reviews (Article 12), cross-border mutual assistance when information is needed from other Member States (Article 22) and, requests for enforcement measures (Article 23). Article 32 of the MSR defines a range of tasks for administrative cooperation groups (AdCos), including, for example, the facilitation of the uniform application of Union harmonisation legislation across countries, the promotion of communication and sharing of information between MSAs, and the establishment and coordination of common projects, including cross-border joint actions. The interaction between MSAs and the Commission is coordinated by the European Product Compliance Network (EUPCN), created by Article 29. Finally, cooperation with third countries is structured by Article 35.

The implementation of the Regulation was expected to produce positive results, i.e. higher rates of compliant products, which in turn contribute to wider **impacts**, such as increased protection of health, safety, and other public interests (including the environment). This would lead to greater consumer confidence and fairer competition and level playing field for businesses, resulting in enhanced competitiveness. The achievement of these objectives depends on several types of **inputs**, including financial and human resources, existing national and EU-level processes, and technical infrastructures such as the ICSMS, the EU Safety Gate, and EU CSW-CERTEX tools. [10]

The Regulation has also been affected by **external factors**. These include developments in e-commerce, new economic models, digital technologies relevant for surveillance, rising global competition, and geopolitical tensions. The Regulation must also function in coherence with other major EU policies and legislative instruments, particularly the New Legislative Framework (NLF), but also the General Product Safety Regulation (GSPR)[11], EU Customs rules and their ongoing reform, data protection laws, the Digital Services Act (DSA)[12], and non-legislative instruments such as the Single Market Strategy and the Competitiveness Compass.

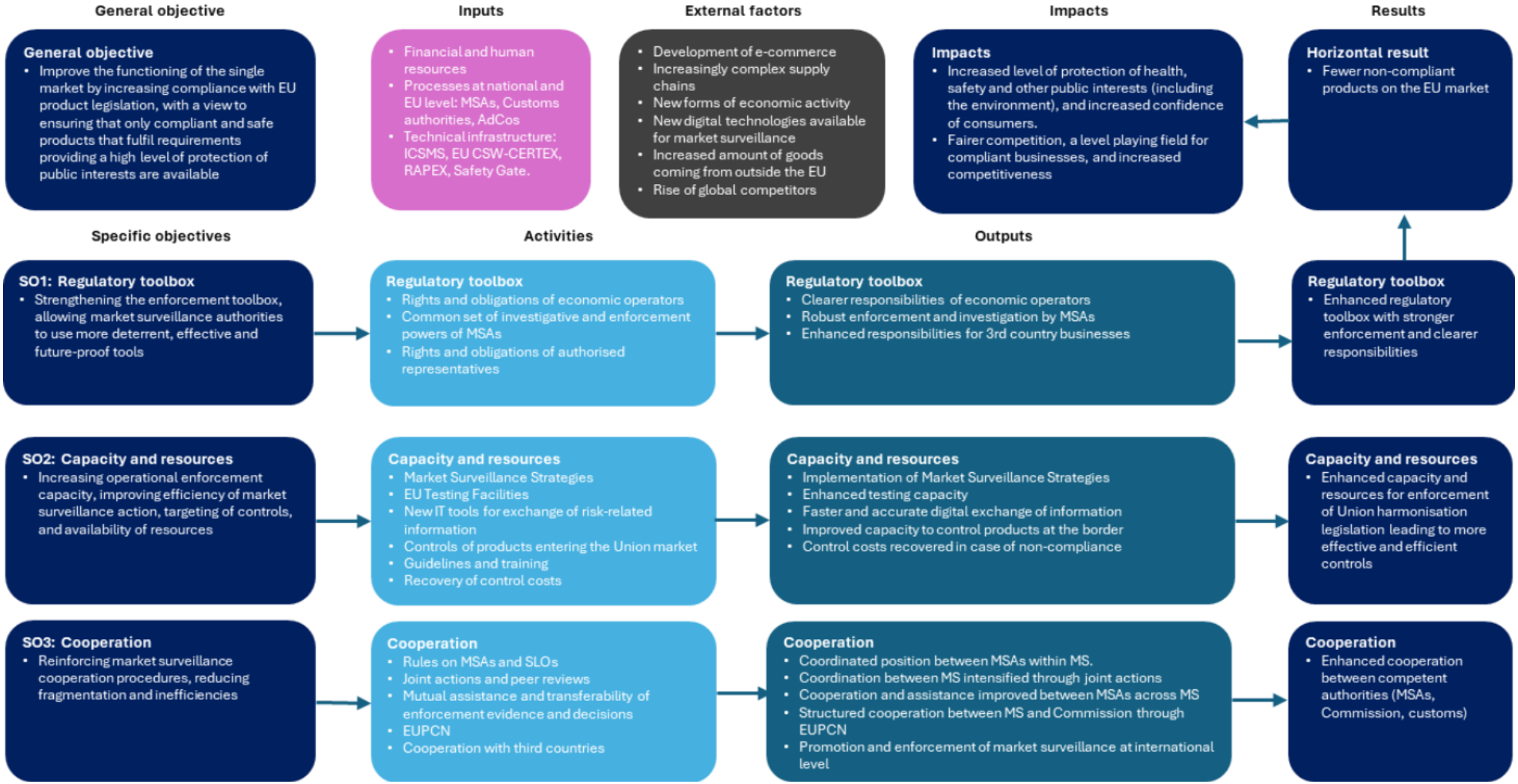
[9] Commission Implementing Regulation (EU) 2020/1668

[10] The latter is available but still not in use by Member States.

[11] Regulation (EU) 2023/988 of the European Parliament and of the Council of 10 May 2023 on General Product Safety, amending Regulation (EU) No 1025/2012 of the European Parliament and of the Council and Directive (EU) 2020/1828 of the European Parliament and the Council, and repealing Directive 2001/95/EC of the European Parliament and of the Council and Council Directive 87/357/EEC

[12] Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services and amending Directive 2000/31/EC (Digital Services Act).

Figure 1 – Intervention logic



2.2 Points of comparison

The evaluation of actual performance is to be compared to the expected results and impacts of the preferred policy option as assessed in an impact assessment accompanying the MSR proposals.[13] In particular, the points of comparison (PoC) listed the indicators identified for the monitoring of compliance for the preferred option, also based on the previous evaluation accompanying the proposal. The 2017 IA suggested a large number of monitoring indicators (15). They were all related to assessing effectiveness, and not all of them are measurable with the available tools and data. Therefore, the points of comparison selected for the present evaluation focus on effectiveness indicators that capture the three key MSR objectives and allow before-and-after comparisons. The table below provides the selected list of key PoCs, including comments on the rationale for selecting them.

Table 1 – Points of comparison

Evaluation criterion	Points of comparison	Rationale and usage	Baseline

Effectiveness	Number and outcomes of investigations carried out by MSAs	The indicator tracks changes in compliance of products (general objective), the extent to which the regulatory **toolbox** has been enhanced (SO1) and whether **capacity and resources** to perform checks increased (SO2).	• Average total annual number of inspections between 2010 and 2013 (across 15 MS) 7,493 (2017 IA).
			• No reliable baseline data on non-compliance but the 2017 IA provides sectoral estimates:
			  ○ 32% for toys,
			  ○ 47% for construction products,
			  ○ 34% for low voltage electrical equipment.

Effectiveness	Application of sanctions for non-compliance (frequency and severity of penalties applied by MSAs)	It tracks changes in the extent to which the regulatory **toolbox** has been enhanced and serves as a deterrent (SO1). Note that both the 2017 evaluation and the current report concluded that penalties remain underused. Considering the current compliance trends, a more frequent use of penalties can be seen as a positive trend.	• The 2017 evaluation found that penalty regimes were entirely national, with fines often insufficiently dissuasive. • Share of checks resulting in penalties under Article 41 in 2020 - 3.65%.
Effectiveness	Usage of joint actions and mutual assistance mechanisms by MSAs (e.g., number and outcomes of mutual assistance requests between MSAs)	Track changes in **cooperation** between MSAs (SO3).	• Average annual number of joint actions annually (7.75) between 2010 and 2017 carried out at EU level. • For mutual assistance requests, there is no quantitative baseline as a mechanism became effective only with MSR in 2021.

[13] SWD(2017) 466 final

Evaluation criterion	Points of comparison	Rationale and usage	Baseline
Effectiveness and Efficiency	Size of the market surveillance budgets	The indicator is linked to increasing operational capacity (SO2) and is used in the efficiency section on costs for MSAs.	• Total budget of approx. EUR 130 million in 2010-2013 for all countries (see REFIT evaluation[14]/ IA – Annex 11). • The average national budget for MSAs (excl. labour costs) of 5.97 million in 2014-2016 • Around 153 million EUR for the EU27 in 2022 (Arcot et al. - JRC142737).
Effectiveness and Efficiency	Number of FTEs	The indicator is linked increasing operational capacity (SO2) and is used in the efficiency section on Costs for MSAs.	• No full baseline available, but according to Arcot et al. (JRC142737), the data indicate an overall increase in Full-Time Equivalent (FTE) staff dedicated to market surveillance. • Partial data for 2019 (gathered via the data request) – total FTEs in 11 Member States that provided data ~1,743.
Efficiency	MSA costs per checks	Used in the section on Costs for MSAs to track changes in workload.	• Before Article 4 became applicable, the average time needed to perform a general check on harmonised products currently covered by Article 4 was 2.7 hours for shorter checks (i.e. not exceeding 5 hours) and 12.5 hours for longer checks.[13]
Efficiency	Costs for EOs	Used in the section on Costs for EOs to track changes in costs for businesses.	• As concerns the full cost for businesses, the expectations from the IA accompanying the MSR proposal, were that the cost of demonstrating compliance for businesses would be 0.05% of company turnover.
Efficiency	Savings from reusing information from the ICSMS	Used in the Benefits from the Union-level actions to assess the cost savings thanks to the ICSMS	• Expectations in the IA for avoided costs of approximately EUR 20 000 to EUR 1 million per year.

[14] N.B. not all EU-28 provided data: AT, CY, EE, EL, HR, LU, SI, UK, and HU excluded; REFIT evaluation - Evaluation of the market surveillance provisions of Regulation (EC) No 765/2008 (SWD(2017) 469.

Evaluation criterion	Points of comparison	Rationale and usage	Baseline
Efficiency	Average share of checks in which the costs were recovered out of total checks	This is a modified indicator, suggested in the IA - % of costs recovered by authorities, because there is no data for the original indicator	• Data for 2019-2021 (gathered via data the request) – 2.44%.
Relevance	E-commerce data (online sales), trends over time	Track changes in e-commerce	• Cross-border e-commerce revenue in Europe: EUR 227 billion (2019). • Share of harmonised products imported from third countries - nearly 30% (2016–17 Impact Assessment)
Relevance	Notifications by countries of origin and risk level	Track changes in issues with products depending on their origin and risk level	• 2,150 Safety Gate alerts (2019) • 75% of RAPEX notifications concerned imported products (2010–2016, REFIT/IA) • ICSMS existed pre-MSR but was not mandatory. 13,055 in-depth investigation records created in ICSMS in 2019. • Number of individual MSAs that created at least one ICSMS record: approximately 250 in 2019–2021.
Coherence	Conclusions on Coherence from the REFIT evaluation and IA	Track the level of coherence and follow up on any relevant conclusions	• The REFIT evaluation found that market surveillance provisions were coherent within themselves, with roles and tasks well defined and no duplication. However, it noted a lack of specificity, allowing discrepancies in national implementation. The 2017 IA SWD found no stakeholder category anticipated major coherence issues.
EU added value	Conclusions on EU added value from the REFIT evaluation	Track the level of EU added value and follow up on any relevant conclusions	• The IA identified problem drivers requiring EU-level action: fragmented enforcement, limited resources, weak deterrence, and inadequate cross-border information exchange. ICSMS existed pre-MSR but was not mandatory.

3. HOW HAS THE SITUATION EVOLVED OVER THE EVALUATION PERIOD?

3.1 Evolution of the market of products subject to the Regulation

As a horizontal legislation, the MSR covers a wide range of non-food product categories and manufacturing sectors in the EU. It applies to products subject to 70 Union harmonisation legislation listed in Annex I of the MSR (including toys, electronics, cosmetics, personal protective equipment or machinery, and to other) and to other acts specifying that the MSR applies to them (including the Artificial Intelligence Act and the Cyber Resilience Act).

The total value added of harmonised sectors grew by 2.1% from 2021 to 2024 (last available year, see Annex 6 for the sector coverage).[15] It amounted to EUR 1.1 trillion in 2024. The share of total value added by harmonised products increased from close to 61% in 2021 to 67% in 2024 (see Figure 3 A6.6 in Annex 6). Large companies account for about 72.9% of the total value added in harmonised sectors on average across the period, while medium sized enterprises add 18.9% of the value. Small and micro enterprises account for the remaining 8.1% of value added.

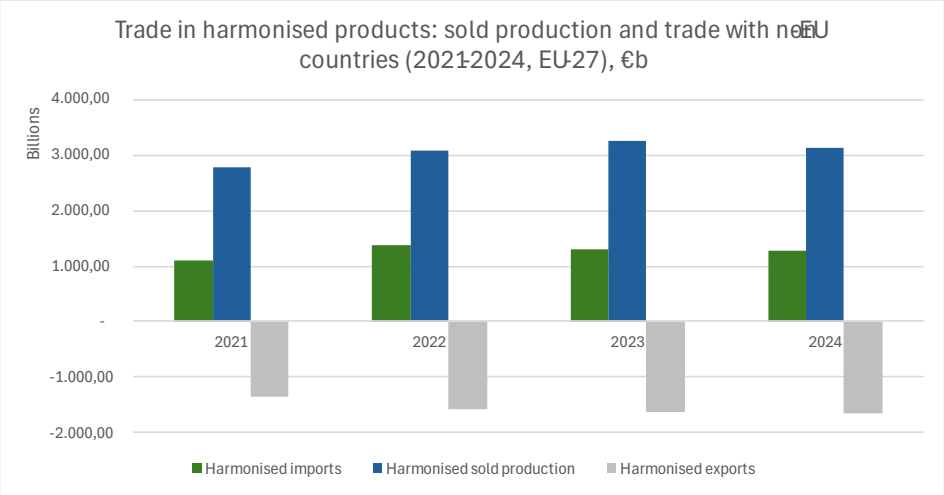
Between 2021 and 2024, the value of EU harmonised products sold[16] **in the EU increased by around 14.8% from some EUR 2.7 trillion to over EUR 3.1 trillion**. Among the harmonised products sold in the EU, the main categories are motor vehicles and their parts (18.7%), chemicals (4.4%), and metal structures and their parts (3%), as well as communication equipment, computers, and electronic components (jointly 7.6%). A further breakdown of the main product categories, based on Eurostat Prodcom data, is included in Table A6.104 of Annex IV.

Harmonised products account for around half of the total value of manufactured goods consumed in the EU (51% in 2024).[17] The total value increased from EUR 2.5 trillion in 2021 to EUR 2.7 trillion in 2024. By sector, the combined value of motor vehicles (incl. other parts and accessories), basic chemicals, metal structures and parts of structures, communication equipment, computer and peripheral equipment, and locks and hinges amounted to more than a third of the total value of harmonised products consumed in the EU in 2024.[18]

Harmonised products account for a large share of EU external trade. Harmonised imported products from third countries account, on average, for about 70% of all imports of manufactured goods over the period. The value of these products increased over the same period from EUR 1.1 trillion to EUR 1.3 trillion (16.3% increase). In addition, the value of harmonised exports accounts on average for 71.6% of the value of all exported manufacturing goods. It increased by 21.3% during this period from EUR 1.4 trillion in 2015 to EUR 1.7 trillion in 2024.[19] Pharmaceutical preparations (5.5% of total imports), communication equipment (4.9% of total imports), and motor vehicles (4.8% of total imports) rank in the top three sectors in terms of the share of the trade value of all harmonised goods. A further breakdown of the absolute value of the imports by product group and their share of total imports is presented in Table A6.16 of Annex VI.

[15] Source. Eurostat SBS [sbs_ovw_ac]. Not that 2023 was the last year with observational data available for value added by sector.
[16] Sold production refers to goods that are sold by EU based manufacturers and placed on the market.
[17] Consumption is computed as value of EU products sold in the EU minus the value of EU exports (EU products destined to third countries) plus the value of imports from outside EU. It is used as a proxy to measure the apparent consumption of goods in the EU. Eurostat Prodcom - statistics by product 2026 [ds-059358].
[18] Source: Eurostat Prodcom.
[19] Source: Eurostat Prodcom.

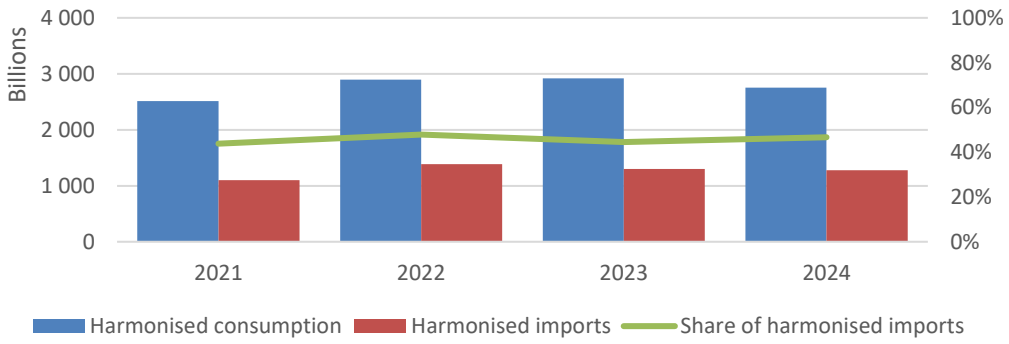
Figure 2 – Sold production and external trade of the EU27 in harmonised products (2021-2024)



Source: Eurostat Prodcom - statistics by product 2026 [ds-059358]

Between 2021 and 2024, 45.7% of the value of harmonised products consumed within the EU came from imports from non-EU countries (representing EUR 1 066 billion annually). Annual ratios grew from 43.8% in 2021 to 46.6% in 2024. Among harmonised products, imports of pharmaceutical preparations account for about 7.7%, communication equipment for about 6.9%, and motor vehicles for about 6.7% (see Table A6.15 in Annex VI). For many of the imports, China is the dominant source for imported harmonised products.

Figure 3 – Harmonised (extra-EU) imports and harmonised consumption (2021-2024, EU-27)



Source: Eurostat Prodcom - statistics by product 2026 [ds-059358]

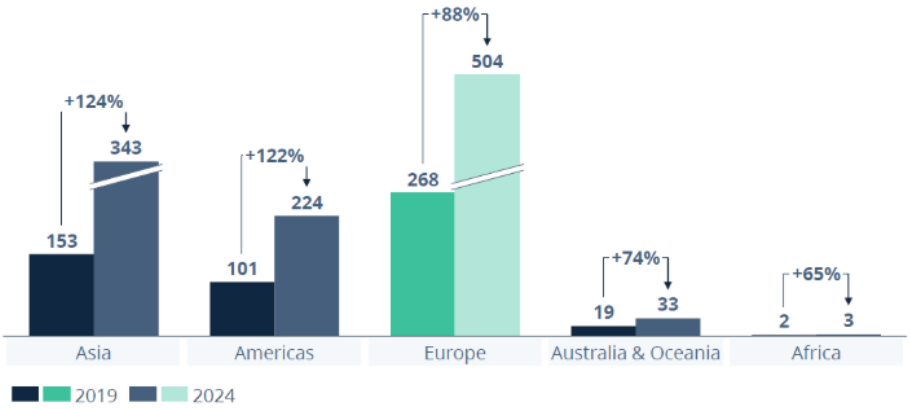
China alone accounts for 20% or more of the total value of extra-EU imports in 52 out of 85 harmonised product categories (61.2%). The US and UK follow from a wider distance (13/85 product categories or 15.3% each), followed by Türkiye (6/95 product categories or 7.1%) and Switzerland (5/85 product categories or 5.9%). In particular, China accounts for more than 50% of imports for example for computers (53.4%), communication equipment (53.8%), batteries and accumulators (78.4%) and electric domestic appliances (70.3%), as well as consumer electronics (63.8%). The country accounts for about 75.5% of imports of games and toys, and about 70% of imports of other imported goods (see Table A6.17 in Annex VI).

There are some 876,000 enterprises active in harmonised sectors.[20] Between 2021 and 2024, the number of enterprises in these sectors appears to have increased slightly by about 2.1%, from slightly over 858,000 enterprises in 2021. The number of enterprises in harmonised sectors amounts to about 42% of all enterprises in the manufacturing sectors. 95% of enterprises in the harmonised sectors are SMEs, while the remaining 3.8% are medium enterprises. Only 0.8% of the enterprises in the harmonised sectors are classified as large (more than 250 employees).

Enterprises in the harmonised sectors employ close to 16.3 million people.[21] This number has grown by 9% from 2021 to 2024. On average, 54.9% of manufacturing employees work in harmonised sectors each year during the observed period. Micro and small enterprises account for 25.2% of the people employed, while medium enterprises in harmonised sectors account for another 22%. Large companies in harmonised sectors account for about 53% of the total employment in those sectors (see also Annex VI).

In addition, Europe has become the leading region for international e-commerce. The revenue from products sold through e-commerce increased by 88% from EUR 227 billion in 2019 to EUR 427 billion in 2024, marking the largest nominal increase across all regions (EUR 236 billion).[22]

Figure 4 – Global cross-border e-commerce revenue growth, billion USD



Source: ECDB as of March 2025.

The increasing volume of products bought online and imported into the EU is also visible through the number of small packages (e-commerce low value consignments of less than 150 EUR) reaching 5.9 billion packages in 2025, which is three times higher than in 2022[23]. These small packages make up 97.9% of all items recorded at the borders, while accounting for merely 2.1% of the trade value. The vast majority of small-value items purchased online from outside the EU, both in terms of value (78%) and volume (93%), originate from China[24]. Among EU Member States, Belgium led the market with 1.37 billion parcels, followed by Hungary with 974 million and the Netherlands with 936 million. France also recorded substantial volumes at 862 million parcels, while Germany, Italy, and Spain handled 475 million, 399 million, and 2020 million parcels, respectively. Ireland (159 million), Poland (118 million) and Czechia (106 million) also registered more than 100 million parcels each. Together, these ten countries represented 95.5% of the total EU

[20] Due to gaps in historical data, a 2-digit NACE code granularity was used for the period 2015-2020 for the all-manufacturing sectors, and the 3-digit level was used for the period 2019-2024 for harmonised sectors, as opposed to the 4-digit selection for product level analysis.
[21] Eurostat Structural business statistics (SBS).
[22] ECDB. Available at: Cross-Border E-Commerce Report: Crossborder Online Shopping.
[23] Customs Union in Numbers 2025. Available at: https://taxation-customs.ec.europa.eu/customs/eu-customs-union-facts-and-figures/goods-bought-online_en
[24] Ibid. 23.

parcel volume in 2025, highlighting the concentration of logistics activity within Europe's largest e-commerce and distribution hubs.

In Europe 53% of total e-commerce revenue generated from shops and 47% from marketplaces (incl. first-party and third-party sales).[25] In 2024, Amazon was the biggest cross-border platform in terms of revenue across Germany, France and Italy by a considerable margin.[26] Other non-EU platforms, notably Chinese platforms such as Temu, Shein and AliExpress, also feature prominently among leading cross-border marketplaces.

Country-specific data suggest that consumer products, such as textiles, consumer electronics and household goods, are particularly prominent in e-commerce.[27] EU-wide data confirms that clothing (including sportswear), shoes and accessories were the most prominent products purchased online in 2024, with 45% of people making these purchases in the previous 3 months.[28] These were followed by cosmetics and wellness products (20%), and furniture and home accessories or gardening items (19%).

3.2 Current state of play

3.2.1 Organisation of market surveillance at the national level

Across the EU, all Member States have established governance arrangements for market surveillance that formally align with the requirements of the MSR. Every Member State has designated multiple MSAs, authorities in charge of the control on products entering the Union market, as well as, pursuant to Article 10 of the MSR, a Single Liaison Office (SLO), whose role is to coordinate activities of MSAs in a Member State.

The MSR does not prescribe the way Member States should organise market surveillance. The number and the type of MSAs among whom competences and powers are shared vary across countries. Overall architectures range from fully centralised to partly decentralised systems, reflecting different political structures and institutional traditions across the Union. Seven Member States have designated, in addition to central authorities, MSAs operating at regional level. Based on available information, there are currently 914 MSAs in the EU.[29]

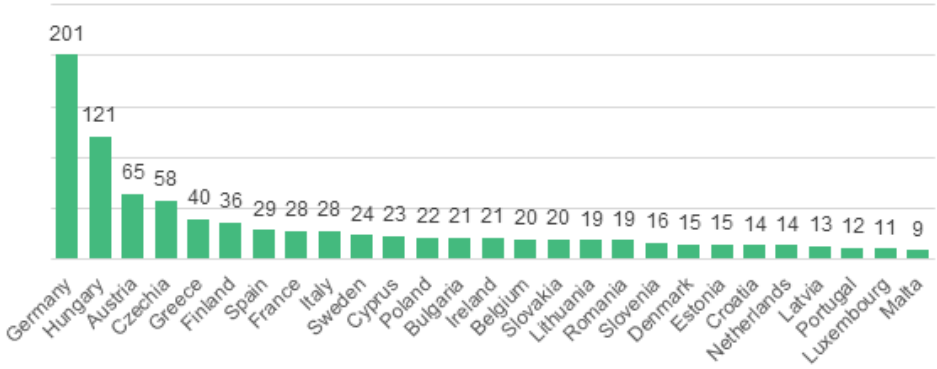
However, notable changes have been implemented to the organisation of market surveillance in several Member States since the MSR entered into force. Some countries, such as Italy, Poland, and Romania, have substantially amended their governance structures, clarifying responsibilities between internal market surveillance and border controls or consolidating the coordination function of central authorities. Others, including Germany, the Netherlands and Sweden, have maintained their existing organisational framework and made only smaller targeted adjustments to align processes and responsibilities with revised MSR requirements.

All Member States have adopted national market surveillance strategies for the 2022-2025 period, pursuant to Article 15 of the MSR, with the exception of Hungary, which has not adopted its strategy, and as such has not submitted it to the Commission.[30]

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[25] ECDB. Available at: Cross-Border E-Commerce Report: Crossborder Online Shopping.
[26] ECDB as of March 2025.
[27] Handelsverband Deutschland – Onlinemonitor 2025. Available at: https://einzelhandel.de/online-monitor.
[28] Eurostat [isoc_ec_ibgs dataset].
[29] Available at : https://webgate.ec.europa.eu/circabc-ewpp/d/d/workspace/SpacesStore/92cd1259-6115-40fa-8d19-2259f28d1a42/download.
[30] The duty of the SLO to communicate the national strategy via ICSMS is included in Act No. LXXXVIII of 2012 on the market surveillance of products (as revised in 2020), but no further information has been found during the desk research on its preparation or use.

Figure 4 – Number of MSAs per country



Member States have also fulfilled MSR requirements to formalise or reinforce cooperation between MSAs, as well as between MSAs and the customs authorities, within their countries, and to set up committees or agreements between them to improve information flows and collaboration on risk profiles and on cases, with updated mandates of authorities where needed. The newly appointed SLOs carry out an important coordination function, aggregating information and representing the common position of MSAs at the EU level.

3.2.2 Penalty regimes and other sanctions

All Member States have established penalty frameworks to support the enforcement actions of their MSAs, as notified to the Commission[31]. The overall strictness – and resulting deterrent effect – of the national penalty frameworks varies significantly. When comparing the legal ceilings for administrative fines and the availability of criminal sanctions, clear differences emerge between countries. Eight Member States (Belgium, Cyprus, Estonia, France, Germany, Ireland, Luxembourg and Spain) have set relatively high ceilings for administrative fines – reaching or exceeding EUR 100,000 - and foresee criminal liability of responsible economic operators for repeated, intentional or serious violations. Denmark also has a strict regime that allows for criminal sanctions, without ceilings for administrative fines. Finland set a general maximum fine level for legal persons of EUR 30,000.

A large number of Member States (Austria, Croatia, Czechia, Italy, Hungary, the Netherlands, Poland, Romania, Slovakia, Slovenia and Sweden) **rely on administrative fines only,** generally ranging between EUR 10,000 and EUR 50,000, without foreseeing criminal sanctions applicable for infringements in aggravated cases of marketing unsafe or non-compliant products. Finally, the administrative fines in Bulgaria, Greece, Latvia, Lithuania, Portugal and Malta generally remain below EUR 10.000 with no possibility to impose criminal sanctions.

Penalty regimes in most Member States are defined in several pieces of legislation: at a general level in a national act on product safety and conformity, or on market surveillance, but also in several product-specific legislation. Therefore, the fines may depend on the product category (toys, electrical goods, chemicals).

[31] State of play: 19 May 2026.

4. EVALUATION FINDINGS (ANALYTICAL PART)

4.1 To what extent was the intervention successful and why?

This chapter outlines the performance of the MSR in terms of its effectiveness (fulfilling expectations and meeting the objectives), efficiency (proportionality of its cost and benefits) and coherence (internal and external).

The evaluation matrix included in Annex 3 lists the data and information sources, as well as the assessment methods of the general and specific objectives of the MSR. The methods used for assessing the specific objectives are desk research including legal mapping, targeted survey were also used as a source of information when relevant.

4.1.1 Effectiveness

4.1.1.1 To what extent has the MSR contributed to achieving its general objective?

Overall, the Regulation has been effective in strengthening market surveillance activity and reporting, but its contribution to reducing the presence of noncompliant products on the market has been limited.

The share of non-compliant products among all products entering and circulating in the Single Market cannot be measured with precision, but existing data indicates that non-compliant products are widespread. More precisely, the total number of non-compliant products entering and circulating in the Single Market remains unknown because it is not possible for MSAs to check all products in the market: consequently, the data only cover a small subset of products subject to checks. In turn, existing data on the shares of non-compliant products amongst those tested is biased towards products perceived as having a high risk of non-compliance, as MSAs are legally mandated by the MSR to apply a risk-based approach, prioritising their resources and actions based on factors such as potential hazards, past records of economic operators, customs risk profiling and information from consumer complaints or media reports. Taking the data limitation described above and in section 1.1. into account, existing evidence from public authorities indicates that non-compliant products remain widespread in the Single Market, with particularly high rates among high-risk products and products originating from third countries.

Notwithstanding these limitations, since the Regulation entered into force, available data shows that for products subject to investigations, the share of non-compliant products remain high. Since July 2021, the MSR requires Member States to use ICSMS for reporting data on in-depth checks of compliance. ICSMS data indicates that over 50% of investigated products were found non-compliant, with rates fluctuating during 2019–2025 between 50% and 58% (although it does not provide a full picture of the situation on the market, as the JRC 2025 study finding that only 10% of all conducted investigations is recorded in the tool).

Overall, compliance rates vary markedly by sector, but where investigation activity is substantial, non-compliance levels remain consistently high, pointing to widespread compliance concerns. A JRC study reports that for sectors which have a high number of investigations, non-compliance is found in approximately 60% of cases.[32] This trend is also evident in the assessment of the ICSMS data. Between 2021 and 2025, the sectors with the highest number of investigations also exhibit high levels of non-compliance (see Annex VI).

[32] Arcipowska, A., Arcot Rajashekar, A., Capurso, V. and Robouch, P., The EU market surveillance indicators: MSA activities, collaboration and results, EC, Geel, 2025, JRC144277.

The ICSMS data also shows increases in non-compliance rates in key sectors between 2021 and 2025. In the toys sector, the non-compliance rate rose by 17 percentage points, from 42% in 2021 to 59% in 2022, and subsequently remained high, reaching 61% in 2025. Similar upward shifts are observed in other consumer-oriented sectors such as cosmetics. The low voltage sector, on the other hand, while levels remain high, has seen a decrease in non-compliance rates, dropping from 60% in 2020 to 46% in 2025 (see Annex VI).

Available evidence suggests that products imported from third countries have a higher share of non-compliant products than products produced in the EU. ICSMS 2021-2025 data shows that the non-compliance rate stands at 62% for non-EU products compared to 47% for EU ones. The non-EU products accounted for almost half of all non-compliant products found and registered in ICSMS, against 20% for EU products and 30% for unknown-origin ones. Given that imported products accounted for about 45.7% of harmonised products on the market between 2021 and 2024 (see Section 3.1), this signals higher levels of non-compliant products imported from third countries compared to products produced in the EU. Similarly, most products found unsafe come from third countries. While data in Safety Gate - the EU rapid-alert database for products posing safety risks requiring authorities to record all unsafe products - faces similar data limitations as ICSMS, 57% of all products flagged as unsafe in Safety Gate in 2021-2025 originate from outside the EU, compared to 32% from EU countries (and 10% unknown).

In addition, the exponential growth of products imported from third countries through e-commerce is a major channel through which non-compliant products continue to reach the EU market. According to the most recent Commission data, around 5.9 billion low-value consignments entered the EU in 2025, which is three times more than in 2022. This coincided with the rapid growth of certain online marketplaces. In addition, most of these imports originate in China. While customs authorities have increased the number of product compliance controls and resulting suspensions and refusals to release products for free circulation in absolute terms, the rate of interventions has declined relative to the overall volume of imports, indicating a widening gap between enforcement capacity and the volume of imported goods. In fact, it is noted that in 2024, customs controlled the compliance of only 0.0082% of all products imported due to the large quantities being imported.[33] Out of the inspected products, 62% were suspended for suspicions of non-compliance (0.0051% of all imported products), and 16% were refused (0.0013% of all imported products). This results in non-compliant products entering the Single Market.

In fact, when focusing on online sales only, most products found unsafe come from third countries and this ratio is increasing. The ratio for non-EU alerts in Safety Gate stands at 78% in 2025 (compared to 9% from the EU, and 13% of unknown origin), with the share increasing since the MSR entry into force (68% in 2021). Between 2021 and 2025, unsafe non-EU products are heavily concentrated in toys (16% of all alerts) and electrical appliances and equipment (10%). In both product groups, the share of alerts concerning products from third countries increased over the period. For toys, the share increased from 92% to 94%, while for electrical appliances and equipment, the share increased from 92% to 97%. Motor vehicles, which accounted for another significant share of alerts (13%) and where alerts mostly concern products from EU and EEA countries, also show that the share of alerts for products from third countries increased from 24% in 2021 to 29% in 2025. Similarly, the 2025 Priority Control Area (PCA) action between all 27 customs authorities and 108 relevant MSAs, focused on products offered on four major

[33] EC, Directorate-General for Taxation and Customs Union. (2025). Report on controls on products entering the EU market with regard to product compliance in 2024. Publications Office of the EU. Available at: https://doi.org/10.2778/4250149

marketplaces, found that 65% of inspected e-commerce products failed to meet EU product requirements, which is above the 55% average non-compliance rate recorded in ICSMS over 2021–2025.[34]

Stakeholders also perceive that most products sold online are not compliant with EU product rules. According to surveyed MSAs (N = 146), when asked what proportion of products placed on the EU market which they inspected were compliant, responses reveal a clear contrast between offline and online channels. For offline inspections, MSAs predominantly reported low levels of non-compliance, with more than four-fifths estimating that 40% or fewer of inspected products were non-compliant. By contrast, perceptions of online sales point to significantly higher non-compliance, with over half of respondents estimating that more than 40% of inspected online products were non-compliant, while 36% of respondents reporting very high non-compliance rates of greater than 60%.

In sum, while a causal relation between a rise in third-country imports, notably through e-commerce, and the number of non-compliant products cannot be proven due to data limitations, existing evidence from various sources points to a strong link between imported products and non-compliant products. As the share of investigations finding non-compliant products remains very high, particularly among imported products, while the number of number of imports has increased, the absolute number of non-compliant products circulating on the market is likely to have increased.

While it is not possible to identify the portion of responsibility that may be attributed solely to the MSR for the share of non-compliant products circulating on the Single Market, recent evaluation study indicates that the Regulation does not effectively contribute to the prevention of non-compliant products entering and circulating in the EU Single Market. While the effectiveness of market surveillance has a causal link with the number of non-compliant and unsafe products entering and circulating in the Single Market, the exact contribution of the inefficient market surveillance cannot be quantified, as the MSR is only one element of a wider framework establishing requirements for products placed on the EU single market. Despite these limitations, the Evaluation of Article 4 finds that MSAs continue to face significant difficulties in effectively contributing to preventing the entrance and circulation of non-compliant products in the EU. This is confirmed in the results of the public consultation, where over half of respondents (55%) found the regulation to be ineffective in preventing non-compliant products from reaching the market (N=154). [35]

4.1.1.2 To what extent has the MSR improved health and safety of consumers?

While the MSR has contributed to improving product compliance and safety, consistently high levels of non-compliant and risky products pose risks to consumers' health and safety.

Despite the entry into application of the MSR, consistently high levels of non-compliant and risky products continue presenting risks to consumers' health and safety. The analysis above outlines the persistent presence of non-compliant products on the market. Yet a substantial subset of these products poses a threat to the health and safety of consumers. While accounting for data

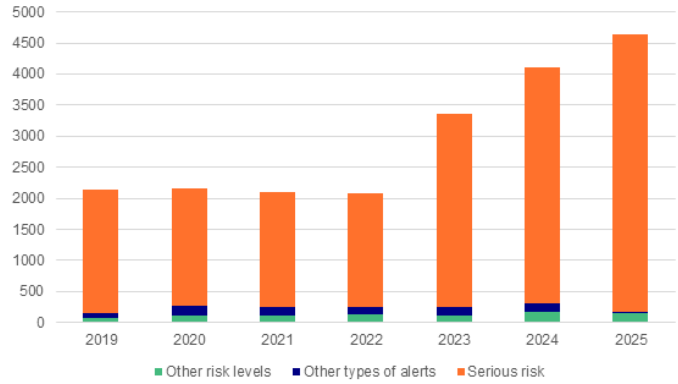
[34] EC. (2025). E-commerce: Product compliance and safety (Priority Control Area Report). Directorate-General for Taxation and Customs Union. Available at: https://taxation-customs.ec.europa.eu/document/download/42c872b9-a4ce-455b-8b5f-91cd76bd11bb_en?filename=PCA.pdf

[35] This pattern was particularly pronounced among business associations (64%, N=70), companies/businesses (50%, N=22) and consumer organisations (83%, N=6). Public authorities generally provided more moderate assessments, with 40% (N=45) considering it ineffective and 44% moderately effective.

limitations (see Section 1.1), ICSMS data indicate that over the period 2021–2025, around one third (33%) of non-compliant products posed a risk of some kind, with nearly one fifth (19%) assessed as presenting a high or serious risk. This is confirmed by the results of the public consultation, where the dominant view of the respondents is that the MSR did not ensure full respect for consumer protection (47%, N=154). Stakeholders present a similar view in the targeted consultation, with the dominant view of 44% of respondents (N=275) claiming that MSR did not ensure the full consumer protection (33%, N=274).[36]

Taking into account data limitations, the number of alerts registered on the Safety Gate system has increased over the time period, growing from 2 150 alerts in 2019 to 4 645 alerts in 2025, with the vast majority of these alerts deemed to carry potentially a serious risk. While this upward trend can also indicate a growing detection capacity among national authorities, it demonstrates a persistent presence of unsafe non-food products on the EU market. This is confirmed by research conducted by the European Consumer Organisation (BEUC), revealing that out of 250 products purchased online and tested, 66% were unsafe.[37]

Figure 5 – Safety Gate alerts (2019-2025)



Source: Safety Gate[38].

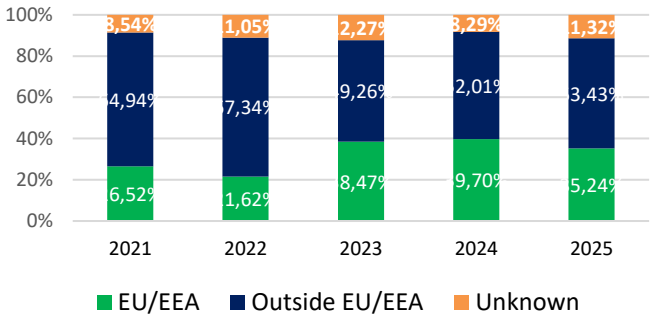
Reported data suggest that most alerts concern products coming from outside the EU[39]. Although the proportion of alerts linked to non-EU/EEA countries has decreased slightly over the period, this decline is offset by the increase in alerts where the product origin is unknown. Overall, the share of alerts involving non-EU/EEA countries remains high at approximately 60.02%, with 45.75% of all alerts linked to China as country of origin during the period 2019-2025[40]. The majority of 'serious risk' alerts originate from countries outside the EU/EEA.

The presence of non-compliant and dangerous products generates substantial social and economic costs for consumers. With regards to social costs, it has been estimated that around 15% of product-related injuries and premature deaths in the EU, corresponding to roughly EUR 11.5 billion in associated costs, could be avoided if products placed on the market complied with

[36] Disagreement was most pronounced among consumer organisations (83%, N=6), EU and national business associations (with 48%, N=26 and 50%, N=26, respectively) and other authorities responsible for product safety or compliance (43%, N=21). MSAs show a more mixed with 30% agreeing, 26% disagreeing, and 33% remaining neutral on the MSR ensuring full respect for consumer protection.
[37] BEUC, 2021, Isit safe to shop on online marketplaces? Available at: https://www.beuc.eu/sites/default/files/publications/beuc-x-2021 004_is_it_safe_to_shop_on_online_marketplaces.pdf
[38] Safety Gate 2025 – Directorate-General for Justice and Consumers (DG JUST)
[39] BEUC – The European Consumer Organisation (16 April 2025). "New data on unsafe products should lead to regulatory enforcement and update, consumer organisations warn." See here.
[40] Safety Gate statistical tool, https://ec.europa.eu/safety-gate/#/screen/pages/statistical

applicable safety requirements.[41] Considering persistently high rates of non-compliant and unsafe products reported by MSAs, it is expected that the consumer detriment have not changed significantly since 2019.

Figure 6 – Country of origin of alerts



Source: Safety Gate[42.]

4.1.1.3 To what extent has the MSR contributed to fairer competition, a level playing field and increased competitiveness?

Though the MSR has made some progress in enhancing regulatory consistency across the Member States, the remaining difficulties in enforcing Union harmonisation legislation, in particular vis-à-vis e-commerce imports, undermines fair competition within the Single Market, as operators failing to comply with EU safety standards can avoid the costs associated with developing high-quality and safe products.

An Evaluation Study on the implementation of Article 4 highlights that the MSR aligned product compliance obligations across Member States, thereby contributing to fostering the level playing field and removing competitive distortions caused by divergent national approaches.[43] By harmonising product compliance responsibilities of economic operators across Member States, it reduces regulatory fragmentation enhances consistency.

However, its impact is constrained by significant enforcement challenges, notably vis-à-vis non-EU economic operators, creating a competitive disadvantage for EU-based operators. While legitimate EU businesses bear the full cost of compliance and are likely to face consequences if they breach EU product rules, non-EU companies are likelier to operate with limited exposure to financial or legal consequences, due to the fact that MSAs face difficulties in enforcing the rules on non-EU-products. The fact that non-compliant non-EU operators avoid some of these costs while still accessing EU consumers, creates an uneven competitive environment. In some sectors costs related to conformity assessment, testing, documentation and regulatory obligations, can represent up to 40% of a product's price.[44] This is substantiated by the recent European Parliament (2023) study[45] finding that gaps in market surveillance create unequal competitive conditions that distort the level playing field in the Single Market. Similarly,

[41] SWD(2021) 168 final. See here
[42] Safety Gate 2025 – Directorate-General for Justice and Consumers (DG JUST)
[43] European Commission, (2025) Evaluation study on the implementation of Article 4 of Regulation (EU) 2019/1020 on market surveillance and compliance of products.
[44] SWD(2017) 466 final.
[45] European Parliament. (2023). Market surveillance for effective consumer protection in the EU: The role of Market Surveillance Authorities and their cross-border cooperation. Policy Department for Economic, Scientific and Quality of Life Policies.

Ruohonen (2021)[46] argues that enforcement gaps and the increasing inflow of non-compliant products-particularly through globalised supply chains-undermine the effectiveness of EU product safety rules and create conditions for unfair competition within the Single Market. Finally, this is confirmed by the results of the public consultation where 65% of respondents (N=154) disagrees that the Regulation brought level-playing field in the Single Market.[47]

4.1.1.4 To what extent is the regulatory toolbox strengthened, establishing rights and obligations, and conferring powers to MSAs to use more deterrent, effective and future-proof tools (SO1)?

While the MSR has strengthened the regulatory toolbox at disposal of MSAs to enforce Union harmonisation legislation, it remains incomplete, particularly with respect to products imported from third countries and sold online. The main constraint is the limited enforceability of Union harmonisation legislation in complex, cross-border and online supply chains. The current regulatory framework does not enable MSAs to effectively detect and address instances of product non-compliance due to three main factors: i) difficulty in identifying the responsible economic operator for the products at issue; ii) insufficient product compliance responsibilities of economic operators commensurate to their role in the supply chain; and iii) lack of powers of MSAs to enforce such rules and responsibilities.

- **To what extent are the powers of MSAs adequate to effectively detect and address product non-compliance?**

The MSR has granted MSAs across the EU certain market surveillance powers, covering investigation and enforcement. Yet these powers are not used consistently and applied effectively across different Member States. Moreover, they turned out to be insufficient to effectively address non-compliance of products, notably in the area of e-commerce.

MSAs make use of the investigative powers granted by MSR routinely as part of day-to-day surveillance, although some powers are applied less frequently. Compared to the Regulation 765/2008 where powers of MSAs were described more generally, MSR spelled them out in more details. Targeted survey results from MSA (N=143) show that MSAs do not use all enforcement powers to the same extent. Powers related to information gathering, on-site inspections and carrying out investigations are used most routinely as they form the core of day-to-day market surveillance activity. By contrast, enforcement powers to request corrective actions are regularly used, although given ineffectiveness of enforcement action on third country operators, especially in cases where an economic operator is established in the EU and cooperative. The least frequently used powers are product destruction (as the power is limited to products inspected at the border), undercover sampling ("mystery shopping"), or the systematic imposition of penalties. Regarding the powers against online offers, MSAs report that they most frequently request the removal of individual listings by online marketplaces, while the power to restrict access to online interfaces is less used.

Before the entry into application of the MSR, market surveillance powers differed amongst Member States.[48] The 2017 IA highlighted that MSAs' powers were unevenly distributed within Member States and across the EU. Investigative powers were widely available, but their scope

[46] Ruohonen, J. (2022). A review of product safety regulations in the European Union. International Cybersecurity Law Review, 3(2), 345–366.

[47] This view was particularly pronounced among businesses and businesses associations (N=92) and NGOs/consumer organisations (N=10), with 72% and 70% of respondents expressing disagreement or strong disagreement, respectively. Public authorities (N=45) provided a more mixed assessment: 51% disagreed or strongly disagreed, while 22% agreed that the Regulation had contributed to a level playing field.

[48] European Parliament (2023), Market surveillance for effective consumer protection in the EU. The role of Market Surveillance Authorities and their cross-border cooperation.

varied across product sectors. In this regard, one of the main objectives of the MSR was to establish a minimum standard of market surveillance powers.

Regarding the effectiveness of these powers, MSAs largely consider their existing powers as effective, notably when applied to the products sold in a traditional way. A large majority of authorities (73%, N=136) consider the powers to require economic operators to bring a product into compliance to be effective, notably when comes to the power to require information and documentation from economic operators (74%, N=137), to carry out unannounced inspections and physical checks (80%, N=136), to initiate investigations on their own initiative (85%, N=136), to destroy the product or render it inoperable (70%, N=135), to require economic operators to alert end users at risk (68%, N=136), or to prohibit or restrict the sale of a product (86%, N=137).

However, enforcement powers targeting non-compliant products sold online are seen as ineffective. Targeted survey data from MSAs show that these powers (such as requesting content removal related to the product, requiring warnings to be displayed, or restricting access to an online interface) are considered the least effective overall, with less than half of respondents (49%) considering them effective, 13% expressing a neutral opinion, and 21% considering them ineffective. These requests oftentimes result only in a temporary removal of a product, as the non-compliant product frequently reappears under slightly modified listings, different seller accounts, or on other marketplaces. This pattern is consistently documented across multiple independent sources. Investigations by BEUC show that, even where online platforms comply with removal requests, dangerous or non-compliant products often remain available through alternative listings[49]. Similar conclusions are drawn from industry-led exercises involving coordinated mystery shopping of toys on major online marketplaces[50].

With regard to the power to require information society service providers to restrict access to an online interface, evidence shows mixed views among MSAs. Article 14.4(k) MSR confers on MSAs the power to require OMs to remove product offers only as a matter of last resort and only in cases concerning products presenting serious risk. If such an order is not complied with, MSAs can require information society service providers to restrict access to the online interface. The GPSR further empowers MSAs to remove offers of products found unsafe and to require the OMs to remove all identical offers of an OMs for a prescribed period of time. However, these powers are not applicable to products found non-compliant for reasons other than safety. As noted by a CASP report, the powers are potentially strong enforcement instruments where no other effective means are available.[51] At the same time, a German national case on DNS blocking[52] highlights that this power is cumbersome and difficult to apply in practice. In addition, it does not prevent the continued sale of non-compliant products, which often reappear through alternative domains, platforms or sellers. This results in a limited use of the power, as confirmed by a survey conducted in the framework of the EUPCN,[53] showing that only around 21% of MSAs reported having used these powers. Feedback from MSAs consistently indicates that threshold required to demonstrate a "serious risk" is burdensome and legal procedures lengthy.

[49] BEUC, Unsafe and illegal activities online, see here.
[50] Toy Industry of Europe (2025) The online toy safety gap – one year on, available at https://www.toyindustries.eu/the-online-toy-safety-gap-one-year-on/.
[51] CASP 2022 - Online market surveillance Report.
[52] Tübingen Regional Government Office (2023), DNS blocking of websites, shared.
[53] EUCPN Survey of Market Surveillance Authorities (MSAs) in the European Union on Online Trade and Dropshipping, Subgroup on Products sold online, shared.

In fact, MSAs face persistent difficulties in using their powers relating to goods manufactured by non-EU manufacturers. This is confirmed by the results of the public consultation, with 82% of respondents (N=154) across stakeholder groups agreeing that the current market surveillance framework is overall not fit for the purpose of tackling challenges posed by e-commerce.[54] In addition, 65% of 154 respondents of the public consultation agree that non-compliant products imported from third countries via e-commerce are not prevented from entering the Union market.[55] The powers thus have little deterrent effect discouraging economic operators from placing non-compliant products on the Single Market. MSAs note that the legal framework is considered too restrictive, as their powers are in some cases limited to cases of serious risk, while non-compliant products would not be tolerated in physical retail settings.

Evidence shows that while the power to acquire product samples in an offline setting is used and generally effective, the power to conduct so-called mystery shopping – acquiring samples under a cover identity – is rarely effective in practice. Regarding the power to purchase test samples, according to MSA survey responses, offline sampling is widely used and operationally effective (76%, N=136). In contrast, MSAs are more divided on mystery shopping, with less than half of the respondents agreeing or strongly agreeing that it is widely used and operationally effective (48%, N=136), and 17% neutral and 16% disagree or strongly disagree. When asked about challenges with mystery shopping, targeted survey responses indicate that its effectiveness is hampered by a combination of legal, operational, and resource-related factors, particularly when carried out online.

The power to impose penalties is rarely and inconsistently used. As found in the Article 4 Evaluation[56], MSAs lack the legal power to impose penalties on fraudulent economic operators outside the EU. In fact, several Member States report that they do not collect any penalties at all[57]. This leads to weak deterrence effect of the MSR, also evidenced by public consultation, where only 25% of respondents (39 out of 154) found the penalty regimes laid down by the MSR for non-compliant products to be dissuasive. Finally, based on the MSA responses to the targeted survey, current penalty collection rate is estimated at about 50% (N=150), with domestic collection working well in some Member States, while cross-border collection and collection of economic operators located outside the EU is near-zero.

- **Use of corrective measures by MSAs**

Overall, MSAs generally require economic operators to take appropriate and proportionate corrective actions under Article 16, but their ability to enforce remains uneven, especially when economic operators are non-existent, uncooperative or located outside the EU.

Pursuant to Article 16 of the MSR, MSAs - when they find that a product subject to Union harmonisation legislation is liable to compromise the health or safety of users or does not conform to such legislation - must without delay require the relevant economic operator to take appropriate and proportionate corrective action to bring the non-compliance to an end or to eliminate the risk.

[54] There is a broad consensus across the different stakeholder groups that the current framework is not fit for purpose.
[55] Respondents had a negative opinion of the effectiveness of customs authorities' controls at EU borders, especially regarding the denial of entry of non-compliant products entering the EU through e-commerce: 101 out of 154 respondents (65.6%) (strongly) disagreed with the effectiveness of controls on such products. This view was shared across the main stakeholder groups, with 84% of business associations, 59% of companies/businesses, and 42% of public authorities disagreeing or strongly disagreeing that such controls denied entry to non-compliant or dangerous products.
[56] European Commission (2024), Evaluation study on the Implementation of Article 4 of Regulation (EU) 2019/1020 on Market Surveillance and Compliance of products.
[57] MSR Evaluation study, based on data provided by MSAs.

Corrective actions that MSAs may require economic operators to take include rectifying formal non-compliance, preventing the sale of the product on the market, withdrawing or recalling it immediately, destroying it or otherwise rendering it inoperable, affixing to the product warnings of the risks that it might present, or alerting end users. The MSR contemplates that economic operators may take voluntary measures, that is, corrective actions not required by MSAs. If an economic operator fails to take appropriate corrective action or where the non-compliance or the risk persists, the MSR grants MSAs itself the power to prohibit or restrict the product or to order that it is withdrawn or recalled.

Over 2019-2025, MSAs have requested economic operators to take more mandatory measures where they have not done so voluntarily, but the share of cases where MSAs requested no measures is predominant, reflecting difficulties in identifying responsible economic operators. The share of all investigations recorded in ICSMS requiring at least one compulsory corrective measure rose from 22% in 2019 to 26% in 2025 (taking data limitations into account). In contrast, fewer voluntary measures were taken by economic operators reflecting decreasing willingness to take measures voluntarily, falling from a peak of 21% in 2020 to just 9% in 2025. However, the share of cases where no measures were requested remains predominant with around 60% over 2021-2025. This reflects difficulties with identifying responsible economic operators. According to JACOP 2024 report, among corrective measures taken by the authorities, requests to the EOs to change/improve the products were the most common (21%), followed by withdrawals (15%), requests to mark a product with warnings (14%) and recalls (13%). **In terms of effectiveness, evidence shows that corrective actions are generally effective and implemented when authorities request them to be taken by clearly identifiable EU-established economic operators (see Annex 6 for more details).** Targeted survey replies indicate that corrective actions are generally perceived as effective. A clear majority of respondents to the targeted survey states that market surveillance measures bring non-compliance to an end (65%, N= 276)[58] and that corrective actions requested by authorities are usually implemented by economic operators (64%, N=271).[59]

However, limitations in timeliness and enforcement reach can be observed. The JACOP report highlights that enforcement procedures are often slowed by administrative complexity, due-process safeguards and national procedural requirements, which can reduce the deterrent effect of corrective actions, especially in rapidly evolving markets.

Effectiveness of corrective measures is further weakened in cross-border contexts. Around a third of survey respondents (30%, N=273) consider that measures adopted in one Member State are effectively applied in other Member States.[60] MSAs flag that cross-border enforcement relies on voluntary cooperation and informal follow-up, and that measures issued nationally do not result in equivalent action in other Member States, even when information is shared via ICSMS. The most significant effectiveness gap concerns cases involving economic operators established outside the

[58] Support for this statement is particularly strong among MSAs (84%, N=140), customs authorities (60%, N=10) and other authorities responsible for product safety and compliance (52%, N=21), By contrast, consumer organisations are much more sceptical, with 83% disagreeing (N=6). Business stakeholders expressed more mixed views. While 56% of national business associations and 48% of individual businesses agreed that measures are effective in bringing non-compliance to an end, EU-level business associations were slightly more negative overall, with 38% agreeing and 42% disagreeing.

[59] Agreement is particularly high among customs authorities (89%) and MSAs (73%), while it was lower among EU-level business associations (33%). Among other private-sector stakeholders, 67% of national business associations and 67% of individual businesses agreed.

[60] For authorities, only 30% of MSAs (N=139), and 20% customs authorities (N=10) considered that measures adopted in one Member State are effectively applied in other Member States. Among business stakeholders, agreement with the statement ranged from 38% among individual businesses (N=41) to 25% among national business associations (N=24) and 21% among EU-level business associations (N=24).

EU, with the majority of survey respondents agreeing that enforcing corrective measures is substantially more difficult in such cases (88%, N=276).[61]

- **Rights and obligations of economic operators**

The MSR has, to some extent, strengthened the regulatory toolbox for MSAs by clarifying roles, responsibilities, and cooperation duties of economic operators along the supply chain. Yet the practical enforcement impact of Article 4 remains limited, particularly for e-commerce and products imported from third countries, because authorised representatives are often inexistent or fictitious and do not bear sufficient product compliance responsibilities. In addition, providers of online marketplaces (OMs) as providers of intermediary services do not fall into the category of economic operators and are only subjected to limited obligations under the MSR.

Overall, the MSR sets clear obligations for economic operators in the Single Market, as confirmed by 64% of respondents of the targeted survey (176 out of 274, both economic operators and MSAs). The rights and obligations of economic operators - namely manufacturers, authorised representatives, importers, distributors, and fulfilment service providers - are set out in a structured manner in the MSR. Pursuant to Articles 4 and 5, a product may only be placed on the market if there is an economic operator established in the Union who is responsible for certain tasks related to product compliance. EU-based manufacturers, importers, authorised representatives (ARs), or fulfilment service providers, where no other economic operator is established in the EU, are responsible economic operators under this provision. In addition, Article 7 imposes cooperation obligations on economic operators and on information society service providers.

Regarding the tasks of responsible economic operators, they are found to be clear, but implementation difficulties arise in practice[62]. First, the evaluation of Article 4 found out that economic operators report that the obligation to verify and retain compliance documentation is not systematically implemented. Second, concerning the provision of information and documentation to MSAs upon reasoned request, both economic operators and MSAs report recurring difficulties. Once requests are made, economic operators often need to retrieve documentation from third parties, adapt it to national language requirements[63], or clarify responsibilities. This results in a significant number of cases, where economic operators either do not reply, reply only after a delay, or indicate that they do not hold the documentation or the mandate required to respond substantively. Third, the obligation to inform MSAs when economic operators have reason to believe that a product present is rarely triggered on the economic operators' own initiative. Finally, some economic operators report practical constraints in fulfilling the obligation to cooperate with MSAs, including following a request to take corrective actions. This is particularly the case for economic operators such as fulfilment service providers.

Yet, as concluded in the evaluation of Article 4, market surveillance authorities encounter difficulties to identify the responsible economic operators and hold them accountable for their product compliance-related responsibilities under Article 4 MSR, particularly for products sold online from third countries. Out the universe of EU-based responsible economic operators, market surveillance authorities have particular problems to identify authorised representatives of

[61] While agreement with the statement exceeded 80% across all stakeholder groups, it was comparatively lower among MSAs (87%) than among individual businesses (91%), national business associations (96%), and consumer organisations and EU-level business associations (100%).

[62] European Commission (2024), Evaluation study on the Implementation of Article 4 of Regulation (EU) 2019/1020 on Market Surveillance and Compliance of products.

[63] There are language requirements for the DoC and the manual to place product on the market.

foreign manufacturers, as Article 4 contains no mechanism to verify their existence. It can be estimated that about 60% of products sold online on the EU market can currently not be traced to a responsible economic operator established in the EU, out of which 85% is attributable to the inability to identify the authorised representative[64]. In addition, a JAHARP report[65] finds that Article 4 alone is insufficient to address the scale and nature of non-compliance in e-commerce, as most problematic products are sold without any EU-based economic operator involved. The report also found that many entities named as authorised representatives in online product listings lack a valid designation or are incorrectly designated by sellers or platforms without manufacturer involvement, making their role legally void. In other cases, fake authorised representatives are mentioned together with difficulties in verifying whether an authorised representative has actually been appointed by the manufacturer[66].

Stakeholders confirm that issues with authorised representatives represent a critical enforcement challenge. In particular, 77% of survey respondents (N = 275, among all stakeholders group) indicated that enforcement is hindered because, in practice, an authorised representative often does not exist or cannot be reached. Interviews with MSAs estimate that in 90% of cases, the authorised representative cannot be found or verified. Finally, the respondents of the public consultation confirm that view, as over half disagrees that the MSR provides adequate mechanisms to enforce authorised representatives' obligations (54%, N=148), including 60% of public authorities and 48% of businesses.

In addition, where authorised representatives are formally indicated and identified, the level of their responsibilities is too low. This is confirmed by the survey, where 67% of respondents (N = 272) report difficulties with responsibilities of authorised representatives.[67]

Moreover, Article 4 applies only to products subject to 20 of the 70 pieces of Union harmonisation legislation covered by the MSR, leaving a significant gap not covered by the MSR nor by its equivalent. In addition, 16 other pieces of Union harmonisation legislation impose Article 4-like requirements. Yet a large majority of respondents to the public consultation (92%, N = 154) agree, of which 123 agree strongly, that an EU-based responsible economic operator should be required for all harmonised products.[68]

Finally, the evaluation on Article 4 also finds that fulfilment service providers (FSPs) represent a recurring enforcement challenge under Article 4, due to the low awareness of their responsibility and limited visibility in supply chains. Fulfilment Service Providers (FSPs) are companies that offer warehousing, packaging, addressing and dispatching.[69] Under Article 4 they can be made responsible for product compliance in case no other EU-based economic operator is available. However, both MSAs and other stakeholders report structural difficulties in translating

[64] Source: MSR IA Study. Data triangulated from Regierungspräsidium Tübingen, enforcement exercise (all named authorised representatives stated they were not authorised for the products in question, indicating failures are overwhelmingly due to fake or non-existent representation). Latvian PTAC, enforcement exercise on a random sample of 500 marketplace listings (94.2% non-contactable rate).
[65] JAHARP2021-10, Report on Joint Action on Harmonised Products 2021 to support the implementation of Article 4 of Regulation (EU) 2019/1020, shared.
[66] European Parliament (2023), Market surveillance for effective consumer protection in the EU. The role of Market Surveillance Authorities and their cross-border cooperation.
[67] Agreement is reported by 68% of MSAs and 74% of other authorities responsible for product safety or compliance. Among private-sector stakeholders, 83% of national business associations, 69% of individual businesses, and 63% of EU-level business associations report issues with AR's limited responsibilities.
[68] Support is consistently high across stakeholder groups, with 96% of business associations, 82% of companies/businesses, and 91% of public authorities expressing agreement.
[69] Some large platforms offer such services e.g. Amazon Fulfilment by Amazon.

this legal role into effective enforcement outcomes, as also evidenced by the JAHARP report.[70] A key issue identified in the study is that many FSPs are not aware of their responsibilities under Article 4 and frequently do not recognise themselves as falling within the scope of Article 4. While bigger platforms and major market players are generally aware of the responsibilities, smaller operators often do not consider themselves subject to Article 4. The Joint action report also identifies difficulties in identifying FSPs and establishing their role in the supply chain. FSPs are rarely visible on online product listings, and information on warehousing, packaging and dispatch is typically not disclosed.

Providers of online marketplaces (OMs), as providers of intermediary services, do not fall into the definition of economic operators under Article 2 of the MSR. As a result, amongst others, MSAs cannot exercise their powers on them. This is confirmed by stakeholders: lack of effective enforcement powers for online trade (e.g. towards marketplaces) is quoted as a second biggest challenge related to market surveillance. In addition, 73% of respondents (113 out of 154) to the public consultation agree that boosting the responsibilities of OMs would have a positive effect on market surveillance and increase product compliance.[71]

Cooperation obligations on information society service providers stemming from Article 7 are necessary but limited. An information society service provider is a company that delivers digital services online. Under this Article, information society service providers are required, upon request and in specific cases, to cooperate with MSAs to facilitate any action taken to eliminate or, if that is not possible, to mitigate the risks presented by a product that is or was offered for sale online through their services. Evidence show that this provision has strengthened cooperation in individual cases has had limited effect in addressing repeated, large-scale or systemic non-compliance in online markets. Across interviews, stakeholders broadly confirm that Article 7 establishes a necessary but limited cooperation framework for information society service providers.

4.1.1.5 To what extent has the MSR improved operational enforcement capacity and resources? (SO2)

While the MSR has led to some improvements in operational enforcement capacity, such as an increased number of investigations and wider uptake of digital tools, enforcement capacity of market surveillance authorities is insufficient and uneven across the Union.

- **Operational enforcement capacity**

Views from stakeholders confirm that insufficient enforcement capacity is one of the major challenges for market surveillance across the EU. Issue of capacity and resources for market surveillance were quoted by the market surveillance authorities in the targeted survey as the most common challenge for market surveillance (205 respondents out of 287, or 71%)[72], in particular when it comes to insufficient human and financial resources and increased workload. Similarly, the public consultation indicates that 54% of respondents (n=148) disagreed or strongly disagreed (30% and 24%, respectively) that the resources allocated to market surveillance activities in their Member

[70] JAHARP2021-10, Report on Joint Action on Harmonised Products 2021 to support the implementation of Article 4 of Regulation (EU) 2019/1020, shared.

[71] Support for enhanced OM responsibilities was particularly high among public authorities (93% N=45) and civil society stakeholders, including consumer organisations (100%, N=6), while business stakeholders showed lower levels of agreement (67% among business associations, N=70 and 41% among companies, N=22).

[72] Of those raising this issue, 61% were market surveillance authorities, followed national and EU business associations with 11% respectively and 8% other authorities responsible for product safety or compliance.

State have been adequate.[73] A 2025 JRC study shows that focus of EU-level inspection volumes is highly uneven: consumer-oriented product groups are often adequately or over-inspected, whereas large industrial categories are significantly under-represented, and only a small number of Member States achieve inspection levels proportionate to their market size.[74]

In addition, enforcement capacity varies across the Member States, fragmenting the Single Market. This can be reflected by a large dispersion in the number of inspections recorded in ICSMS, ranging from 9 to 1284 notifications per million of population across Member States (while taking into account data limitations - see Section 1.1). Stakeholders confirm that resources are not allocated at a comparable level across the EU, with 93 of the 148 respondents of the public consultation (63%).[75]

- **Human and financial resources**

The MSR requires Member States to ensure that their MSAs have the necessary resources - including sufficient budgetary and other resources, such as a sufficient number of competent personnel, expertise, procedures - for the proper performance of their duties. This notwithstanding, overall human and budgetary resource remain inadequate.

Overall, evidence suggests the resources allocated to market surveillance remain broadly insufficient to ensure enforcement across the EU. A 2024 PROSAFE report indicates that the resources available to MSAs for compliance checks generally remain inadequate, prompting authorities to rely heavily on prioritisation practices, such as targeting specific product characteristics or types of economic operators.

Since the entry into application of the MSR, available evidence suggests that budgets of Member States form market surveillance have remained broadly unchanged between 2021 and 2025. The average budget for MSAs (excluding labour costs) decreased from around 5.97 million in 2014-2016 (before the entry into force of the Regulation) to EUR 5.76 million in 2020-2022[76]. While no robust estimates for 2019 exist, the total annual market surveillance budgets across the EU-27 amounted to about EUR 153 million in 2022, excluding staff costs. While it is very challenging to put that number into perspective and make a comparison with the total costs incurred before the MSR due to data availability, available evidence suggest that budgets have remained practically unchanged on average in the period 2021-2025, and in many cases even decreased in nominal terms[77]. The total annual budget (incl. staff costs) could thus be estimated at around EUR 650 million or 0.008% of total EU public spending[78] – in comparison France (as the only Member State with available data) spends 0.1% of public expenditure in 2025 only for customs[79]. Across reporting countries, the nominal budgets grew by 5.6% over the period, with

[73] The support for this view was highest among business associations (67%) and consumer organisations (83%), while companies/businesses showed a more mixed view (36%), with a relatively high share of "don't know" responses (36%). Public authorities were evenly split, with 36% disagreeing and 36% agreeing that resources allocated are adequate, with 18% neutral and 11% not sure.

[74] Arcot Rajashekar, A., Capurso, V. and Robouch, P., Resources allocated for market surveillance activities in the EU27, European Commission, Geel, 2025, JRC142737.

[75] This view was particularly pronounced among business associations (68%, N=70) and consumer organisations (83%, N=6). Companies/businesses were also critical (50%, N=22), while the remaining respondents selected "don't know" (50%). Public authorities (N=45) were more divided, with 56% disagreeing or strongly disagreeing and 44% responding "don't know". Notably, none of the respondents expressed agreement.

[76] Based on information from Arcot et al.2025 for eight countries with relatively comprehensive and stable data series (Bulgaria, Cyprus, France, Croatia, Poland, Romania, Sweden, Slovakia).

[77] Based on information for 20 MSAs in 11 Member States with complete datasets, collected directly from MSAs.

[78] Computed by adding EUR 150 million budget excl. staff costs (Arcot et al., JRC, 2025), and staff cost of 10 000 FTEs in market surveillance (Ecorys, Capgemini, Rel-I, 2026), using the EU average ISCO-2 hourly labour cost of EUR 40.50. Eurostat 2025 data for public spending.

[79] France, PLF 2025, Mission « Gestion des finances publiques », Programme 302 and Eurostat.

growth rates ranging from -4.5% to +15.1%. After adjusting for country-specific inflation (HICP deflators), average real budget growth drops to just 0.7%, ranging from -7.6% to +8.9%, with half of the countries (5 out of 11) experiencing a real decline in their market surveillance budgets over the period. In addition, when accounting for the market size in different Member States for comparison purposes, JRC reports that national market surveillance budgets show a substantial dispersion in funding across Member States (ranging from around EUR 0.2 million to EUR 157 million per EUR 1 million of market value). The public consultation shows that 63% of respondents (n=148) disagree that all EU Member States have allocated a comparable level of resources.

Similarly to the budgetary resources, average MSA staffing remained essentially unchanged in the 2019-2025 period[80]. According to the JRC study[81], the total number of FTEs in market surveillance increased between 2019 and 2022 but it remains low. The study also notes that data on FTEs were considered very imprecise due to different calculation methods, definitions, and scope. While it is not possible to provide a robust comparison due to the lack of complete data, partial data received from MSAs, points to a marginal decline in the total number of staff (in FTEs) available for market surveillance activities by -0.1% for the 2019-2025 period. At the country level, the average growth rate was 1.5%, ranging from -4.8% to +9.8%, with 4 of 11 countries recording a net decline. Overall available data suggests that staffing levels have remained broadly stable or slightly decreasing over the 2019-2025 period. Based on the current estimations, the total staff dedicated to market surveillance is around 10 000 FTEs[82], which is limited compared to 82 700 in customs.[83]

- **Testing capacity**

Overall lack of testing capacity is reflected by the composition of checks, the product sectors they are performed in, and the Member States they are performed by. In 2024, 336 product groups and 9 172 specific models of products underwent testing, out of which more than a half of tested product groups can be attributed to one Member State, and seven Member States account for majority of products models tested.[84] More than half of all tested product models were concentrated in six sectors (i.e., Ecodesign, Chemicals, Toys, Hazardous Substances, Waste Electrical and Electronic Equipment, Low Voltage Directive and Cosmetics) confirming that laboratory capacity is primarily directed towards core regulatory areas. Looking at the composition of checks in 2024 and 2025, the data show that, at an aggregate level, across the two years, documentary checks accounted for 47% of checks, 33% were physical checks, and 20% were laboratory checks. This is also confirmed by a recent EP study finding that access to sufficient testing capacity remains uneven and insufficient.[85]

Stakeholders recognise the value of Union testing facilities (EUTFs), but the current capacity is insufficient to ease pressure on national resources. Evidence from the public consultation indicates persistent resource constraints, with 40% of respondents disagreeing that existing EUTFs have alleviated national capacity constraints linked to product checks. While MSAs were generally in agreement that EUTFs constitute a useful tool, a notable share expressed the view that existing

[80] Based on information for 27 MSAs/SLOs with complete 2019-2025 staffing data across 10 countries, collected from MSAs.
[81] Arcot Rajashekar, A., Capurso, V. and Robouch, P., Resources allocated for market surveillance activities in the EU27, European Commission, Geel, 2025, JRC142737.
[82] Evaluation study, based on JRC (Arcot et. Al, 2025) and data provided by MSAs.
[83] EC (2023), *Impact Assessment Report accompanying the proposal for a reform of the Union Customs Code*, SWD(2023) 140 final, p. 51. See here.
[84] Arcipowska, A., Arcot Rajashekar, A., Capurso, V. and Robouch, P., The EU market surveillance indicators: MSA activities, collaboration and results, European Commission, Geel, 2025, JRC144277.
[85] European Parliament. (2023). Market surveillance for effective consumer protection in the EU: The role of Market Surveillance Authorities and their cross-border cooperation (Study PE 754.190). Directorate-General for Internal Policies of the Union.

facilities is not sufficient. Despite high levels of uncertainty, 33% agreed that testing facilities allow them to obtain reliable results for complex cases; while 43% agree that access to the facilities allows them to avoid potential conflict of interest. On the other hand, 30% disagree that their authority has sufficient access to EUTFs, when necessary, with only 18% agreeing that access is sufficient for their needs. Furthermore 50% disagree that the number of EUTFs is adequate to support market surveillance activities with only 5% indicating this number is sufficient.

While the number of EUTFs available has increased, challenges remain with regarding sufficient testing capacity across Member States. Article 21 of the MSR allows the Commission to designate EUTFs to increase product testing capacity. The Commission designated the Communications Regulatory Authority of the Republic of Lithuania as the EUTF for radio equipment[86] and electromagnetic compatibility (EMC)[87]; France's Service Commun des Laboratoires as the EUTF for toys[88]; Austria's HBLFA as EUTF for Ecodesign and Energy Labelling[89]. However, 69% of MSAs who expressed their view in the targeted survey (79 out of 114), the number of laboratories is not adequate to support market surveillance activities. In fact, as noted by Commission's experts working on the EUTFs, the designation of new laboratories is challenging due to a tedious and time-consuming two-step designation and financing process, creating unnecessary overhead that discourage candidate laboratories. Also, conditions for EUTFs are very stringent - currently EUTFs must be public entities and can only serve public entities (excluding private sector clients) - which limits the financial attractiveness of the status. In addition, MSAs utilise 25% of the total testing capacity of the EUTFs, as the access to EUTFs testing is subject to the EU and national public procurement procedures.

- **IT tools and digitalisation**

Digital tools such as ICSMS and Safety Gate support operational capacity by facilitating systematic information sharing, case documentation and coordination across Member States. ICSMS is the EU's internal platform used by market surveillance authorities to share information on inspections and non-compliant products, while Safety Gate is the EU rapid alert system that enables authorities to report and coordinate responses to dangerous non-food products across Member States. The two IT tools are the main reporting systems for MSAs on products found non-compliant and unsafe. While both tools predate the MSR, the Regulation strengthened their role within the enforcement framework (including by making ICSMS mandatory for in-depth checks of compliance in 2021), although their effectiveness in practice remains limited by uneven uptake and interoperability challenges.

While accounting for data limitations (see Section 1.1), trends in both inspections launched in ICSMS and alerts recorded in Safety Gate indicate an increasing use of the systems over time, but the overall coverage remains limited. Total Safety Gate alerts nearly doubled from 2 150 in 2019 to 4 645 in 2025 (approx. 116% increase), suggesting a marked intensification of activity over time. ICSMS data show a similar trajectory: the number of individual MSAs that have created at least one record in ICSMS increased, from about 230-250 in the years 2019 to 2021 to 408 by 2025

[86] EC. (2023). Commission Implementing Decision (EU) 2023/733 of 3 April 2023 designating Union testing facilities for radio equipment and toys in accordance with Regulation (EU) 2019/1020 of the European Parliament and of the Council. Official Journal of the EU, L 95, 42–43. https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32023D07

[87] EC. (2025). Commission Implementing Decision (EU) 2025/526 of 21 March 2025 designating a Union testing facility for EMC

[88] EC. (2023). Commission Implementing Decision (EU) 2023/733 of 3 April 2023 designating Union testing facilities for radio equipment and toys in accordance with Regulation (EU) 2019/1020 of the European Parliament and of the Council. Official Journal of the EU, L 95, 42–43. https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32023D07

[89] EC. (2024). Commission Implementing Decision (EU) 2024/1456 of 27 May 2024 designating a Union testing facility for eco-design and energy labelling. Official Journal of the EU. https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202401456

(see Annex VI). The overall number of investigations also rose, indicating substantial growth in the system's use for documenting enforcement activity. However, ICSMS does not provide a fully comprehensive picture of EU market surveillance activity: as estimated by the JRC, only 10% of all investigations are recorded in ICSMS[90]. In addition, data quality of investigations reported in ICSMS is inconsistent, with entries being recorded in different languages, with different level of details, and with important information missing. The targeted survey of MSAs confirms these findings: a large majority of respondents finds that the use of ICSMS varies across Member States (133 out of 170 MSAs, or 78%), and that completeness and quality of data vary across Member States (137 out of 170 MSAs, or 81%). Consequently, exchange of information across Member States and reliance on findings in other MSAs is poor, which is confirmed by 113 out of 170 MSAs (66%). This in turn impacts resources as the same product is often assessed multiple times in different Member States, generating unnecessary costs.

Regarding the effectiveness of these tools in supporting capacity, stakeholders' views are mixed. When MSAs responding to the public consultation were asked to what extent they believe ICSMS has fulfilled its mandate of improving the sharing, processing, and storage of information related to the enforcement of EU product rules (N=45), a majority expressed a positive view, with 60% agreeing or strongly agreeing that ICSMS has fulfilled this mandate, 24% disagreed, while 13% were neutral on the issue.

As highlighted in a 2023 EP study, the effectiveness of the tools remains constrained by several factors. These include ongoing interoperability issues with national databases and other EU systems, significant disparities in usage across Member States, and insufficient harmonisation of implementation and operational practices, all of which can undermine their contribution to coherent and effective market surveillance at Union level.[91]

In fact, many Member States rely on one or multiple national IT tools, on top of ICSMS, which increases administrative burden for reporting and bears important costs. At present, many authorities continue to rely on domestic case-management tools. According to a survey among the MSAs, 60% of MSAs (100 out of 166) report the need to use other systems than ICSMS, with the reported number of distinct IT tools exceeding 194 (partial data for 24 Member States, total number is likely to be much higher). Among those national systems, 84% are not connected to ICSMS[92]. As the MSR includes a requirement to record in ICSMS all in-depth checks, this multitude of IT tools poses an administrative burden on authorities. It is estimated that unnecessary administrative burden from duplications in recording reaches EUR 5 billion[93]. A large majority of respondents of the targeted survey finds that reliance on parallel national tools creates duplication and administrative burden (105 out of 170 MSAs, or 62%).

Limited linkages of ICSMS with other EU IT tools, including tools used in customs, creates an additional layer of administrative burden for authorities. Currently, ICSMS is not linked to several sectoral databases (e.g. EUDAMED covering medical devices, and CPNP on cosmetic

[90] Arcot Rajashekar, A., Capurso, V. and Robouch, P., Resources allocated for market surveillance activities in the EU27, European Commission, Geel, 2025, JRC142737.
[91] Geraci, M., Carletti, G., Gasperini, M., Truc, M., Cantarelli, A., Hassan, E. (2023). Market surveillance for effective consumer protection in the EU: The role of Market Surveillance Authorities and their cross-border cooperation. European Parliament.
[92] 40 national IT tools connected to ICSMS include those in Germany, Denmark, Slovakia, the Czech Republic, France and Ireland.
[93] Based on average time reported by MSAs spent on encoding investigations in ICSMS and national tools, the total number of investigations from ICSMS and the EU average labour cost. See details in Annex IV of the Commission impact assessment report on the revision of the MSR.

products), while the link to Safety Gate (used for dangerous products) only allows for the flow of information from ICSMS to Safety Gate, and not the other way around. This means that reporting obligations are duplicated at EU level, creating additional administrative burden. A large majority of MSAs replying to the public consultation (39 out of 45 MSAs, 87%) agreed that a greater synergy between digital databases and tools across relevant EU acts would boost market surveillance. Similarly, the majority of MSAs (67%, N=169) who replied to the targeted survey disagreed that the digital tools supporting the EU market surveillance system are sufficiently interconnected with other relevant IT systems (customs systems, nationals). In particular, web crawlers, used by national authorities in the detection of online offers of dangerous products, were most frequently perceived as insufficiently interconnected with ICSMS.

4.1.1.6 To what extent has the MSR achieved reinforced cooperation procedures? (SO3)

Cooperation within Member States has improved since the entry into force of the MSR, yet some national systems face substantial challenges stemming from institutional and procedural setups. In addition, while cross-border cooperation between MSAs improved since MSR, it remains insufficient and uneven.

- **Cooperation between competent authorities within Member States**

Following the MSR's introduction, national market surveillance systems have evolved toward more coordinated and structured governance arrangements, which strengthened the coordination of relevant authorities within Member States. However, different governance systems exist in Member States, which has an impact on cooperation. In sum, the majority of respondents of the targeted survey (52%, 122 out of 233) consider that the Regulation has enhanced cooperation between competent authorities within Member States.[94]

Since the application of the MSR, **Member States have broadly adapted their systems in ways that have strengthened coordination, including through the appointment of SLOs.** Under the MSR, Single Liaison Offices (SLOs) coordinate market surveillance activities at national level and facilitate cooperation and information exchange between Member States and the European Commission**.** According to an EP study on compliance, surveyed MSAs pointed to the benefits of more centralised national governance through the appointment of SLOs.[95] According to surveyed stakeholders 73% (n=45), SLOs have appropriately represented the coordinated position of the MSAs in their Member State. Evidence from open survey responses and interviews indicates that SLOs have strengthened coordination within Member States.

While patterns differ across Member States, cooperation between MSAs and customs authorities within Member States remains in some cases constrained by procedural complexity, capacity limitations and limited IT integration. Since the MSR's adoption, progress regarding cooperation between MSAs and customs authorities has been uneven and differs in nature, as some Member States report streamlined procedures, while others note only marginal improvements and ongoing challenges.[96] In practice, as set up by MSR the customs authorities make a first check of a product and, even in cases where the non-compliance is obvious, they must refer their finding to an MSAs. MSAs in turn must revert to customs within four days whether to

[94] Views are positive across authorities, namely customs authorities (88% agreement, N=8), MSAs (68% agreement, N=141) and, to a lesser extent, other authorities responsible for product safety or compliance (43%, N=21).
[95] European Parliament, Policy Department for Economic, Scientific and Quality of Life Policies, Market surveillance for effective consumer protection in the EU (2023), PE 754.190.
[96] Geraci, M., Carletti, G., Gasperini, M., Truc, M., Cantarelli, A., Hassan, E. (2023). Market surveillance for effective consumer protection in the EU: The role of Market Surveillance Authorities and their cross-border cooperation. European Parliament.

continue the suspension or not, and as a next step issue a decision on the refusal or release of the product. In practice, this system creates administrative burden (linked to communication, shipping samples to MSAs) and duplication of work in cases where there is no need for a specialised expertise to declare that a product is non-compliant. In practice, overloaded MSAs do not reply to customs within four days and customs are obliged to release the products, even in cases where they are obviously non-compliant. While exact numbers of these instances do not exist, Commission data reports that in 2025 only 26% of goods suspended by customs were refused, following the decision of MSAs.[97] In comparison, during the Priority Control Area actions in 2025 with enhanced mobilisation of both customs and market surveillance authorities, this ratio was found to be 83%. This illustrates that market surveillance authorities do not cope with the workload at the border in the current system. However, it is also important to note that in some Member States, such as France and Finland, customs authorities also serve as MSAs. In these cases, no formal notification from customs to MSAs of any suspension for the release of a product for free circulation is required, as customs authorities can independently assess whether a product is compliant or poses a serious risk and act accordingly.

In terms of barriers to effective cooperation between MSAs and customs within Member States, persistent issues include limitation to digital tools, as well as differences in working methods and lack of clearly attributed counterparts[98]. According to the MSAs and customs authorities consulted in the Article 4 evaluation, operational IT integration between MSA and customs systems is still not in place. Customs authorities reported that they continue to communicate with MSAs primarily by e-mail and rely on the Customs Risk Management System for sharing risk information. The interconnection between the EU Customs Single Window Certificate Exchange System (EU CSW-CERTEX) and ICSMS was established at EU level in accordance with the legal deadline in December 2025. It is since then available for Member States customs administrations to interconnect, on a voluntary basis, their national customs systems to EU CSW-CERTEX. While several MS have announced their intention to interconnect, as of the time of writing, no MS has completed the interconnection. In addition, the cooperation between customs and MSAs is hindered by a mismatch in working methods and lack of clearly attributed counterparts.

- **Cooperation between competent authorities of different Member States**

Cross-border cooperation takes place in the EU at an insufficient level. Based on the targeted survey of MSAs, the share of investigations conducted jointly between MSAs in different EU Member States is estimated, on average, at only 13% of all national investigations. In addition, based on the targeted survey, each MSA participates only in approximately 4.3 collaborative actions per year. Finally, in 2025, MSAs reported an average of only 8 cases of mutual assistance cooperation (either through requests for information or enforcement requests), with only 47 enforcement requests sent in total across all 14 responding countries. This low volume reflects that only approximately 1.7% of investigation cases recorded in ICSMS during 2024 involved cross-border handling (taking into account data limitations – see Section 1.1).[99] According to the 2023 EP report[100], cross-border cooperation is hindered by a lack of clearly attributed counterparts in

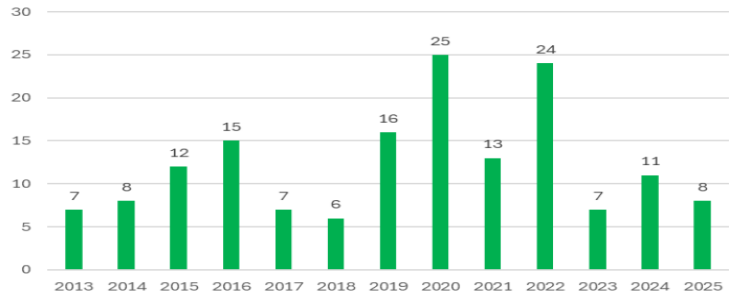
[97] EC, Directorate General for Taxation and Customs Union. (2025). Report on controls on products entering the EU market with regard to product compliance in 2024. Publications Office of the EU.
[98] European Parliament (2023), Market surveillance for effective consumer protection in the EU. The role of Market Surveillance Authorities and their cross-border cooperation.
[99] Arcipowska A., Capurso, V., & Robouch, P. (2025). Market intelligence for surveillance: surveillance from the toys and ecodesign & energy labelling sectors. Luxembourg : Publications Office of the EU. Joint Research Centre.
[100] Ibid. 48.

different Member States, different national strategic priorities (also stemming from geographical position and market characteristics), differences in working methods, as well as limited functionalities of ICSMS in terms of translations impeding exchange of information.

The insufficient and uneven picture is supported by stakeholders. Less than half of respondents of the targeted questionnaire consider that the MSR has enhanced cooperation between competent authorities across Member States (48%, N=230).[101] In addition, 73% of respondents to the targeted survey agree that there are differences in the level of practical cross-border cooperation between Member States.[102]

However, joint actions remain a popular mechanism for coordination, though evidence does not indicate a significant increase in their use over time. According to the targeted survey, over half of MSAs or other authorities (N=167) have participated in joint actions or activities (54%). However, looking at trends from 2013 to the present, there is no evidence of a sustained increase in joint action reports following the MSR's adoption in 2021.

Figure 7 – Joint action reports (2013- 2024)



Source: Own elaboration based on JRC. Note: Data reflects completed and ongoing joint actions.

Despite their perceived value, some stakeholders highlight that joint actions remain burdensome and could be further improved. Overall, 56% of authorities of the public consultation (N=45) agree that joint activities have contributed meaningfully to EU market surveillance. Interviewed SLOs highlighted both the benefits and limitations of joint actions. While stakeholders generally agreed that any form of cooperation is valuable, several noted that joint actions are often limited in scope relative to the size of national markets. Some SLOs cautioned that joint actions can be resource-intensive, with benefits not always clearly proportional to the effort required, while others stressed their particular value for smaller Member States, for whom joint actions can make market surveillance activities feasible at all.

Mutual assistance mechanisms (MSMs) are contributing to enhanced cooperation between authorities, but their use remains concentrated among a few Member States and overall growth is limited, with current available evidence showing only isolated examples of effective collaboration. MSMs envisaged under Article 22 and Article 23 are designed to facilitate cooperation. MSMs include requests for information (which enable authorities to request necessary

[101] Agreement with the statement is highest among market surveillance authorities (62%, N=138), while other authorities responsible for product safety or compliance (48%, N=21) and customs authorities (38%, N=8) were less positive. Also, a majority of national business associations (51%) agreed with the statement, while EU-level business associations (13%) and consumer organisations (17%) were considerably less positive.

[102] Such differences are particularly noted by national business associations (84%, N=25), consumer organisations (83%, N=6), EU-level business associations (82%, N=22), and individual businesses (74%, N=42). Among authorities, 80% of other authorities responsible for product safety or compliance (N=20), 68% of market surveillance authorities (N=142), and 64% of customs authorities also agreed with the statement.

info across borders) or requests for enforcement actions (which enable them to request authorities in other Member States to implement enforcement measures). JRC report[103] for 2023[121] indicates an increasing use of these cooperation mechanisms, but largely concentrated among a small group of Member States. Overall, according to the predominant view of MSAs in the public consultation (44% vs 36% respectively), cross-border mutual assistance has only contributed marginally to EU market surveillance, suggesting that its effectiveness in practice remains uneven across Member States.

EU-level coordination structures such as SLOs, the EUPCN, expert groups and AdCos play a central role in strengthening cooperation and knowledge-sharing between authorities, and evidence suggests they have become increasingly important under the MSR. EU working bodies foster cooperation and information exchange between MS. As highlighted in an EP study, MSAs pointed to the benefits of more centralised national governance through the appointment of SLOs, as outlined in Article 10 of the MSR, and praised the role of EU-level working bodies for facilitating cooperation and knowledge sharing[104]. Additionally, expert working groups and joint actions were recognised as effective tools for tackling specific challenges and clarifying ambiguities in the harmonisation of legislation. According to surveyed MSAs (N=167), 63% indicate that there has been an improvement in pooling of expertise due to enhanced cooperation of MSAs at EU level (e.g. AdCos, EUPCN). 82% of MSAs who responded to the public consultation deem the EUPCN successful in boosting cooperation between MSAs across Member States. Views are more divided (40% agree compared to 16% who disagree, N=45) on whether it has sufficiently streamlined market surveillance practices. SLOs are also viewed positively in terms of their contribution towards ensuring cooperation between MSAs (56%, N=45).

4.1.1.7 What external factors and unintended effects (if any) have affected progress towards the objectives and how are they linked to the MSR?

Legal developments after the entry into application have positive effect on the compliance and safety of products. factors are identified as having an impact on effectiveness of the MSR. In particular, the General Product Safety Regulation (GPSR) entered into force in 2023 and strengthened product safety rules for the EU Single Market, particularly for online sales. Chapter IV introduced additional obligations for providers of online marketplaces and enabled coordinated EU enforcement actions, improving online product compliance. In addition, the Digital Services Act (DSA) became fully applicable in 2024 and introduced systemic enforcement obligations for online platforms, including OMs. The DSA strengthened oversight of very large online platforms through Commission-led investigations and platform-wide compliance measures.

However, other factors contribute negatively to the effectiveness of the MSR.

First, limited consumer awareness contributes to the persistence of non-compliance, as consumers are generally unable to assess whether products meet EU requirements, particularly in online environments. Evidence shows that consumers tend to assume products offered online are safe and compliant, while in reality many products sold via online marketplaces do not meet EU safety rules and are directly imported from outside the EU, exposing consumers to risks they are not able to identify at the point of purchase[105].

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[103] Arcipowska, A., Arcot Rajashekar, A., Capurso, V. and Robouch, P., The EU market surveillance indicators: MSA activities, collaboration and results, European Commission, Geel, 2025, JRC144277.
[104] European Parliament (2023), Market surveillance for effective consumer protection in the EU. The role of Market Surveillance Authorities and their cross-border cooperation.
[105] SWD(2021) 168 final. See here

Second, evolving trade patterns, combined with the structural shift towards e-commerce via new business models, have increased the volume of products entering the Union market while reducing the effectiveness of traditional controls (see Section 4.1.1.1).

Third, the fast-evolving nature of EU product legislation increases the complexity of compliance. Continuously updated regulatory requirements, also due to emergence of new technologies and safety risks, create challenges for economic operators to comply and authorities to develop necessary expertise[106].

4.1.2 Efficiency

4.1.2.1 What were the costs of the intervention?

The implementation of MSR lead to costs for both MSAs, EU and economic operators.

a) Costs for MSAs

The MSR, Art.10(5), posits that in order to carry out market surveillance of products made available online and offline with the same effectiveness for all distribution channels, Member States shall ensure necessary resources. However, it is important to note that not all costs incurred by the MSAs can be attributed in their entirety to the MSR, because these costs include activities required by both national and sectoral legislation.

Since the entry into application of the MSR, budgets of Member States for market surveillance have stagnated between 2021 and 2025, while the average MSA staffing remained essentially unchanged in the 2019-2025 period[107]. While no robust estimates for 2019 exists, the total annual market surveillance budgets across the EU-27 amounted to about EUR 153 million in 2022, excluding staff costs.[108] Despite methodological difficulties, available data suggest that the average real MSR budget growth across EU countries amounts to just 0.7% (see Section 4.1.1.5 for more information).[109] Recent data on staffing received from MSAs points to a marginal decline in the total number of staff (in FTEs) available for market surveillance activities by -0.1% for the 2019-2025 period.[110] Based on the current estimations, the total staff dedicated to market surveillance is around 10 000 FTEs (see Section 4.1.1.5).[111]

As evidenced by the Article 4 evaluation, the MSR entry into force does not seem to have increased substantially the costs related to checks performed by MSAs. Recent information from MSAs points to the average duration of about 3 hours for simple checks (or EUR 120) and 8.44 hours for an in-depth compliance check (or EUR 340).[112] Compared to estimates pre-dating MSR, this duration is stable for simple checks while some increase in efficiency for in-depth compliance checks can be observed, although the data is partial.[113] Case-specific factors may affect the time, such as cooperation with economic operators in third countries and identification of responsible EU-based economic operators. Overall, the Art.4 implementation report[114] finds that most MSAs (70 out of 108) did not, according to the performed survey, experience any changes in

[106] SWD(2021) 168 final. See here
[107] Based on information for 27 MSAs/SLOs with complete 2019-2025 staffing data across 10 countries, collected from MSAs.
[108] Arcipowska, A., Arcot Rajashekar, A., Capurso, V. and Robouch, P., The EU market surveillance indicators: MSA activities, collaboration and results, EC, Geel, 2025, JRC144277.
[109] Based on information for 20 MSAs in 11 Member States with complete datasets, collected directly from MSAs.
[110] Based on information for 27 MSAs/SLOs with complete 2019-2025 staffing data across 10 countries, collected from MSAs.
[111] Evaluation study, based on JRC (Arcot et. Al, 2025) and data provided by MSAs.
[112] Administrative data collected from MSAs through a dedicated data request.
[113] In 2019, i.e. before Article 4 became applicable, the average time needed to perform a general check on harmonised products currently covered by Article 4 was 2.7 hours for simple checks (i.e. not exceeding 5 hours) and 12.5 hours for in-depth compliance checks.
[114] COM(2025) 63 final, Brussels, 3.3.2025

the cost of market surveillance since Article 4 became applicable. These observations are also confirmed by the data received from the MSAs, where the costs in real terms for documentary checks, physical checks, and laboratory tests remain are stable over 2019-2025.

Many Member States rely on one or multiple national IT tools, on top of ICSMS, which decreases efficiencies through unnecessary administrative burden for reporting and bears important cost. At present, many authorities continue to rely on domestic case-management tools, customs interfaces, laboratory databases, and sector-specific registries that do not always communicate seamlessly with EU-level platforms. According to an ICSMS-specific survey of MSAs, 60% of MSAs (100 out of 166) report the need to use other systems than ICSMS. 191 distinct IT tools were reported (partial data for 24 Member States, the total number is likely to be much higher) out of which 84% are not connected to ICSMS. In fact, MSA experts note that about 30 minutes are needed to record a case in ICSMS, in contrast to 20 minutes in a national system. This multitude of IT tools poses an administrative burden on authorities estimated at around EUR 5 million of recurring administrative costs due to duplications in reporting.[115] In turn, a large majority of respondents finds that reliance on parallel national tools creates administrative burden (105 out of 170 MSAs, or 62%). At EU level, the costs of encoding cases in ICSMS for 2025 are estimated at EUR 867 thousand[116]. Finally, limited interoperability of ICSMS with other EU IT tools, including tools used in customs, creates an additional layer of administrative burden for authorities. This means that reporting obligations are duplicated at EU level, creating additional administrative burden estimated at EUR 8 million recurrent annual costs.[117]

Overall, the total costs for MSAs stemming from MSR remain stable since the entry into application of the MSR.

- **Costs for economic operators**

The overall compliance costs stemming from MSR for businesses are limited and in line with expectations. Annual MSR compliance costs for businesses (incl. manufacturers, importers, authorised representatives) are estimated at 0 to 0.03% of turnover, close to the 0.05% anticipated in the original IA.[118] The MSR did not substantially increase costs for economic operators. However, business associations noted in the interviews that it is very challenging to disaggregate MSR compliance costs from the costs of product-specific legislation. While compliance costs typically account for a larger share of turnover for smaller firms, the MSR-related compliance costs did not heavily weigh on any type of companies, including SMEs, given their limited amounts.

These costs include administrative costs to draw up, keep records of and show to MSAs the EU declaration of conformity or the technical documentation for their products (Art.4). Most respondents in the Art.4 evaluation did not observe changes since the entry into application of the MSR in the duration of MSA compliance checks. Targeted survey suggests a median of around 2.8 hours per investigation to verify that the EU declaration of conformity, as well as the technical documentation, have been drawn up (N=24). Several respondents also stressed that the process

[115] Estimations of the current time spent on recording were based on the following assumptions : i) average time to record an investigation in ICSMS (based on the expert information) and national systems (based on the findings on the MSR Evaluation study), ii) percentage of MSAs using another IT tool than ICSMS (MSA survey), iii) total number of inspections conducted annually estimated by JRC (Rajashekar et al., 2025). These were compared with the estimated time needed to record the same number of inspections only once in ICSMS.

[116] Computed as time spent on recording multiplied by 42,794 investigations reported in ICSMS, multiplied by the EU average ISCO-2 hourly labour cost of EUR 40.50

[117] Based on targeted survey, an average reduction in time spent on a case was computed and multiplied by the total number of cases (427 thousand based on ICSMS and JRC estimations).

[118] The estimate is based on information from the targeted survey (N=53 businesses and business associations) and publicly available data on company turnover (for 16 businesses).

could take much longer when information must be collected from third-country suppliers, as well as for more complex products.

The cost for economic operators also includes costs to cooperate with EU MSAs. Art. 4 evaluation did not observe changes in the duration of MSA compliance checks. Partial data from businesses (N=13) indicates a range from 2 to 48 hours per check, with a median of around 8 hours. At the same time, several respondents stressed that the duration depends heavily on the type and intensity of the control. In particular, documentary checks may take only a few hours (1-4 hours) as indicated by MSAs in the targeted survey (N=16). More in-depth or physical checks may take days or, most likely, weeks (including waiting times) (N=21). Based on partial data, the cost of a check ranges from EUR 500 to 5,000 (N=5).

As regards to costs stemming from Article 4 for non-EU manufacturers, these remain low but hard to quantify precisely. This is also confirmed by the conclusion of the Article 4 Evaluation study.[119] Authorised representative fees, typically passed onto non-EU manufacturers, range from roughly EUR 200–500 (basic offer) to EUR 3,000–19,000 (large portfolios or high-risk sectors) annually. As noted by business stakeholders during interviews, fees are typically in the range of EUR 1000-8,000. Taking into account the volatility of estimates, costs are broadly in line with the expectations in the IA, where annual fees were expected to range "between about EUR 360 and EUR 1500 per year per business depending on the complexity of products". Fees also skew higher in highly regulated sectors such as medical devices, where more intensive market surveillance and regulatory oversight are required. Furthermore, it should be highlighted that the service quality varies in terms of infrastructure provided, actual verification of compliance documents, insurance, and responsibility levels. Finally, there are no EU-wide statistics that quantify how many manufacturers use authorised representatives.

Finally, regarding fulfilment service providers, the Article 4 evaluation concluded that compliance costs for this group of operators are marginal. Input gathered from stakeholders suggests that FSPs explicitly exclude their product compliance responsibility under their contracts with third-country companies and require that an authorised representative be established. Thus, their costs are likely very limited.

Finally, several businesses and business organisations also note additional costs stemming from legal uncertainty or inconsistent implementation (e.g., differing interpretations between Member States, overlapping horizontal rules), which forces repeated "case-by-case" assessments, re-labelling/re-documentation.

Overall, the total cost stemming from MSR for businesses is not significant and in line with expectations.

[119] European Commission (2024). Evaluation study on the Implementation of Article 4 of Regulation (EU) 2019/1020 on Market surveillance and Compliance of products. October 2024.

- **Costs for the Union budget**

The Union budget costs for market surveillance relate to EU-level support measures aimed at strengthening the enforcement of product safety and compliance rules across the Single Market. These costs include EUTFs, the establishment and operation of the Union Product Compliance Network, support for joint enforcement activities, peer reviews, and the development and maintenance of the Information and Communication System for Market Surveillance (ICSMS), including electronic interfaces with national market surveillance systems and customs authorities.

In 2026, the maximum Union contribution for Market Surveillance actions, amounts to around EUR 17.3 million. As shown in Table 4, the budget has increased between 2021 and 2026 by about EUR 6.5 million in nominal terms. In the 2021-2026 period, the average of the Union budget costs was EUR 14.5 million. The procurement costs in the 2021-2026 period amounted to about EUR 58.5 million, or EUR 9.8 million on average per year. These cover IT developments, joint actions, Administrative and technical secretariats for AdCos, and Union market surveillance campaigns and associated activities, including IT tools and training. The grant costs cover the EUTF costs, i.e. EUR 8 million. The costs for administrative arrangements and other expenditure in the period 2021-2026 are close to EUR 13.9 million, and EUR 3 million on average per year. These cover JRC Technical support and Customs Single Window.

Table 2 – Union budget for Market Surveillance actions (in million EUR)

Year	Grants	Procurements	Other/Admin	Total contribution
2021	6.3	3,6	0.9	**10.8**
2022	2[157]	11.4	1.2	**14.6**
2023	0*	9.3	2.6	**11.9**
2024	1	10.7	3.6	**15.3**
2025	4	11.8	1.2	**17**
2026	1	12	4.3	**17.3**
Total max for six years	**14.3**	**58.8**	**13.8**	**86.9**

**Note: An amending decision in 2024 deleted the specific grant section for 2023, but the finalised contribution for that year was adjusted to approximately EUR 11.9 million.*

The AdCo costs were expected to reach approximately EUR 1.5 million per year (50 meetings, 20-25 AdCos) and are aligned with realised EUR 1 million in 2022 and EUR 929 000 in 2023. The Single Market Programme IA[120] estimated the necessary funding for the EU Product Compliance Network, including AdCo groups and ICSMS, to be EUR 21 million for the set-up phase of 2020-2022 and an operational budget of EUR 10 million annually from 2023 onwards. While the overall procurement costs are slightly higher, they in the same order of magnitude.

Overall, the costs of the MSR were limited for all stakeholders. On the Member States level this translates however into low funding and staffing of market surveillance activities. On the EU and business side, the costs were in line with expectations.

[120] SWD(2018) 320, final PART 1/2, p.245

4.1.2.2 What were the benefits of the intervention?

The implementation of MSR leads to benefits for both consumers and economic operators and MSAs.

- **General benefits for consumers and businesses**

The MSR has contributed positively, although to a limited extent, to improving compliance and safety of products reaching consumers and businesses. As demonstrated by the results of the targeted survey (across all stakeholders' groups) and the public consultation, stakeholders predominantly acknowledge the MSR's positive contribution to improved product compliance and safety: 44% (N=275)[121] and 37% (N=154)[122], respectively. In fact, improved market surveillance reduces the presence of unsafe products on the market, leading to safer consumer products, improving health and safety outcomes, lowering healthcare and premature death costs, reducing financial detriment to consumers, and increasing consumer trust in the market. At the same time, as noted in Section 4.1.1.1, while the MSR has been effective in strengthening market surveillance activity and reporting, the share of non-compliance in completed investigations remains above 50%.

In view of the high non-compliance rates, the MSR has marginally contributed to a level playing field in the Single Market. In fact, all stakeholder groups shared the predominant view that the MSR has marginally contributed to a level playing field, with 42% of respondents in the targeted survey (N=274)[123] and 30% of respondents in the public consultation (N=154). While the MSR has made progress in enhancing regulatory consistency, its effectiveness is limited (see Section 4.1.1.4).

The benefits stemming from a lower number of non-compliant and unsafe products circulating on the Single Market are affected by evolving trade patterns and complex supply chains, combined with the structural shift towards e-commerce via new business models. This exponential growth in e-commerce undermines the effectiveness of market surveillance under the current legal framework.

- **Benefits for the MSAs**

The MSR brought some efficiency gains to MSAs thanks to their increased powers. 59% of respondents of the targeted consultation of MSAs (N=168) consider that the MSR allowed them to generate efficiency gains.

In particular, although cross border cooperation remains limited, the MSR has still improved pooling of expertise across the EU. 63% of MSAs and customs authorities consider that the MSR has resulted in better pooling of expertise due to enhanced cooperation of market surveillance authorities at EU level through coordination mechanisms such as AdCos and the EUPCN (N=167) (see Section 4.1.1.6).

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[121] Agreement is relatively high among customs authorities (70%, N=10), market surveillance authorities (54%, N=141), and 46% of other authorities responsible for product safety or compliance (N=21). It is lower among private-sector stakeholders, with 36% of national business associations (N=46), 34% of individual businesses (N=42), and 22% of EU-level business associations (N=23) having positive views on the MSR's contribution to improved product compliance. In addition, consumer organisations are also sceptical, with 50% disagreeing and 33% expressing a neutral view (N=6).

[122] Support is relatively strong among companies/businesses (59%, N=22) and public authorities (49%, N=45), and less so among business associations (26%, N=70). Consumer organisations are more sceptical, with 67% remaining neutral and 33% disagreeing, (N=6).

[123] The MSR's contribution to creating a level playing field is viewed more negatively by consumer organisations (83% disagreement), EU-level business associations (48%) and individual businesses (40%). In turn, 45% of market surveillance authorities, 43% of other authorities responsible for product safety or compliance, and 10% of customs authorities agree that it has contributed to a level playing field.

While their use is still insufficient and uneven, common EU level IT tools also improved access to relevant data for MSAs. According to 57% of the MSAs in the targeted survey (N=168) considered that ICSMS improved data sharing. The estimated savings from reusing information from the ICSMS are estimated at between EUR 150,000 and EUR 1 million per year[124], and are largely aligned with the estimates provided in the initial IA.

The MSR has also likely increased the use of the mechanism for cost recovery for market surveillance activities by almost 8 percentage points as compared to a pre-MSR situation.[125] This refers to the possibility for MSA to reclaim from EOs the costs incurred in enforcement activities. According to estimates based on MSA information, the rate of recovery has quadrupled, from 2.4% in 2019 to 10% in 2021.

Although cooperation remains a challenge for MSAs, the MSR contributed to the enhancement of the cooperation of MSAs within Member States and created necessary structures at EU level. In sum, majority of respondents of the targeted survey of MSAs (122 out of 233) consider that the Regulation has enhanced cooperation between competent authorities within Member States (incl. customs). While cooperation between Member States remains challenging (see Section 4.1.1.6), the EUPCN network boosted coordination between Member States according to 82% of MSAs responding to the public consultation (N= 45).

Finally, despite underfunding of market surveillance the MSR, EUTFs brought limited although welcomed improvements in testing capacity. According to most MSAs responding to the targeted survey, the EUTFs provided the benefits of reliable results for complex cases that could not be handled through national resources alone (43%, N=158) and independent testing that helps avoid potential conflict of interest (33%, N=158).

Overall, the benefits of MSR for consumers and businesses were limited, also due to external factors. The MSR brough however efficiency gains and reinforced enforcement capacity at Member States level.

4.1.2.3 Are the costs proportionate to the benefits?

The overall benefits and costs of the Regulation broadly equilibrate, but both remain relatively limited in magnitude. On the benefits side, the Regulation has improved efficiency of investigations, pooling of resources, coordination between national authorities, strengthened information exchange. However, the overall impact on reducing non-compliance has remained modest, as significant volumes of non-compliant products continue to enter and circulate within the EU market, particularly through e-commerce and imports from third countries. As a result, the gains in consumer protection, product safety, and fair competition have been relatively small compared to the scale of the problem identified in the IA.

At the same time, the costs generated by the Regulation have also remained limited. For businesses, the MSR introduced only targeted additional obligations, with most compliance requirements already stemming from sectoral product legislation rather than from the Regulation itself. Business stakeholders agree that the costs for economic operators are reasonable.[126] A smaller

[124] Ecorys, Capgemini, Rel-I (2026): Study supporting the evaluation of Regulation 2019/1020

[125] Based on information from the Joint Market Surveillance Action on Harmonised Products (JAHARP2021). The survey results gathered and processed under JAHARP2021 showed that 88% of MSAs were recovering costs under the authority of national rules developed before the introduction of Regulation (EU) 2019/1020 (Article 15), 10% were recovering costs under the authority of national rules developed after the introduction of Regulation (EU) 2019/1020 (Article 15) and 2% under procedures developed in response to Regulation (EU) 2017/1369 (Cl.5 of Article 8), which was only applicable to Energy Labelling.

[126] Out of 92 business respondents of the targeted survey, this is confirmed by 45 for Article 4, 45 for record-keeping and 37 for cooperation with MSAs.

set of responses to the public consultation and the call for evidence, identify the costs for authorised representatives for micro and small businesses as more burdensome than those for larger companies. For market surveillance authorities, implementation costs have been constrained by limited additional funding and resources at the national level. However, while the feedback from stakeholders, across all groups, to the public consultation suggests that MSR-related costs are considered reasonable, there is a perception that they are not shared evenly across all actors across the supply chains because non-compliant (often non-EU) operators avoid compliance obligations. On the other hand, authorities and consumer organisations report that the current resources of MSAs are insufficient to face the surge in e-commerce and flag that disproportional societal costs stem from non-compliance. MSAs also flag inefficiencies with ICSMS, including reporting obligations on key indicators in ICSMS, as a source of costs. Consequently, while the MSR created useful coordination mechanisms and support tools, both its regulatory burden and its measurable market impact have remained relatively modest.

4.1.2.4 What potential for simplification should be explored?

The MSR overall has potential for further simplification and cost reduction. Overall, 55% of respondents to the targeted survey (N= 275) consider that there is potential for further streamlining, against 7% considering the opposite.[127]

- **Digitalisation of market surveillance**

Potential for simplification and cost saving stemming from improving digital tools for market surveillance was identified as potential for simplification. Duplications in IT tools and their limited interoperability increases administrative burden for reporting and bears important costs (see Section 4.1.2.1). Digitalisation is one of the clearest areas of cross-stakeholder support, identified in the stakeholder consultations as a source of simplification and burden reduction. Stakeholders call for and upgrade of ICSMS and a better interconnection between existing databases like ICSMS, Safety Gate, and European Product Registry for Energy Labelling (EPREL). There is also a call from consumer and business representatives to invest in the full interoperability of these tools with the DPP, to automate compliance checks, and to integrate with the forthcoming EU Customs Data Hub. Public authorities suggest that ICSMS could evolve into a practical tool for managing product compliance throughout its lifecycle, with simplified and structured data collection.

In addition, stakeholders across all groups, including authorities, business representatives, and consumer organisations, share a strong consensus that AI and web crawlers are essential for increasing the efficiency of market surveillance in the digital age. These groups agree that such tools can significantly boost performance by automating the tracing of non-compliant products across complex online networks, conducting forensic image searches, automatising documentary inspections and identifying systemic risk patterns.

- **Simplification and efficiency gains through improved traceability of operators**

Potential for efficiency gains could also be found in a better identification of responsible EU based economic operators, notably linked to imports from third countries and e-commerce. MSAs perceive the current enforcement model as resource-intensive as authorities must pursue numerous sellers, often located outside the EU, to find a responsible economic operator, which makes the investigations last much longer and generates unnecessary costs. The survey respondents,

[127] Support is strongest among national business associations (80%, N=25), EU-level business associations (70%, N=23), consumer organisations (67%, N=6), and individual businesses (64%, N=42). Among authorities, 57% of other authorities responsible for product safety or compliance (N=21) and 48% of market surveillance authorities (N=141) see scope for simplification.

including business associations, individual businesses and MSAs, point to the need for a clearly identifiable responsible EO established in the EU, especially for distance sales, to increase efficiency of market surveillance.

Article 4 continues to be a key focus for stakeholders and source of possible simplification and efficiency gains. Some stakeholders (particularly business associations) call for simplifying it and reducing multiple categories of economic operators who can be responsible for a product into a single clear EU representative role. Others stress the importance of verification of the identity of these operators or the mandates they receive from foreign manufacturers, with some pointing to possible increased role of providers of OMs

Finally, some stakeholders (both authorities and businesses) advocated in the public consultation a broader and better use of risk-based approach that concentrates enforcement resources on high-risk products. These would allocate resources efficiently focusing on non-compliant traders with a poor track record (particularly online).

- **Improved cross-border cooperation procedures**

More efficient cross-border cooperation between authorities in different Member States could also generate efficiency gains and lead to simplification. A broad range of stakeholders consulted point to insufficient coordination and inconsistent implementation across Member States as a significant source of burden. In fact, lack of cooperation and efficient information exchange between authorities in different Member States duplicates work already performed, in turn increasing the overall costs of market surveillance in the EU. In these responses, simplification is often linked to a more consistent interpretation of rules, and stronger information-sharing between authorities. Business stakeholders tend to emphasise predictability, level-playing field and reduced duplications from checks across the EU, whereas authorities more often stress the need for stronger procedural arrangements.

4.1.3 Coherence

To what extent is the MSR internally coherent?

The MSR is overall internally coherent, but specific provisions require clarification, notably Articles 3 and 4 and of the EU MSR.

The application of Article 4 MSR is not uniform across harmonised products. Article 4.1 MSR spells out a key requirement: a product may be placed on the market only if there is an EU-based economic operator who is responsible for certain product-related tasks. Yet while the MSR applies to products subject to 70 Union harmonisation legislation, the requirement of Article 4.1 applies only to products subject to a subset of 5 Regulations and 15 Directives listed in Article 4.5. This makes the identification of which product is or is not subject to the requirement in Article 4.1 MSR complicated, creating an uneven enforcement landscape within the Regulation's own scope.[128]

The definition and duties of economic operators subject to Article 4 is not coherent. Article 3.13 of the MSR defines 'economic operator' as the manufacturer, the authorised representative, the importer, the distributor, the fulfilment service provider or any other natural or legal person who is subject to certain obligations. This said, not only, pursuant to Article 4.2 MSR, the requirement in Article 4.1 applies to a sub-set of economic operators — manufacturer, importer, authorised

[128] COM (2025) Evaluation study on the Implementation of Article 4 of Regulation (EU) 2019/1020 on Market surveillance and Compliance of products.

representative, fulfilment service provider — but such economic operators listed in Article 4.2 of the MSR are not subject to the same compliance related responsibilities.

To what extent is the MSR externally coherent?

The MSR operates alongside other acts affecting product compliance, most relevantly the General Product Safety Regulation (GPSR), the Digital Services Act (DSA) and the Union Customs Code (UCC). **While the MSR is overall coherent with the GPSR, its coherence with the UCC and the DSA may be further improved**.

This assessment is confirmed by the views expressed by the stakeholders in the targeted survey. Two thirds of the respondents (N=273) agree that the MSR is coherent with the GPSR[129]. While the predominant dominant view of 40% of respondents (N = 270) considers the MSR to be coherent with the DSA, there is a high uncertainty (as 38% of respondents does not know) and substantive disagreement (as 21% of respondents consider the MSR not to be coherent with the DSA).[130] While 38% of respondents (N = 272) considers the MSR to be coherent with the UCC, there is a very high uncertainty (as 44% of respondents does not know) and substantive disagreement (as 19% of respondents consider the MSR not to be coherent with the UCC).[131]

The MSR is closely related to and largely coherent with the GPSR. The MSR ensures the compliance of harmonised products. While the GPSR ensures the safety of non-harmonised consumer products, it may apply to harmonised products too, if certain safety aspects are not covered in Union harmonisation legislation. Moreover, the GPSR renders certain provisions of the MSR applicable to non-harmonised products. Article 16 GPSR makes Article 4 MSR applicable to non-harmonised products. Article 23 GPSR makes the certain other MSR provisions — including those related to the designation of MSAs, activities of MSAs, peer reviews, powers of MSAs, recovery of costs, market surveillance measures, procedural rights of economic operators, mutual assistance — applicable to non-harmonised products. At the same time, certain provisions of the GPSR such as Chapter IV on obligations of online marketplaces apply also to harmonised products. For this reason, as far as market surveillance activities, obligations, powers, measures, and cooperation among market surveillance authorities are concerned, the GPSR and the MSR have been aligned. **This creates, to a high extent, a coherent market surveillance regime in the EU concerning all consumer products.**

Yet there is margin to improve coherence further between the two acts. The GPSR goes in fact further than the MSR in certain aspects. For instance, Article 22 GPSR sets new obligations on OMs, which also apply to harmonised products, but only insofar as they are non-compliant because of safety reasons. Article 22 GPSR does not apply to harmonised products that are non-compliant for reasons other than safety. Also, while the GPSR empowers MSAs to issue take-down orders to

[129] Perceptions of coherence with the GPSR are broadly positive among authorities, with 66% (N=140) of MSAs and 60% (N=19) of other authorities responsible for product safety or compliance. Among private-sector stakeholders, positive assessments range from 56% (N=25) among national business associations to 64% (N=42) among individual businesses, while between 17% (EU-level business associations, N=24) and 40% (national business associations) consider the two instruments not coherent.

[130] Among authorities, 34% of MSAs (N=140) and 42% of other competent authorities (N=19) consider the Regulation coherent to at least some extent with the DSA. Among private-sector stakeholders, 60% of national business associations (N=25), 48% of EU-level business associations (N=23) and 49% of individual businesses positively assess coherence (N=41), while around one third consider the Regulation not coherent. Consumer organisations are the most critical, with 67% (N=6) reporting no coherence with the DSA.

[131] Coherence with UCC vary considerably across stakeholder groups. Among authorities, 89% of customs authorities (N=9), 38% of other competent authorities (N=18), and 30% of market surveillance authorities (N=140) consider the MSR coherent to at least some extent. Among private-sector stakeholders, 55% of EU-level business associations (N=24), 36% of individual businesses (N=42), and 30% of national business associations (N=25) share this view. However, 21% of EU-level business associations, 33% of individual businesses, and 11% of national business associations consider the Regulation not coherent at all. Uncertainty is particularly high among national business associations (59%) and market surveillance authorities (59%).

OMs for dangerous products (even requiring removal of identical content), the MSR allows OMs to do so only as last resort and to eliminate a serious risk and is silent regarding identical content.

The MSR also interacts with the DSA. The 2025 Commission Report on the application of Article 33 of the DSA and on the interaction of the DSA alignment with other EU acts found that 'the MSR and DSA have complementary provisions'.[132] On the one hand, the DSA sets certain due diligence obligations on OMs, including obligations to act upon orders issued by competent authorities, establish notice-and-action mechanisms for illegal content, and provide reasons for follow-up decisions. For Very Large Online Platforms and Very Large Online Search Engines, the DSA further require systemic risk assessment and mitigation measures. On the other hand, the MSR empowers MSAs to issue take-down orders as a last resort measure, to eliminate a serious risk and after fulfilling with procedural requirements. Also, Article 7.2 MSR mandates 'information society service providers' to cooperate with MSAs, upon request and in specific cases, to facilitate any action taken to eliminate or, if that is not possible, to mitigate the risks presented by a product that is or was offered for sale online through their services. Thus, while MSR governs compliance and enforcement with regard to individual products under Union harmonisation legislation, the DSA enforces at the systemic level for all matters relating to the supervision of OMs.

However, the two acts are not fully coherent. First, while the MSR is without prejudice to Articles 4 ('Mere conduit'), 5 ('Caching'), 6 (Hosting) and 8 (No general monitoring or active fact-finding obligations) of the DSA, the DSA allows Union legislation to establish more rules specifying complementing its framework. The DSA is without prejudice to the rules laid down by other Union legal — such as the MSR — regulating other aspects of the provision of intermediary services in the internal market or specifying and complementing the DSA. Second, the MSR neither explicitly covers providers of online marketplaces, nor does it impose of them obligations related to product compliance, while they play a key role in enabling the large-scale distribution of non-compliant products through high-volume e-commerce supply chains.

The MSR and the UCC complement each other and are broadly coherent. To ensure effective controls and compliance checks on products entering the Union market from third countries, the UCC provides the legal basis for compliance controls on products entering the Union market, Chapter VII of the MSR establishes a structured framework and procedures for cooperation between MSAs and customs authorities. The two acts jointly allow suspending the release for free circulation of products where non-compliance is suspected, pending verification by MSAs. Where MSAs conclude that a product cannot be placed on the market as it does not comply with the Union law applicable to it, they must require customs authorities not to release it for free circulation.

However, there is a scope for improving coherence between the UCC and MSR, in particular with respect to the definition, the roles and the responsibilities that the two acts provide in relation to importers. This aspect is going to be even more relevant in light of the EU customs reform, which amongst other plans to introduce the concept of importer for distance sales.

4.2 How did the EU intervention make a difference and to whom?

The MSR provided a common framework for market surveillance and presents a clear EU added value that goes beyond of what would have been achieved by the Member States acting alone. The harmonisation of the market surveillance system is achieved through setting up common rules for 27 national regimes with a single framework.

[132] EC (2025), Report on application of Article 33 of Regulation (EU) 2022/2065 (DSA) and the interaction of that Regulation with other legal acts.

Stakeholders are nearly unanimous in their acknowledgement of the EU added value of the MSR. The targeted survey provides strong quantitative support for the MSR's added value: 82% of respondents (N=277) agree or strongly agree that the Single Market would be negatively affected in the MSR's absence[133], and 83% (N=276) disagree that national-only approaches would be sufficient.[134] In fact, separate national approaches would create administrative burden and decrease overall effectiveness of the system.

The harmonised framework reduced the costs for businesses, including SMEs, of doing business across borders. MSR introduced a single, predictable set of market surveillance rules across the EU. Business stakeholders value this common framework as it helps distinguish them from "rogue traders" who benefit from avoiding compliance costs.[135] This is particularly important for SMEs, which typically have more limited financial and administrative resources to navigate differing national regulatory regimes and compliance procedures.

The MSR has contributed positively, although to a limited extent, to the protection of consumers' health and safety. As demonstrated by the results of the consultations, most stakeholders acknowledge the MSR's positive contribution to improved product compliance and safety, although its impact is limited (see Section 4.1.2.2). This has positive effects for consumers and society by improving health and safety outcomes, lowering healthcare and premature death costs or reducing financial detriment to consumers.

The MSR brought improvements and efficiency gains for the public authorities. In fact, 59% of authorities who responded to the targeted consultation (N=168) consider that the MSR allowed them to generate efficiency gains. In particular, 63% of authorities consider that the MSR has resulted in better pooling of expertise due to enhanced cooperation of MSAs at EU level through coordination mechanisms such as AdCos and the EUPCN (N=167).

Common EU level IT tools improved access to relevant data and boosted the exchange of information between MSAs. According to 57% of the MSAs in the targeted survey (N=168), ICSMS improved data sharing and increased efficiency of market surveillance.

Pooling resources through joint actions funded by the EU also provides additional benefits, particularly for smaller Member States lacking their own accredited laboratories.[136] While limited in scope, the joint actions allow for a reliable testing of selected products. The 2026 ECTI study for the European Parliament suggests that less well-equipped Member States test fewer products overall, and without the pooling mechanism provided by EUTFs and joint actions, these disparities would accentuate. [137]

The MSR has also contributed to the enhancement of the cooperation of MSAs within Member States and between Member States. Since the application of the MSR, Member States have broadly adapted their systems in ways that have strengthened coordination, including through the appointment of SLOs. (see Section 4.1.1.6). In sum, majority of respondent of the targeted survey (122 out of 233) consider that the Regulation has enhanced cooperation between competent

[133] Among authorities, 87% (N=142) of MSAs, 95% (N=20) of other authorities responsible for product safety or compliance and 82% (N=11) of customs authorities agree with the statement. Among private-sector stakeholders, agreement reaches 79% (N=24) among EU-level business associations, 67% (N=24) of national associations and 62% (N=42) among individual businesses. 100% (N=6) of consumer organisations agree that the Single Market would be negatively impacted in the absence of the MSR.

[134] This view is shared across all stakeholder groups, including 100% (N=6) of consumer organisations, 91% (N=24) of EU-level business associations, 90% (N=42) of individual businesses, and 80% (N=141) of MSAs.

[135] COM (2025) Evaluation study on the Implementation of Article 4 of Regulation (EU) 2019/1020 on Market surveillance and Compliance of products

[136] European Parliament (2023) Market surveillance for effective consumer protection in the EU

[137] ECTI (2026) Financing the Enforcement of EU Product Compliance at External Borders (European Parliament, PE 772.643, 2026).

authorities within Member States. This was achieved by standardising the role of customs authorities and their cooperation with MSAs. EU level coordination structures such as SLOs, the EUPCN, expert groups and AdCos play a central role in strengthening cooperation and knowledge sharing between authorities (see Section 4.1.1.6).

Evidence[138] supports the finding that cross-border enforcement challenges cannot be effectively addressed through national legislation alone. Only a coordinated EU-level framework can ensure consistent enforcement across Member States and at external borders, preventing non-compliant products from exploiting regulatory arbitrage between national systems. Because there are no internal borders, shortcomings in one national system affect the entire Union, as non-compliant products can circulate freely once they enter any point of the EU, which is why EU action is needed to establish harmonised approaches that cannot be achieved through fragmented national measures.

4.3 Is the intervention still relevant?

4.3.1 General relevance of MSR objectives

The MSR's general and specific objectives remain relevant, but the core problems the Regulation was designed to address (non-compliant and dangerous products on the Single Market, uneven enforcement across Member States, and the need for cross-border cooperation) have intensified rather than receded. The results of the public consultation support these findings relating to the MSR general objective, with 137 out of 154 respondents agreeing or strongly agreeing that the MSR's general objective remains relevant. Specific objectives are overwhelmingly endorsed by the stakeholders ranging between 76–82% (N=277).

The three specific objectives all remain pertinent, but the challenges they were designed to address have evolved significantly since adoption: SO1 (enforcement toolbox) needs to address new dynamics such as the rapid surge and complexity of business models that fall outside the current regulatory framework; SO2 (enforcement capacity) must contend with a surge in workload that was not foreseen at the scale now observed; SO3 (cooperation) faces a growing mismatch between nationally-based enforcement structures and challenges that are increasingly EU-wide in scope and origin.

While its objectives remain highly relevant in addressing contemporary market challenges (e.g. e-commerce growth, cross-border trade, and resource disparities), their achievement could be assessed as partial and uneven (see Section 4).

4.3.2 Do the objectives and provisions of the MSR still match current needs of stakeholders and the internal market?

The objective of strengthening the enforcement toolbox remains relevant. The rise of e-commerce and the increasing complexity of global supply chains created enforcement gaps that existing regulatory tools cannot address. The MSR's provisions, including Article 14(4)(k) (website takedowns), Article 4 (EO obligations), and cost-recovery mechanisms (Article 15), address n enforcement needs, but their practical application has revealed limitations (see Section 4.1.1.4).

The objective of addressing fragmented and insufficiently coordinated market surveillance across Member States remains highly relevant. The need for coordinated market surveillance remains critical, given the increasingly cross-border nature of trade. The MSR's mechanisms

[138] The JACOP 2024 joint action, involving 48 MSAs across 28 countries, demonstrated that coordinated EU-level enforcement identifies cross-border non-compliance patterns that individual Member States would not detect in isolation.

(SLOs, EUPCN and AdCos) address a genuine gap in the pre-MSR framework and are necessary. However, their effectiveness is constrained by operational and systemic limitations (see Section 4.1.1.6). The EP study also identifies a mismatch between nationally based enforcement models and enforcement tasks that have increasingly European scope, origin and impact.[139]

The objective to ensure sufficient operational enforcement capacity also remains highly pertinent. The MSR's emphasis on Union testing, digital tools, and efficiency gains through cooperation remains a relevant response to the continued enforcement constraints. However, the scale of enforcement needs has outpaced available capacity in many Member States (see Section 4.1.1.5 on resources).

4.3.3 To what extent do the issues addressed by the Regulation continue to require action at the EU-level?

The evidence suggests that the issues addressed by the MSR will continue to necessitate action at EU level in the future. Product non-compliance and dangerous goods remain a pervasive issue across the Single Market.[140] Indeed, the 2025 evaluation of Article 4 indicates that the issues addressed by the MSR are increasingly pertinent[141] due to the rapid growth in e-commerce.

Feedback from stakeholders' signals that there is almost a consensus among respondents to the public consultation that continued action at the EU level is required. The public consultation indicates that 144 out of 154 respondents agree or strongly agree with this statement. The targeted survey also confirms this near-unanimity, with 88% of respondents agreeing (66% strongly, N=180) that the MSR's objectives continue to require EU-level action.[142]

The need for EU-level action stems from the inherently cross-border nature of product compliance and safety challenges. As indicated in Section 3.1, the volume of low-value imports linked to e-commerce has increased sharply in recent years. When asked how they expect the number of non-compliant imported products to evolve without further policy action, 80% of respondents to the targeted survey anticipate fast growth (N=98).

4.3.3 Is the MSR sufficiently adaptable to new challenges and developments?

The MSR is only partially adaptable to new challenges and developments. It was designed for relatively simple supply chains with identifiable EU-based EOs and is structurally ill-suited to address challenges stemming from e-commerce.

Respondents to the targeted survey assess the MSR as not adapted to the key e-commerce market developments. These in particular relate to growth of third-country direct sales (79% of stakeholders, incl. MSAs, business and consumer organisations, considers MSR not adaptable, N=273)[143], to novel online selling models (76%, N=273)[144], to e-commerce growth (76%,

[139] ECTI, Financing the Enforcement of EU Product Compliance at External Borders (European Parliament, PE 772.643, 2026).
[140] European Parliament (2018) Strengthening market surveillance of harmonised industrial products.
[141] COM (2025) Evaluation study on the Implementation of Article 4 of Regulation (EU) 2019/1020 on Market surveillance and Compliance of products.
[142] Agreement is widespread across stakeholder groups. Among authorities, 85% (N=139) of MSAs, 80% (N=20) of other authorities responsible for product safety or compliance and 91% (N=11) of customs authorities agree with the statement. Among private-sector stakeholders, agreement reaches 100% (N=24) among EU-level business associations, 92% (N=24) among national business associations and 95% (N=42) among individual businesses. Need for EU action is also acknowledged by 100% of consumer organisations (N=6).
[143] Negative assessments are particularly pronounced among consumer organisations (100%, N=6), EU-level business associations (100%, N=23), national business associations (96%, N=25), and individual businesses (83%, N=42). Among authorities, 71% of MSAs (N=139), 75% of other authorities responsible for product safety or compliance (N=20) and 50% of customs authorities report that the Regulation has not at all been adaptable (N=10).

N=274)[145] and increased imports (75%)[146]. Adaptability to complex products and new digital tools receives somewhat less negative assessments (58% and 47%, respectively)[147]. Stakeholders who took part in the Call for Evidence emphasise that the MSR is currently unable to cope with the explosive growth of global e-commerce, as the current model was designed for linear supply chains and is structurally ineffective against the massive volume of fragmented consignments from third countries.

5. WHAT ARE THE CONCLUSIONS AND LESSONS LEARNED?

5.1 Conclusions

The MSR has not fully fulfilled its general objective. It has expanded MSAs' regulatory toolbox, to a limited extent increased enforcement capacity (through ICSMS and EUTFs), improved coordination at national level (through SLOs) and embedded necessary institutional coordination at EU level. However, its general objective – ensuring only compliant products circulate on the Single Market – remains not fully unmet, also due to external factors linked to a surge in e-commerce. Taking into account data limitations (see Section 1.1), the number of non-compliant products remains high (53% of completed ICSMS investigations in 2025), which puts health and safety of consumer at risk and undermines a level playing field for compliant businesses.

Regarding specific objective 1, while the MSR has strengthened the regulatory toolbox at disposal of MSAs to enforce Union harmonisation legislation, it remains incomplete, particularly in digital markets and for products imported from third countries. The main constraint is the limited enforceability of Union harmonisation legislation in complex, cross-border and online supply chains. The current regulatory framework does not enable MSAs to effectively detect and address instances of product non-compliance due to three main factors: i) difficulty in identifying the responsible economic operator for the products at issue; ii) insufficient product compliance responsibilities of economic operators commensurate to their role in the supply chain; and iii) lack of powers of MSAs to enforce such rules and responsibilities. Furthermore, Article 4 applies only to products subject to 20 of the 70 pieces of Union harmonisation legislation covered by the MSR, leaving a significant enforcement gap. Providers of online marketplaces do not fall within the definition of economic operators and are subject only to limited cooperation obligations under the MSR.

While Article 4 has strengthened the framework in legal terms by introducing a clear requirement that certain products may only be placed on the EU market if a responsible EO

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[144] Negative assessments are particularly pronounced among consumer organisations (100%, N=6), EU-level business associations (88%, N=24), national business associations (92%, N=25), and individual businesses (85%, N=41). Among authorities, 70% of MSAs (N=139) and customs (N=10) and 65% of other authorities (N=20) report that the Regulation is not adaptable to novel ways of selling products online.

[145] The perceived lack of adaptability to the increase in e-commerce is most pronounced among consumer organisations (100%, N=6), EU-level and national business associations (92% each, with N=24 and N=25, respectively), individual businesses (79%, N=42), and customs authorities (90%, N=10), while 68% (N=139) of MSAs and 70% (N=20) of other authorities also consider that the Regulation has adapted only to some extent or not at all.

[146] Negative assessments are strongest among consumer organisations (100%, N=6), national business associations (96%, N=25) and EU-level business associations (96%, N=23), followed by individual businesses (81%, N=42) and customs authorities (80%, N=10). Among MSAs, the share is lower but still a substantial majority (65%, N=140).

[147] Negative assessments on the adaptability to complex products are most pronounced among consumer organisations (83%, N=6) and EU-level business associations (71%, N=24), followed by MSAs (61%, N=138) and customs authorities (60%, N=10). Lower shares are observed among national business associations (48%, N=25), and individual businesses (43%, N=42). On the adaptability to new digital technologies, shortcomings are most pronounced among customs authorities (70%, N=10), consumer organisations (67%, N=6), and EU-level business associations (67%, N=24). A lower share of national business associations (52%, N=25), other competent authorities (50%, N=20), and MSAs (47%, N=139) report that the Regulation has adapted only to some extent or not at all, while individual businesses are comparatively less critical (31%, N=42).

is established in the Union, its practical enforcement is limited. MSAs encounter difficulties to identify the responsible economic operators and hold them accountable for the product compliance-related responsibilities under this provision, particularly for products sold online from third countries. In addition**,** Article 4 of the MSR applies only to products subject to 20 of the 70 pieces of Union harmonisation legislation covered by the MSR, leaving an enforcement gap in remaining harmonised sectors.

There are limited product compliance obligations for providers of online marketplaces (OMs) under the MSR. The MSR currently contains only a general cooperation obligation for OMs to cooperate with MSAs on individual product listings, and to facilitate actions to eliminate or mitigate the risks presented by a product that is or was offered for sale online through their services.

MSAs do not dispose of sufficient powers required to effectively address non-compliance of products, notably in e-commerce to prevent their reappearance.

Penalties remain a weak element of the toolbox in practice. Although all Member States have established national penalty regimes, their level and application vary widely, and penalties are often not dissuasive enough to deter non-compliance. Only 25% of public consultation respondents found penalty regimes dissuasive (N=154), the estimated collection rate is around 50%, and cross-border and third-country collection is near zero.

Regarding specific objective 2, enforcement capacity of market surveillance authorities is insufficient and uneven across the Union.

The market surveillance system remains underfunded. Market surveillance is also persistently understaffed, with a large dispersion in staffing levels across countries. The total EU-27 market surveillance budget stood at approximately EUR 150 million in 2022 (excluding staff costs), with essentially no real growth over 2021–2025. Staffing across the EU totals around 10,000 FTEs, with a marginal decline of -0.1% over the period. This contrasts sharply with the enforcement challenge: in 2024, customs were able to control the product compliance of only 0.0082% of all imported products.

Interoperability gaps and uneven use of common EU tools significantly constrain the effectiveness of digital enforcement tools. While ICSMS and Safety Gate are increasingly used and seen as valuable to support market surveillance, their impact is constrained by an uneven uptake across Member States and persistent interoperability gaps with national systems and other EU databases, leading to duplications and administrative burden.

Testing capacity remains limited and concentrated in a small number of Member States and product categories.

Regarding specific objective 3, cooperation within Member States has improved since the entry into force of the MSR, yet some national systems face substantial challenges stemming from institutional and procedural setup. In addition, while cross-border cooperation between MSAs improved since MSR, it remains insufficient and uneven.

The MSR has strengthened internal coordination within Member States through more centralised national governance, particularly via SLOs but complexity remains high in some Member States. Following the MSR's introduction, Member States have broadly adapted their national market surveillance systems towards more coordinated and centralised arrangements. However, the fragmentation of national structures makes cooperation between relevant authorities, within and amongst Member States, difficult. Cooperation between MSAs and customs authorities is essential for enforcement but remains constrained by procedural complexity, capacity limitations and limited IT integration.

Cross border cooperation has not been sufficiently strengthened via EU-level coordination mechanisms, such as EUPCN or joint actions. Current mechanisms operate on an ad hoc and voluntary basis. In addition, currently joint actions present some procedural deficiencies limiting their effectiveness. Quantitatively, only 13% of investigations are conducted jointly across Member States, and each MSA participates in only approximately 4.3 collaborative actions per year on average. In 2025, only 47 enforcement requests were sent across all 14 responding countries, with cross-border handling involved in only 1.7% of ICSMS investigation cases (taking into account data limitations – see Section 1.1).

The overall benefits and costs of the Regulation broadly equilibrate, but both remain relatively limited in magnitude. Compliance costs attributed to MSR are negligible for economic operators, as most of total compliance costs stem from sectoral legislation. The costs for MSAs remain stable, also reflecting limitations in resources for market surveillance. Annual MSR compliance costs for businesses are estimated at 0–0.03% of turnover (vs 0.05% anticipated in the IA). EU-level market surveillance costs amount to EUR 17.3 million in 2026. ICSMS efficiency gains for MSAs are estimated at EUR 150,000–1 million per year, and the cost recovery rate has quadrupled from 2.4% in 2019 to 10% in 2021.

The MSR provided a common framework for market surveillance presenting a clear EU added value that goes beyond of what would have been achieved by the Member States acting alone.

The MSR's general and specific objectives remain relevant, but the core problems the Regulation was designed to address (non-compliant and dangerous products on the Single Market) have intensified rather than receded. The MSR is only partially adaptable to new challenges: 79% of stakeholders consider it not adapted to the growth of third-country direct sellers, and 76% consider it not adapted to novel online selling models or the exponential growth of e-commerce.

The MSR is overall coherent internally and to a large extent externally, but potential for improvement remains. Specific internal coherence issues identified include: the mismatch between the MSR's scope (70 pieces of Union harmonisation legislation) and the narrower scope of Article 4.5 (about 20 pieces), inconsistencies between Article 3(13) and Article 4.2 regarding which economic operators bear product compliance responsibilities, and the confusion between customs 'importers' and product compliance 'authorised representatives' in B2C e-commerce, which undermines the effectiveness of Articles 25–28 MSR.

5.2 Lessons learned

The problems and needs that triggered the original intervention have not been resolved and have intensified in the online environment. Three structural lessons stand out:

- regulatory toolkit is not yet fit for purpose for MSAs to effectively detect and address product non-compliance, especially in relation to imports from third countries and e-commerce.
- there is insufficient and uneven enforcement capacity compared to the rapidly increasing workload.
- cooperation within and between Member States remains challenging, while cross-border mechanisms are underused relative to its potential.

Closing existing regulatory gaps and strengthening the powers of market surveillance authorities are essential to ensuring an effective market surveillance system. In particular, evolving supply chains, online sales channels, and the growing presence of non-EU economic operators require authorities to have clear and robust enforcement powers across all distribution channels.

At the same time, regulatory improvements need to be matched by a substantial reinforcement of the operational capacity of market surveillance authorities. Adequate staffing, technical expertise, financial resources, and IT tools are necessary to ensure that authorities can effectively exercise their expanded responsibilities in practice.

While the existing cooperation architecture has demonstrated clear operational value, its effectiveness depends on sustained and structured participation by all actors involved. Continued engagement will be necessary to ensure effective information exchange, coordinated enforcement, and long-term cooperation across Member States.

Finally, additional efforts should be done to collect reliable administrative data on market surveillance, to enable a better analysis of market surveillance in the EU and enforcement at EU level under the MSR and other legislation (e.g. systemic enforcement in the DSA). MSAs need to dispose of a fully digital state-of-the-art tool to record and exchange enforcement information, eliminate reporting duplications, and benefit of interconnection with the EU systems.

Simplification and efficiency gains can be achieved through:

- digitalisation (interoperable IT tools, AI-powered enforcement tools),
- simplification and efficiency gains through improved traceability of operators
- better coordination among authorities and at EU level, especially in a cross-border context
- legal simplification of relevant product compliance legislation.

ANNEX I. PROCEDURAL INFORMATION

1. LEAD DG, DECIDE PLANNING/CWP REFERENCES

Lead DG: DG Internal Market, Industry, Entrepreneurship and SMEs (DG GROW)

Directorate: Directorate H – Construction, Machinery and Market Surveillance

This evaluation corresponds to the initiative with the Decide reference PLAN/2026/1664 for the Revision of Regulation (EU)2019/1020 on market surveillance and compliance of products

2. ORGANISATION AND TIMING

The call for evidence feedback and the public consultation period ran from 12 November 2025 to 4 February 2026.

An interservice coordination group was convened and chaired by DG GROW. The following Directorates-General participated: SG, LS, BUDG, CLIMA, CNECT COMP, DIGIT, ENER, ENV, JRC, JUST, MOVE, SANTE, TAXUD and TRADE. The ISCG met 4 times. The last meeting on was held on 5 May 2026.

3. CONSULTATION OF THE RSB

The RSB was consulted in an informal upstream meeting on 23 September 2025. This evaluation assessment was submitted to the RSB on 20 May 2026. The meeting with the RSB took place on 17 June 2026. Following the opinion of the RSB, covering both this Evaluation and the related Impact Assessment as part of a back-to-back package, changes were made to the two documents in order to reflect the recommendations of the Board. The opinion and the explanations of how the RSB recommendations were addressed will be published when the proposal for a revision of the MSR is adopted.

4. EVIDENCE, SOURCES AND QUALITY

This evaluation is supported by a complementary study undertaken by an external contractor, who was responsible for conducting the interviews, systematically analysing data gathered from both public and targeted stakeholder consultations, and strengthening these findings through additional desk research. This combined methodological approach allowed for a more comprehensive understanding of the subject matter by integrating qualitative insights from stakeholders with relevant secondary data sources, thereby improving the robustness and credibility of the overall assessment.

ANNEX II. METHODOLOGY AND ANALYTICAL MODELS USED

The analytical work underpinning this evaluation relied primarily on the support study carried out by the external contractor on behalf of the Commission. The study was conducted in line with the Better Regulation Guidelines and the requirements set out in the Terms of Reference and aimed to provide a robust and comprehensive assessment of the implementation and performance of the intervention.

The contractor developed a methodological framework during the inception phase, including the intervention logic, evaluation matrix and points of comparison used to structure the evidence gathering and analysis. The study assessed both the evolution of the regulatory and market context over the evaluation period and the extent to which the intervention achieved its objectives under the Better Regulation evaluation criteria. Particular attention was given to issues related to e-commerce, non-compliant imports from third countries, enforcement practices across Member States, administrative burden for economic operators – especially SMEs – and broader market developments linked to digitalisation.

The contractor's methodology combined several complementary analytical methods and evidence sources. Desk research constituted a core and continuous component of the study. It included the review of legislation, policy documents, implementation reports, statistical data, academic literature, previous evaluations and other relevant studies, as well as grey literature such as reports and position documents from business associations, consumer organisations, and other sources.

In parallel, the contractor built on extensive stakeholder consultation activities, including a Call for Evidence and a public consultation run by the European Commission. The contractor complemented these consultations with targeted surveys, a dedicated data request to market surveillance authorities, interviews, and a validation workshop. These consultation activities gathered qualitative and quantitative evidence from a broad range of stakeholders, including economic operators and their representatives, market surveillance authorities, customs and public authorities, consumer organisations and civil society organisations.

The contractor's methodology also included developing four case studies to illustrate specific implementation and enforcement issues in practice. The case studies provided more detailed qualitative and quantitative insights into how the Regulation functions in concrete situations across different sectors, product categories and national contexts. In particular, they examined practical experiences related to market surveillance activities, cross-border cooperation, enforcement challenges in e-commerce and online sales, the treatment of non-compliant products originating from third countries, and the administrative implications for economic operators, including SMEs. The case studies complemented the broader analytical findings by providing contextual evidence and concrete examples of how the intervention operates in practice.

The Commission services closely monitored and assessed the contractor's work throughout the study. Regular exchanges took place to discuss methodological choices, the availability and quality of evidence, preliminary findings and emerging analytical issues. The continuous supervision and review by the Commission services, including iterative feedback on methodological and analytical outputs and consistency checks, contributed to ensuring the transparency, coherence and robustness of the study results. Overall, the Commission considered the contractor's work to be sufficiently robust to support the evaluation. The Commission agreed with the main findings and conclusions of the study, while in certain areas, additional caution was applied when interpreting

results affected by limited evidence, data gaps or diverging stakeholder views. In some cases, the Commission complemented the contractor's analysis with additional cross-checking against other available evidence sources and recent policy developments.

The study nevertheless faced data limitations, also due to the relatively limited time elapsed since the legislation entered into force. First, the contractor encountered important data limitations, particularly concerning the quality and comparability of available ICSMS data. Existing datasets did not allow for a full assessment of market surveillance performance across Member States. Furthermore, significant data cleaning and harmonisation efforts were required because enforcement measures were recorded inconsistently and in different languages across Member States. In many areas, the evidence base is constrained by the short timespan since the entry into force of the MSR, as some of the available data covers only a few years.

The contractor implemented several mitigating measures to address these limitations. Data gaps were mitigated through methodological triangulation, systematically cross-checking findings across multiple evidence sources, including desk research, consultation activities, case studies and available statistical evidence. Where quantitative evidence was incomplete or uncertain, qualitative evidence and stakeholder input were used to contextualise findings and support the analysis. Conclusions were formulated cautiously where significant uncertainty remained.

Overall, despite the identified limitations and uncertainties, the contractor's study provided a sufficiently robust and credible evidence base for the evaluation. The combination of multiple evidence sources, complementary methodologies, stakeholder consultation activities and quality assurance measures strengthened the reliability and consistency of the analytical findings underpinning this evaluation.

ANNEX III. EVALUATION MATRIX

No	Sub-question	Judgement criteria	Indicators	Sources	Methods
Q1. What markets are covered by the Regulation and what trends are observable?					
Q1.1	Evolution of the market of products subject to the Regulation	*(providing data; no evaluative judgement made)*	- Official statistics (imputed, processed where necessary) or quantitative estimates for EU production volumes and value in euro, market shares - Intra-EU trade in goods: volumes, values - Imports of goods from third countries (linked to Q1) - Specific breakdown related to harmonised goods - E-commerce data (volume of online sales), trends over time: breakdowns to larger product groups and concentration in Member States - Significance (in terms of total trading volumes in the EU) of large companies and online sales platforms over time (partly qualitative, if no reliable figures can be found)	- E-commerce and international trade statistics (Eurostat): sales, import volumes by NACE and PRODCOM/COMEXT, volume of sales via online channels - Safety Gate and ICSMS (to identify high-risk product types) - DSA transparency or company reporting by key online platforms, i.e. e-commerce VLOPs: AliExpress, Amazon, Shein/Infinite Styles, Temu/Whaleco. Zalando Available e-commerce market data (on sales volumes, breakdowns by business models etc.)	- Identification of high-risk product groups from SG and ICSMS - Descriptive statistics - Trend analysis
Q2. How has the Regulation been applied by Member States?					
Q2.1	How has the Regulation been implemented by different Member States?	- Extent to which MSR provisions have been operationalised by in national legislation - Mapping of differences in national	- Coverage of relevant key MSR provisions (requiring or enabling MSs and national authorities to act) in national law/measures operationalising the MSR:	- Previous evaluation, Impact Assessment, Evaluation Study on Article 4 - MSR and national legislation	- Comparative legal analysis (tabular and complementing narrative) - Desk

No	Sub-question	Judgement criteria	Indicators	Sources	Methods
		approaches to implementation - Extent to which national implementation has been challenged/confirmed via European case law, key national case law	assessing the 'completeness of implementation' (fully, partially, not implemented), by MS (with relevant legislation) - Classification of approaches to implementing MSR in national law (differences) - Proportion of MSAs/customs that have been assigned individual powers set out in MSR - Identification of changes in legal implementation since last evaluation	- Predecessor regulation - Information request to MSA, customs authorities (feedback on powers used) - Interviews with national authorities, SLOs	research/literature review (classifications, examples for gold plating) - Classifying qualitative feedback on MS implementation approaches and context
Q2.2	What are the **penalty** regimes and other sanctions established in the Member States?	- Differences in the levels and types of penalties and the conditions for their enforcement in legislation set by each Member State	- Availability and form of the established penalty regimes in the Member States - Differentiation of penalties per product sector	- MSR and national legislation - Information request to MSA/customs authorities (data on penalties, corrective action) - Interviews	- Desk research (evaluation report, national legislation) - Quantitative analysis of data obtained through the request: breakdowns by MS - Classification of qualitative feedback
Q3. Effectiveness: How effective was the Regulation in achieving its objectives?					
Q3.1	To what extent has the MSR contributed to achieving its **general objective?**	- Degree to which the MSR has contributed to **increased compliance with EU product legislation**	- Number (and trends) of investigations finding non-compliant products on the EU Market - Number (and trends) of investigations finding non-compliant products upon their	- ICSMS (e.g., ICSMS documents) - JRC Indicator studies - Monitoring and enforcement reports from MSAs - Public consultation	- Analysis of consultation outputs - Desk research/literature review - Descriptive statistics

No	Sub-question	Judgement criteria	Indicators	Sources	Methods
			entry into the Single Market. - Non-compliance rates by Member State, and by sector - Proportion of non-compliant cases resulting in corrective actions by EOs (online vs offline) - Stakeholder feedback regarding how the MSR has contributed towards increased compliance with EU product legislation	- Stakeholder interviews (Consumer organisations; representative of EOs) - Survey data	- Trend analysis of quantitative indicators - Comparison between intended objectives of the regulation and how it evolved
		- Extent to which the MSR has contributed to **improved health and safety of consumers**	- Number of products found to be presenting a risk (online vs offline products) - Number of Safety gate alerts on products (by region/product type) - Stakeholder feedback regarding enhanced consumer health and safety protection as a result of the regulation - Stakeholder feedback regarding safety of products bought online versus offline	- ICSMS investigations data - Safety Gate annual reports (alerts by country, product category and type of risks) - Monitoring and enforcement reports from MSAs - Reports by NGOs/non-profits (e.g., BEUC, ProSafe reports) - GPSR Impact Assessment study - Relevant EC publications (e.g. Biannual consumer conditions scoreboard) - Public consultation and targeted survey	- Analysis of consultation outputs - Desk research/literature review - Descriptive statistics - Trend analysis of quantitative indicators - Comparison between intended objectives of the regulation and how it evolved
		- Extent to which the regulation contributed to **fairer competition, a level playing field, and increased competitiveness**	- Variation in non-compliance rates by Member State, sectoral trends and comparison to third countries - Stakeholder feedback regarding	- Safety Gate annual reports (alerts by country, product category and type of risks) - Case study on online	- Analysis of consultation outputs - Desk research/literature

No	Sub-question	Judgement criteria	Indicators	Sources	Methods
			regulatory requirements creating disproportionate or unjustified barriers to trade - Stakeholder perception regarding regulation creating increased competitiveness for regulation-abiding companies would be improved due to reduced unfair competition from non-compliant products - Stakeholder perceptions regarding impact of the regulation on fair competition, a level playing field and increased competitiveness	marketplaces - Eurostat (e.g. Intra – Extra EU trade per Member State) - Industry group reports (e.g. CCIA, 2022, Product Safety: Deal on New EU Rules Adds Complexity for Online Marketplaces in Europe) - Public consultation[5,6] - -Stakeholder interviews (Consumer organisations; representative of EOs) - Survey data	review - Inputs from case studies - Variation analysis - Comparison between intended objectives of the regulation and how it evolved
Q3.2	To what extent is the **regulatory toolbox strengthened,** establishing rights and obligations, and conferring powers to MSAs to use more deterrent, effective and future-proof tools (SO1)	To what extent are the powers of MSAs adequate to effectively detect and address product non-compliance?	- Reported use and effectiveness of powers conferred to require information from EOs, both offline and online (Article 14(4)) - Reported use and effectiveness of powers conferred to carry out inspections and investigations, established under Article 14 (4), both vis-à-vis products available online and offline - Reported use and effectiveness of enforcement powers, both offline and online, established under Article 14(4)[8] - Share of inspections resulting in corrective actions being taken by relevant EOs - Evidence of the application of	- ICSMS data - Monitoring and enforcement reports from Member States - Stakeholder Interviews - Targeted Survey data - Public consultation	- Desk research/literature review - Analysis of consultation outputs - Reported use and effectiveness of enhanced enforcement power will be quantified if and where possible as the share of MSAs applying each power and the intensity of use (e.g., number of actions/cases per year) and success rate (e.g., proportion

No	Sub-question	Judgement criteria	Indicators	Sources	Methods
			penalties and sanctions and their deterrence effects - Stakeholder perceptions on the clarity and sufficiency of each power - Stakeholder satisfaction with the powers of MSAs - Stakeholder feedback regarding how effectively MSAs can address non-compliance in distance sales		leading to confirmed non-compliance or corrective measures). - Comparison between intended objectives of the regulation and how it evolved
		Use of corrective measures by MSAs	- Frequency and scope of corrective actions applied by MSAs - Number and type of barriers identified for requiring corrective measures to EOs - Stakeholder feedback regarding corrective actions being followed through by EOs	- Monitoring and enforcement reports from Member States - ICSMS - Stakeholder Interviews - Survey data - Public consultation[10]	- Analysis of consultation outputs - Desk research/literature review
		Rights and obligations of economic operators	- Market surveillance reporting indicating whether the absence of an EU based responsible operator is a recurring issue - Market surveillance reporting of cases where EO responsibilities are unclear or disputed - Market surveillance reporting of authorities successfully obtaining documentation or cooperation from authorised representatives	- ICSMS (e.g., ICSMS documents) - Monitoring and enforcement reports from Member States - Stakeholder Interviews - Survey data - Public consultation[11,]	- Analysis of consultation outputs - Desk research/literature review - Comparison between intended objectives of the regulation and how it evolved

No	Sub-question	Judgement criteria	Indicators	Sources	Methods
			- Evidence of reduced delays or obstacles in enforcement actions involving non-EU manufacturers (qualitative or trend-based where possible) - Evidence that EOs take corrective action as required by MSAs Stakeholder feedback on: - the legal, procedural, or practical barriers to enforcing Article 4, - the clarity, sufficiency, and effectiveness of EO tasks in ensuring compliance and safety - the effectiveness of cooperation with online platforms		
Q3.3	To what extent has the MSR improved operational **enforcement capacity and resources?** (SO2)	Operational enforcement capacity	- Number of investigations (by Member State, product/sector) according to market size - Stakeholder feedback of MSAs' technical expertise and capacity to perform their regulatory tasks. - Stakeholder feedback regarding allocation of resources	- ICSMS - JRC studies on resources - Interviews - Public consultation[12] - Targeted survey data	- Analysis of consultation outputs - Desk research/literature review - Descriptive statistics - Trend analysis of quantitative indicators - Comparison between intended objectives of the regulation and how it evolved

No	Sub-question	Judgement criteria	Indicators	Sources	Methods
		Human and financial resources	- Sufficiency of budget and staff dedicated to market surveillance: trends, analysis - Testing capacity - Comparability of resources dedicated across Member States - Stakeholder perception regarding how resources are allocated - Stakeholder perceptions regarding ability of MS to perform adequate controls given the available resources	- ICSMS (e.g., ICSMS documents) - Monitoring and enforcement reports from Member States - JRC reports - Stakeholder Interviews and reports - Targeted Survey data - Public consultation [13]	- Analysis of consultation outputs - Desk research/literature review - Trend analysis of quantitative indicators - Comparison between intended objectives of the regulation and how it evolved
		Testing Capacity	- Composition of checks performed by Member States and MSAs, relating to the product sectors tested - The number and type of tests performed by Member States and MSAs - Stakeholder perception on the value of EUTFs - Stakeholder perception on the availability of testing capacity	- JRC Study - European Parliament Study - Public consultation - Targeted survey	- Analysis of consultation outputs - Desk research/literature review - Trend analysis of quantitative indicators - Comparison between intended objectives of the regulation and how it evolved
		IT tools and digitalisation	- Usage of ICSMS and Safety Gate - Stakeholder feedback regarding how effectively tools provide useful and accessible information relating to the enforcement of EU	- ICSMS - Safety Gate - JRC indicator report - Public consultation[14]	- Analysis of consultation outputs - Desk research/literature review

No	Sub-question	Judgement criteria	Indicators	Sources	Methods
			product rules - Stakeholder feedback regarding interoperability and of interconnectedness of market surveillance tools	- Stakeholder Interviews - Survey data - Monitoring and enforcement reports from Member States - European Parliament Study	- Inputs from case studies (Fragmentation and governance; Toys and consumer electronics imports) - Trend analysis of quantitative indicators
Q3.4	To what extent has the MSR achieved **reinforced cooperation procedures**? (SO3)	- Extent to which the regulation has led to enhanced cooperation between competent authorities across Member States	- Number and outcome of joint surveillance activities (joint actions, joint activities and peer reviews) - Usage of mutual assistance mechanisms by MSAs (number and outcomes) - Requests for information + requests for enforcement actions - Evidence of cross-border non-compliance cases resolved through EU mechanisms - Stakeholder feedback regarding enhanced cooperation between competent authorities - Stakeholder perceptions regarding the effectiveness of mutual assistance mechanisms - Stakeholder perceptions regarding the effectiveness of joint actions - Extent to which the Single Liaison Offices, the EUPCN, expert groups and the AdCos have	- ICSMS (e.g., ICSMS documents) - JRC indicator studies - Reports by NGOs/non-profits (e.g., ProSafe reports) - AdCo reports (e.g., Report on the 16th Joint Cross-Border EMC Market Surveillance Campaign 2024) AdCo reports (e.g., Report on the 16th Joint Cross-Border EMC Market Surveillance Campaign 2024) - Data requested through AdCos/PCPs - Reports on Coordinated Activities on the Safety of Products - CASP (e.g. CASP 2022) - New database on joint actions - Public consultation[16] - Stakeholder interviews	- Analysis of consultation outputs - Desk research/literature review - Comparison between intended objectives of the regulation and how it evolved - Inputs from case studies (Fragmentation and governance; Toys and consumer electronics imports)

No	Sub-question	Judgement criteria	Indicators	Sources	Methods
			enhanced coordination and implementation - Number of MSAs participating in AdCos - Number and outcome of joint surveillance campaigns supported by/ coordinated by EUPCN and AdCos - Stakeholders' awareness of and satisfaction with EUPCN, SLOs and AdCos. - Stakeholder perceptions of effectiveness and consistency in enforcement due to EU-level mechanisms	- Survey data	
		- Extent to which regulation has led to enhanced cooperation between competent authorities within Member States?	- Number of national coordination bodies per Member State - Member States with MSA-customs system integration - Stakeholder feedback regarding the existence of internal coordination mechanisms (joint task forces, inter-agency committees etc) - Stakeholder feedback regarding impact of regulation on coordination within Member States -	- National MSA strategy documents (e.g. Summary of national surveillance strategies) - Safety Gate (e.g., Annual report) - Stakeholder interviews - Survey data - Public consultation[17]	- Analysis of consultation outputs - Desk research/literature review - Inputs from case studies (Fragmentation and governance; Toys and consumer electronics imports) - Comparison between the intended objectives of the regulation and

No	Sub-question	Judgement criteria	Indicators	Sources	Methods
					how it evolved
Q3.5	- What external factors and unintended effects (if any) have affected progress towards the objectives and how are they linked to the MSR?	- Extent to which external factors have influenced the achievement of MSR objectives - Legal developments (GPSR, DSA) - Market evolution: Influence of e-commerce and their practices on product compliance. - Consumer awareness - Sectoral product legislation	- Broad legislative framework incl. DSA, GPSR and sectoral legislation - Trends in e-commerce sales and analysis of new business models - Trade diversion following imposition of tariffs by EU trading partners. Consumer awareness on challenges linked to e-commerce	- ICSMS (e.g., ICSMS documents) - Eurostat (E-commerce statistics for individuals) - Customs reports - ICSMS (e.g., ICSMS documents) - Public consultation[19,20] - Stakeholder interviews - Survey data	- Analysis of consultation outputs - Desk research/literature review - Trend analysis of quantitative indicators - Comparison between intended objectives of the regulation and how it evolved - Case study inputs (Online marketplaces and the enforcement of the MSR in the online environment)
Q4. Efficiency: Were the benefits achieved at a reasonable cost?					
Q4.1	What are the costs and benefits for different stakeholders and for society as whole?	- Evolution of the costs and burdens since the application of the Regulation per stakeholder group, and their adequacy for market surveillance activities	- Total annual market surveillance budget in the Member States - Compliance costs (adjustment, administrative, enforcement, reporting obligations, etc.) for MSAs - Compliance costs (adjustment, administrative, enforcement, reporting obligations, etc.) for businesses, with a focus on SMEs,	- Arcot et al. (JRC, 2025), Resources allocated for market surveillance activities in the EU27. - JRC (2025) The EU market surveillance indicators: MSA activities, collaboration and results - Interim evaluation of the Single Market Program (SWD(2025)172 final (for	- Categorisation of the costs in line with the BRT, Tool #56 - Comparison of the costs before the Regulation - Desk research and analysis of consultation and case study input

No	Sub-question	Judgement criteria	Indicators	Sources	Methods
			- Commission costs in support of market surveillance activities	Commission costs - Single Market Programmes Survey and interviews - National MSA reports (statistics on costs and/or HR and/or timelines) - Public consultation[22] - Case studies	
		- Benefits of the MSR, including simplification achieved - Evolution of consumer and societal detriment linked to unsafe and non-compliant products	Efficiency gains: - Pooling of expertise at EU-level by MSAs (efficiency gains from joint actions, best practices, guidance) - Perception of the benefit stemming from an EU-wide coordination of market surveillance activities - Impact of EUTFs on enforcement - ICSMS-related efficiency gains - Improved recovery of costs Broader societal benefits: - Contribution to consumers' health and safety - Contribution to the level playing field -	- Input from the preceding Effectiveness and Efficiency questions - Survey – questions on benefits - Interviews – benefits - Case studies (quantification of benefits, to the extent possible) - Public consultation[23]	- Categorisation and analysis of the benefits in line with the BRT, Tool #56 - For the assessment of the consumer/societal detriment, we will attempt to follow an approach similar to that applied by the GPSR IA (Annex 4).
Q4.2	Are the costs proportionate to the	- Proportionality/affordability of the compliance (incl. administrative)	- Ratios between costs and benefits - Stakeholder perception on	- Surveys and interviews – opinion on	Comparison between costs and

No	Sub-question	Judgement criteria	Indicators	Sources	Methods
	benefits?	costs per stakeholder group	proportionality/affordability	proportionality/affordability - Public consultation[24] - Case studies (CS3 and CS4)	benefits (qualitatively and quantitatively, to the extent possible)
Q4.3	What potential for simplification should be explored?	- Potential areas for simplification	- Digitalisation (interoperability of IT tools, use of AI) - Enhanced cross-border cooperation - Increased traceability of EOs	- Surveys and interviews – opinion on administrative burden and simplification - Public consultation[25] - Case studies (CS3 and CS4)	- Analysis of simplification and potential burden reduction, incl. filling in 'Annex IV. Overview of benefits and costs and, where relevant, table on simplification and burden reduction – Table 2' of the BRT
Q5 Relevance: Is the intervention still relevant					
Q5.1	Do the objectives and provisions of the MSR still match current needs of stakeholders and the internal market?	- Relevance of the general and specific objectives of the MSR - Analysis whether the MSR remit and scope address new needs identified	- Evolution of stakeholder and single market needs since implementation - Gap analysis - documented cases where MSR scope or provisions are insufficient to address current challenges - Stakeholder assessment of the extent to which MSR objectives align with current market surveillance needs	- Stakeholder surveys/interviews. - Public consultation[26] - Case studies. - Desk research /literature review. - Consumer organisation feedback. (e.g., reports from European Consumer Centres Network)	- Desk research - Stakeholder consultation - Comparative analysis (between MSR objectives and scope, and national and stakeholder need) - Gap analysis - Thematic analysis of gaps and emerging needs -

No	Sub-question	Judgement criteria	Indicators	Sources	Methods
Q5.2	Is the MSR sufficiently adaptable to new challenges and developments?	- Extent to which the MSR includes mechanisms to adapt to technological, scientific, and social developments (e.g. e-commerce, digital technologies, complex supply chains, imports from outside the EU).	- Number and nature of updates or amendments to the MSR in response to new challenges. - Stakeholder perceptions of adaptability and responsiveness (survey/interview results).	- Stakeholder public consultation/call for evidence /survey//interviews. - Commission reports (e.g. Evaluation study on the implementation of Article 4 of Regulation (EU) 2019/1020 on market surveillance and compliance of products, Impact Assessment Report on establishing the Union Customs Code and the EU Customs Authority, forthcoming evaluation report on the interaction of the DSA with other legal acts) - Case studies	- Data analysis - Case study analysis. - Descriptive analysis of stakeholder perceptions of adaptability and responsiveness (survey/interview results).
Q6. Coherence: Are there issues of clarity in some provisions of the Regulation and in their application and issues of coherence within the Regulation or with other initiatives and policies having similar objectives?					
Q6.1	To what extent is the MSR **internally coherent**?	- Extent to which provisions (incl. definitions) of the MSR are consistent, mutually reinforcing. - Extent to which provisions of the MSR are free from gaps or contradictions	- Assessment of consistency in product scope coverage between Annex I and Article 4.5 - Assessment of clarity and adequacy of EOs' list and responsibilities under Article 4, especially for e-commerce imports - Stakeholder perceptions of internal coherence, clarity, and adequacy	- The Market Surveillance Regulation - Stakeholder public consultation/call for evidence /survey//interviews. - Case studies	- Analysis of the stakeholder perception - Analysis of the number and nature of overlaps, gaps, or inconsistencies identified between MSR provisions - Case study analysis
Q6.2	To what extent is the MSR **externally**	- Extent to which MSR market surveillance provisions are	- Assessment of overlaps or gaps with other EU frameworks	- The Market Surveillance Regulation and other EU acts	- Analysis of stakeholder

No	Sub-question	Judgement criteria	Indicators	Sources	Methods
	coherent?	appropriately distinguished from GPSR provisions for harmonised products - Extent to which the Regulation is coherent with other pieces of EU legislation	- Frequency of consistent or divergent enforcement actions across frameworks (e.g., MSR and GPSR) - Frequency of regulatory gaps, overlaps, or duplicative requirements identified in enforcement reports - Stakeholder feedback on clarity, consistency, and compatibility of requirements across frameworks - Case studies highlighting challenges or successes in cross-framework application	- Stakeholder surveys/interviews - Public consultation - Case studies	perceptions of external coherence, clarity, and adequacy - Comparative analysis of the MSR and its measures with other EU acts - Case studies analysis
Q7. EU added value: what is the additional EU value added?					
Q7.1	What is the additional value resulting from the MSR, compared to what could be achieved at national level alone?	- MSR results (conducive to its objectives) compared to what can be done at national level.	- Evidence of a positive impact on health and safety of consumers (**reference to Efficiency assessment)** - Evidence of burden reduction from reduced market fragmentation and egal certainty for businesses (**reference to Efficiency assessment)** - Share of cross-border non-compliance cases resolved through EU mechanisms (**reference to data from Effectiveness section**) - Evidence of cost savings or efficiency gains from EU-level coordination (**reference to Efficiency section**)	- ICSMS - Safety Gate (e.g., Annual report) - Commission reports (e.g. Evaluation study on the implementation of Article 4 of Regulation (EU) 2019/1020 on market surveillance and compliance of products, Impact Assessment Report on establishing the Union Customs Code and the EU Customs Authority, forthcoming evaluation report on the interaction of the DSA with other legal acts) - Case studies	- Evidence of cost savings or efficiency gains from EU-level coordination - Analysis of stakeholder perceptions of EU added value - Analysis of consumer data and safety data - Case study analysis

No	Sub-question	Judgement criteria	Indicators	Sources	Methods
			Stakeholder perceptions of EU added value **(reference to survey/interview results from other sections**)		
Q7.2	To what extent do the issues addressed by the Regulation continue to require action at EU and what would be the most likely consequences of stopping or withdrawing the MSR?	- EU-level coordination and harmonisation add value compared to national approaches. - .	- Assessment of whether cross-border risks and market failures persist that cannot be addressed by Member States alone	- Public consultation[30] - Stakeholder interviews/survey	- Analysis of stakeholder perception

ANNEX IV. OVERVIEW OF BENEFITS AND COSTS AND TABLE ON SIMPLIFICATION AND BURDEN REDUCTION

Table 1. Overview of costs and benefits identified in the evaluation[148]									
		Citizens/Consumers		Businesses		National administrations		EU level	
		Quantitative	Comment	Quantitative	Comment	Quantitative	Comment	Quantitative	Comment
Costs									
Direct compliance costs									
Average MSR compliance costs for EOs (direct compliance cost)	**Recurrent**			0 to 0.03% of turnover	They are assessed by EOs as relatively low (around 1% of total compliance costs)				
Third country EOs- average service fee for ARs (direct compliance cost)	**Recurrent**			AR fees are typically in the range of EUR 2,500-8,000 per EO. However, they vary a lot: from EUR 200–500 (basic offer) to EUR 3,000–19,000 (large	Authorised representative fees are typically passed onto non-EU manufacturers.				

[148] Where there is a prior impact assessment, the table should contain as a minimum the costs/benefits identified in the IA with the information gathered on the actual cost/benefit. As available, the table should include the monetisation (€) of the costs/benefits based on any quantitative translation of the data (time taken, person days, number of records/equipment/staff etc. affected or involved represented in monetary value – see Standard cost model, for example). For all information presented, it should be included in the comments section whether it relates to all Member States or is drawn from a subset. An indication of the robustness of the data should be provided in Annex II on Methodology and analytical models used.

				portfolios or high-risk sectors) annually.					
Average cost for EOs per market surveillance check (direct compliance cost)	**One-off**			EUR 500 to EUR 5,000 per check	No average due to data limitation				
Enforcement costs									
Member States' budget for market surveillance (enforcement cost)	**Recurrent**					EUR 150 million in 2022, excluding staff costs + 10 000 FTEs (EUR 648,000,000 for an EU average wage of 40.5/h)	Uncertain estimates due to data limitations.		
Average cost for MSA per market surveillance check (enforcement cost included in the Member States' budget for market surveillance)	**One-off**					Average duration of about 3 hours for simple checks (or EUR 120) and 8.44 hours for an in-depth compliance check (or EUR 340)	Included in the total budget.		

Cost of encoding cases in ICSMS (administrative cost included in the Member States' budget for market surveillance)						EUR 13 per investigation in a national tool (20 min at EUR 40.5/hour) EUR 20 per investigation in ICSMS (30 min at EUR 40.5/hour) Estimated duplication reporting obligations: EUR 8 million. Total ICSMS encoding: EUR 867 thousand (2025, 42,794 investigations)			
EU level budget (enforcement cost)	**Recurrent**							In 2026, the maximum Union contribution for Market Surveillance actions amounts to around EUR 17.3 million.	

Benefits									
Indirect benefits									
Health and safety of consumers		Positive, although limited improvement of compliance and safety of products reaching consumers.	The results of the targeted survey and the public consultation show that most stakeholders acknowledge the MSR's contribution to improved product compliance and safety: 44% (N=121) and 37% (N=57), respectively, on the positive scale.						
Level playing field		Marginal improvement of the level playing field.	42% of respondents in the targeted survey (N=274) and 30% of respondents in the public consultation (N=154) consider that MSR contributed marginally to the level playing						

			field.						
Direct benefits									
ICSMS efficiency gain						The estimated savings from reusing information from the ICSMS are estimated at between EUR 150,000 and EUR 1 million per year			
Rate of recovery of costs for market surveillance actions						According to estimates based on MSA information, the rate of recovery has quadrupled, from 2.4% in 2019 to 10% in 2021.			
Better pooling of expertise						Not quantifiable	63% of MSAs and customs authorities consider that the MSR has resulted in better pooling of expertise		

							due to enhanced cooperation of market surveillance authorities at EU level through coordination mechanisms such as AdCos and the EUPCN (N=167).		
Improved cooperation within Member States						Not quantifiable	Majority of respondents of the targeted survey of MSAs (122 out of 233) consider that the Regulation has enhanced cooperation between competent authorities within my Member State (incl. customs).		

TABLE 2: Simplification and burden reduction (savings already achieved) *Report any simplification, burden reduction and cost savings **achieved already** by the intervention evaluated, including the points of comparison/ where available (e.g. REFIT savings predicted in the IA or other sources).*								
	Citizens/Consumers/Workers		Businesses		Administrations		[Other…] _ specify	
	Quantitative	Comment	Quantitative	Comment	Quantitative	Comment	Quantitative	Comment
Direct enforcement cost savings								
Recurrent – ICSMS efficiency gains					The estimated savings from reusing information from the ICSMS are estimated at between EUR 150,000 and EUR 1 million per year.			
Recurrent – Recovery rate of market surveillance costs					According to estimates based on MSA information, the rate of recovery has quadrupled, from 2.4% in 2019 to 10% in 2021.			

PART II: II <u>Potential</u> simplification and burden reduction (savings) *Identify further potential simplification and savings **that could be achieved** with a view to make the initiative more effective and efficient without prejudice to its policy objectives[149].*								
	Citizens/Consumers/Workers		Businesses		Administrations		[Other…] _ specify	
	Quantitative	Comment	Quantitative	Comment	Quantitative	Comment	Quantitative	Comment
Recurrent – Interoperability of IT tools					Not quantified	Authorities estimate that double-entry between ICSMS and national systems can consume up to 20% of the total time allocated to an enforcement case Consolidating ICSMS and other EU IT tools would remove		

[149] This assessment is without prejudice to a possible future Impact Assessment.

						duplication.		
Recurrent - EU-wide AI tools and web-crawlers for online enforcement					Not quantified	Stakeholders across all groups support AI-powered tools to automate the tracing of non-compliant products, perform image searches and detect systemic risk patterns.		
Recurrent - Cooperation between Member States					Not quantified	There are potential efficiency gains for the Member States from more intense cross-border cooperation e.g. due to larger reliance on investigations performed in other Member States rather than separately in all Member States.		
Recurrent – improved traceability of EOs					Not quantified	Efficiency gains can be found from		

						better traceability of EOs, especially online. MSAs perceive that the current enforcement model as resource-intensive as authorities must pursue numerous sellers, often located outside the EU. MSAs flag that investigations last much longer when responsible economic operator cannot be easily identified and contacted. This in turn generates additional unnecessary costs.		

ANNEX V. STAKEHOLDERS CONSULTATION (SYNOPSIS REPORT)

Consultation strategy

The stakeholder consultation strategy was devised for both the evaluation and the impact assessment supporting the revision of the MSR, and included the following tools:

- Call for Evidence (C4E)
- Public Consultation
- Target surveys
- Targeted interviews, including case study interviews
- Validation workshop

Consultations in the scope of this study were implemented between November 2025 and May 2026.

Call for Evidence

The Call for Evidence was published on the *'Have your say'* portal[163] on 12 November 2025 and remained open until 4 February 2026. The Call for Evidence gathered 97 contributions. As shown in the table below, companies and business associations jointly accounted for 62% of the contributions. Another 12% of the contributions were submitted by individual citizens. NGOs and consumer organisations submitted another 12 contributions, and eight public authorities participated in the Call for Evidence.

Table A5.1– Contributions to the Call for Evidence by stakeholder category

Stakeholder category	Contributions	Share of responses
Business association	49	50%
Company/ business	12	12%
Consumer organisation	3	3%
Non-governmental organisation	9	9%
EU Citizen	11	11%
Non-EU citizen	1	1%
Public authority	8	8%
Other	4	4%
Total	**97**	

The two points raised most often across contributions were the role of online marketplaces and, linked to this, an observed e-commerce enforcement gaps (49%, 47 out of 97 responses). Some respondents suggested that the MSR should be revised to make online marketplaces more accountable, for example, by including them explicitly as economic operators in the scope of the MSR, and to enhance their obligations at the point of sale. Controls of imports at the border were mentioned as another important topic by

% of respondents (46 out of 97 responses). Respondents favoured a strong push to strengthen checks on incoming products and identified a need for addressing low-value B2C imports in particular.

A similar share of respondents expressed a need to increase the resources and expertise of market surveillance authorities (46%, 44 out of 97 responses), calling for more staff, funding, technical

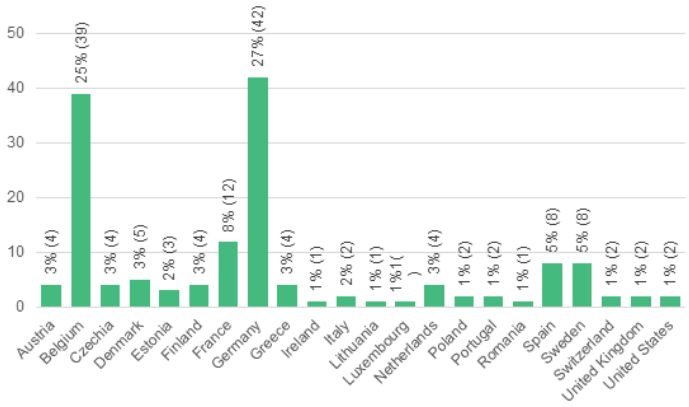
capacity, and testing capabilities for MSAs. Other topics mentioned in the Call for Evidence were digital tools and the interoperability across EU tools, oftentimes accompanied by an overall request for improvements in data-sharing systems, also in light of other ongoing policy initiatives (e.g. through the DPP).

Lastly, 31% (30 out of 97 responses) of the stakeholders highlighted a need for stronger EU-level coordination, pooling expertise and in some cases expressed support for a central EU authority in the field of Market Surveillance.

Public Consultation

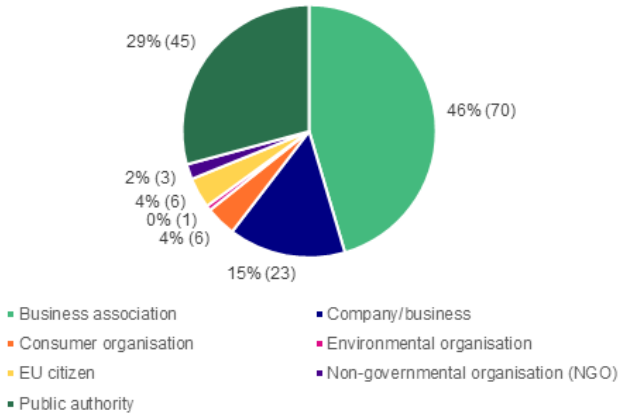
The public consultation was open for contributions on the '*Have your say'* portal between 12 November 2025 and 4 February 2026. The public consultation gathered 154 contributions from 22 countries (19 EU Member States). The majority of the feedback came from Germany (27%, 42 out of 154 responses) and Belgium (25%, 39 out of 154 responses), followed by France (8%, 12 out of 154 responses), Sweden and Spain (each with 5%, 8 out of 154 responses each). Between 1 and 5 contributions were submitted by respondents from the other countries each (see figure below).

Figure A5.1 – Number of responses to the public consultation by country



Almost half of the respondents represented business associations (46%, 70 out of 154 replies), followed by public authorities (29%, 45 out of 154 replies) and companies (15%, 23 out of 154 replies). EU citizens, consumer organisations, environmental organisations, NGOs and other accounted for the remaining 11% (17 out of 154 replies). Among responding companies (23 out of 154 replies), 83% (19 out of 23 companies) were large enterprises, while 17% (4 out of 23 companies) were SMEs or micro companies.

Figure A5.2 – Number of responses to the public consultation by stakeholder category



Many respondents expressed the view that there is room to improve the current implementation of the MSR. 62% (95 out of 154 replies) expressed the view that market surveillance authorities do not yet carry out product checks at an adequate scale, and almost 70% (107 out of 154 replies) expressed the view that checks are not carried out at a comparable scale across Member States. Similarly, the respondents were critical regarding customs controls at EU borders: 66% (101 out of 154 replies) disagreed that controls are adequate to prevent non-compliant products entering the EU through e-commerce, and 61% (94 out of 154 replies) disagreed that border controls are comparable across Member States. More than half of the respondents (51%, 79 out of 154 replies) do not consider the cooperation between market surveillance authorities and customs authorities as effective.

Resource constraints were identified as a persistent challenge. Half of the respondents (52%, 80 out of 154 replies) disagreed that Member States allocate sufficient resources for the implementation of the Regulation, while 60% (93 out of 154 replies) noted considerable differences in the resource allocation across Member States. Large shares of respondents were unable to express a view on the effectiveness of EU-level resource pooling and EUTFs, though relative majorities still disagreed that these mechanisms adequately alleviate national capacity constraints.

More than half of the respondents, 55% (85 out of 154 replies), consider the Regulation as not effective at all or ineffective in ensuring that only compliant products reach the Single Market, while only 10% (15 out of 154 replies) considered it effective or very effective. Key reasons cited include high volumes of imports from third countries, complex global supply chains, reliance on self-declaration of conformity, limited resources and technical capacity of authorities, difficulties in monitoring online marketplaces, and insufficient harmonisation and coordination across Member States.

E-commerce emerged as a central concern among the respondents to the public consultation. 58% of respondents agreed that products sold online are more likely to be non-compliant or dangerous than those sold in-store, and 85% indicated that, in their view, market surveillance authorities are not sufficiently equipped to meet the challenges posed by the growth of e-commerce.

Respondents expressed strong support for both non-legislative and legislative measures to revise the current MSR. 66% (102 out of 154 replies) supported additional guidance and training for authorities on tracing non-compliant or dangerous products sold online, and 76% (113 out of 148 replies) supported greater use of digital and AI-based tools. There was broad agreement that all products placed on the EU market should have a responsible economic operator established in the EU, and strong backing for closer cooperation between market surveillance authorities and customs, enhanced EU-level digital tools, and strengthened EU-level governance, including a possible EU Market Surveillance Authority to coordinate cross-border enforcement.

Data request to MSAs

A dedicated data request was shared with MSAs across the EEA to gather data on the resources available for market surveillance across countries, statistics on the activities implemented by market surveillance authorities on an annual basis, and the frequency of cross-border cooperation. 81 responses were collected from MSAs and SLOs from 17 countries across the EEA. A large share of responses came from Cyprus (20%, 16 out of 81 responses) and Germany (19%, 15 out of 81 responses).

Market Surveillance Authorities across Member States reported a strong reliance on external laboratory capacity to support enforcement activities. Comprehensive in-house laboratory facilities were reported only in a limited number of cases and typically restricted to specific sectors. As reported by authorities, this increases dependence on available funding and can limit the volume and frequency of testing activities.

The number of formal checks has increased more strongly than in-depth investigations during the period from 2019 to 2025, with little change to laboratory testing rates.

Inspections were most followed by corrective actions or voluntary measures taken by economic operators, while the application of penalties was reported as relatively infrequent. Cost recovery mechanisms were also reported as rarely applied and generally limited to specific legal contexts.

Authorities reported that proactive checks account for most recorded controls. Reactive inspections triggered by customs notifications, Safety Gate alerts or requests from authorities in other Member States were consistently reported as a smaller share of total activity. At the same time, several authorities indicated that reactive and informal cooperation actions are not fully captured in quantitative reporting systems, suggesting that reported figures may not reflect the full extent of such activities.

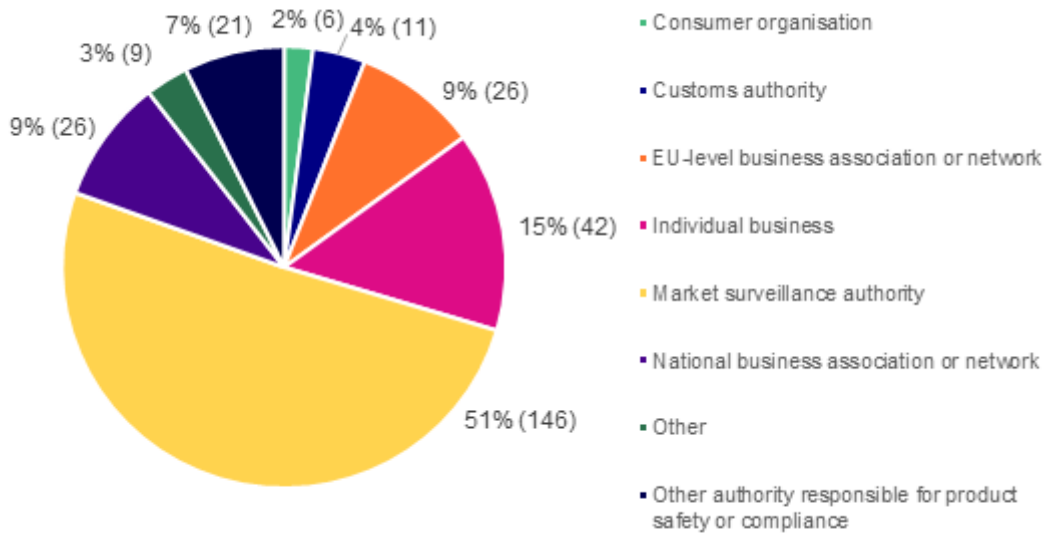
MSAs consistently emphasised the importance of EU-level coordination mechanisms. Tools such as Safety Gate, ICSMS and participation in EU joint actions were described as central to the functioning of national market surveillance systems, particularly for authorities with limited resources or fragmented institutional structures. Authorities reported that these mechanisms play a key role in supporting coordination, information exchange and effective enforcement across the Single Market.

Targeted survey

The targeted survey was launched on 2 March 2026 and provided stakeholders the opportunity to provide more detailed information on the implementation, effectiveness, efficiency, coherence, relevance and EU added value of the current MSR, while also exploring the impacts of the refined policy options for the potential revision of the MSR in greater detail. The targeted survey remained open until 10 April 2026.

The survey gathered 287 valid responses. 15% of the replies (42 out of 287 responses) were submitted by individual companies, and 18% (52 out of 287 replies) were submitted by business organisations, of which half were submitted by national and EU-level organisations, respectively. About 4% of the replies (11 out of 287 responses) were submitted by customs authorities. The majority of 51% of the contributions (146 out of 287 responses) were submitted by MSAs, while other authorities accounted for up 21 of the responses. The stakeholder category other made up 7% (15 out of 287 responses). A complete breakdown of the share of responses by stakeholder group is presented in the figure below.

Figure A5.3 – Responses to the targeted survey by stakeholder category



In their replies, 73% (203 of 280 replies) of respondents suggested that there are differences in the implementation of the MSR, while 83% (229 of 276 replies) agreed or strongly agreed that there are differences in the capacities and resources for market surveillance across Member States. About 73% (201 of 276 replies) identified differences in the level of practical cross-border cooperation across the EU.

About 64% of the respondents (176 of 274 replies) noted that the implementation of the MSR created clear obligations for economic operators. The same share of stakeholders saw a (strong) improvement in the strengthening of the powers of market surveillance authorities in the same time period. Among the respondents, 43% (117 out of 274 responses) identified a contribution of the MSR to the objective of strengthening the controls on products entering the single market from third countries, while the same number of stakeholders identified no improvement or even a deterioration. Only 28% of the stakeholders (78 out of 276 replies) identified an improvement in the operational enforcement capacity and resources available to market surveillance authorities, with 54% (156 replies) reporting no change or a deterioration compared to a few years back.

A majority of 55% (151 out of 275 responses) replied that they see potential for further simplification, whereas only 7% (19 out of 275) replied that there is no further room for simplification under the MSR. Respondents especially noted potential for simplification through avoiding double reporting and the manual entry of information by integrating IT systems (ICSMS, Safety Gate, DPP). Other areas for simplifications identified by stakeholders were the reduction of burdens by harmonising definitions, obligations and procedures across legislation, notably between the MSR on the one side and the GPSR, DSA, and sectoral legislation on the other side to ensure consistent enforcement.

A very large majority of respondents, between 76% (210 out of 276 replies) and 89% (247 out of 277 replies), responded that the objectives of the MSR remain relevant in light of the current and evolving needs.

The results of the targeted survey indicate mixed views among stakeholders on the coherence of the MSR with other EU legislation, such as the GPSR, NLF, DSA, UCC, and others. The MSR is considered least coherent with the DSA, ESPR, REACH, UCC, and the CLP, as between 27% (72 out of 266 replies for the CLP) and 46% (125 out of 273 replies for the GPSR) of respondents suggested in their contributions. At the same time, considerable shares of respondents, between

22% (59 out of 273 replies) and 60% (106 out of 177 replies), considered themselves not in a position to provide any judgement.

Almost 9 out of 10 respondents (241 out of 274) strongly agree that the objectives supported by the Regulation continue to require action at the EU level, while less than 2% (5 out of 274) disagreed.

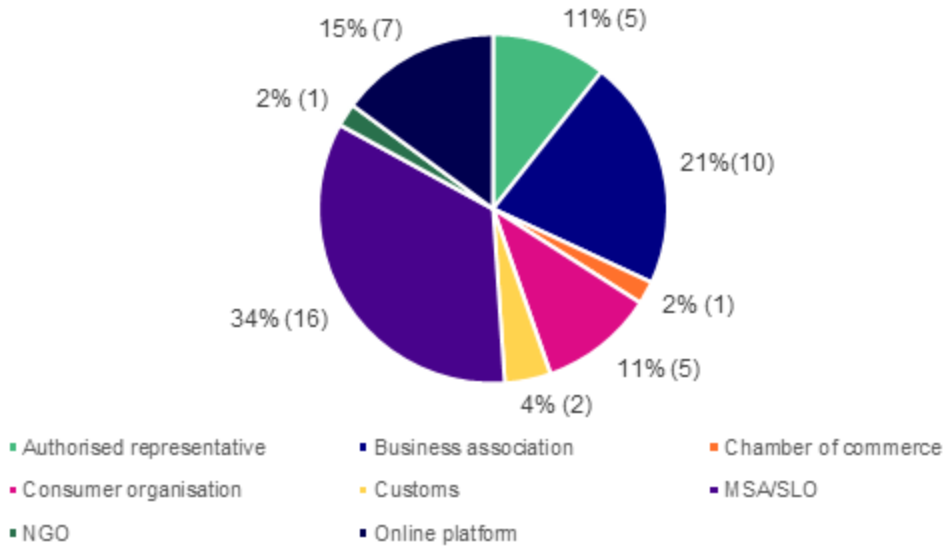
Overall, stakeholders expressed strong support for additional policy action at the EU level to strengthen the legislative framework on market surveillance further. About half of the respondents (134 out of 274) expressed support for the most stringent policy option with regard to the objective to close current regulatory loopholes. While consumer organisations and EU-level business associations show very strong support (beyond two-thirds of respondents from these groups), the support is less pronounced among businesses and their associations. Also, about half of the respondents (134 out of 274) supported the third option in relation to the objective to strengthen capacity, expressing support for an enhanced ICSMS system, more EUTFs, and additional powers for customs authorities and for the EU-level in the form of both an auditing system as well as in the form of investigative and enforcement powers. A plurality of stakeholders (38%, 105 out of 274 replies) further expressed support for the set-up of permanent clusters of seconded national inspectors to enhance coordination across borders.

Targeted interviews

A total of 47 interviews were carried out as part of the consultations. The interviewees were conducted with stakeholders from across eight categories: business associations, SLOs, online marketplaces, authorised representatives, chambers of commerce, consumer organisations, NGOs, and customs authorities.

SLOs accounted for the majority of interviews with 34% (16 out of 47 interviews), followed by business associations 21% (10 out of 47) and online marketplaces 15% (7 out of 47). The overall divide of interviews across stakeholder categories is shown in the figure below.

Figure A5.4 – Stakeholder groups interviewed in the scope of the consultations



Under Objective 1 on the closing of regulatory loopholes, SLOs and MSAs widely considered the current Article 4 of the MSR to be ineffective for online sales because of authorised representatives not existing, not being contactable, or not holding the listed mandate. Most authorities, therefore, supported the extension of Art. 4 and the implementation of a mandatory verification mechanism (through an AR database or the DPP) to ensure a real and accountable EU-based operator. Business

associations broadly agreed that the loopholes in Article 4 mainly affect e-commers and sellers from third countries. They expressed support for an extension of the scope of Article 4 and the introduction of a verification mechanism for authorised representatives, conditional on ensuring that no additional burden is created for already compliant firms and SMEs. Consumer organisations viewed Article 4 critically and expressed that the current regulation is not sufficient to guarantee accountability. The interviewed consumer organisations expressed strong support for the extension of the MSR to all harmonised product legislation and for the introduction of a verification mechanism. Online marketplaces acknowledged that information on authorised representatives is frequently unreliable and favoured a centralised, automated verification system over expanding legal liabilities. Authorised representatives highlighted that the current Article 4 is working conceptually but is limited in its enforceability through untrue mandates, shell companies and unreliable manufacturer information. An extension of the scope of Article 4 was only supported if it were paired with an enforceable verification mechanism and mandate clarity. The respondents cautioned that a shifting of product compliance responsibility to authorised representatives without structural safeguards would destabilise the function instead of improving compliance.

Regarding the extension of responsibilities for online marketplaces, SLOs and MSAs voiced that cooperation with large platforms is generally working well, but ineffective without tools to prevent relisting. The stakeholders expressed support for the introduction of a systematic, ex-ante verification and repeat-offer prevention tools for OMPs. Business associations overarchingly supported increasing the responsibilities of OMPs to restore a level playing field for EU manufacturers. Concerns were voiced should obligations require extensive manual compliance checks without automation. OMPs supported the display and database-based verification requirements, such as the DPP or an AR registry, but opposed the extension of obligations to general monitoring or substantive compliance assessments. Deeming marketplaces as responsible for product compliance was widely seen as incompatible with the existing business models.

Under Objective 2 on boosting market surveillance capacity, MSAs and SLOs voiced strong support for integrating ICSMS, DPP, customs systems, and automation flows to reduce the workload and enable risk-based enforcement at scale. An introduction of such tools was deemed to be associated with a reduction in time spent on verification procedures. Business associations overall recognised existing capacity constraints and supported the introduction of additional IT tools and coordination, provided controls become more effective in practice. Increased obligations were considered acceptable only if they were matched with stronger enforcement against non-compliant operators. Consumer organisations supported the introduction of digital tools such as the DPP and web crawlers, only if these led to concrete enforcement outcomes. OMPs responded that they already invest heavily in compliance and detection tools, but stressed limitations caused by the fragmentation of databases and inconsistencies in data quality. The introduction of a centralised, interoperable EU system was seen as essential to reduce manual checks and to speed up enforcement actions.

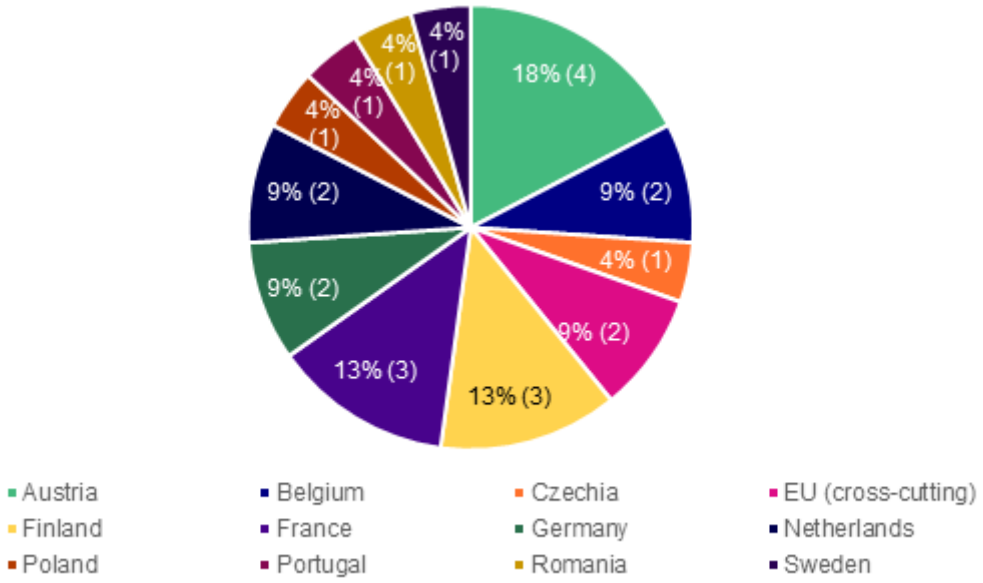
Under objective 3 on strengthening cooperation between authorities, MSAs and SLOs largely supported stronger EU-level coordination mechanisms for large cross-border and e-commerce cases, but stressed the need to safeguard national autonomy. Business associations voiced issues with inconsistent enforcement across Member States, creating competitive distortions and legal uncertainty. A CPC-style coordination mechanism or an increase in structured joint actions was generally preferred over an EU-level centralisation of market surveillance. Online marketplaces supported the harmonisation of market surveillance enforcement across the EU, as long as roles remain clearly separated.

Case studies

Four case studies were implemented in the scope of the consultations, combining desk research with interviews. These interviews took the form of designated case study interviews with dedicated questionnaires.

In total, 23 stakeholders were interviewed in the scope of four case studies. The stakeholders interviewed for the case studies were spread across 11 EU Member States (see Figure 6).

Figure A5.5 – Case study interview division by country



Case study 1 focused on market surveillance at the border for imports from third countries - Customs and MSAs collaboration. Six stakeholders from four countries were consulted for interviews (two SLOs, MSAs, and customs authorities each). The interviewees suggested that operational constraints in cooperation resulted from a misalignment between the legal deadline and the real timeline for inspections, the absence of integrated IT tools between customs and MSAs, and uncertainties on the competencies of MSAs in relation to B2C parcels.

Case study 2 covered the topic of enforcement for products sold on online marketplaces. Three stakeholders from three countries and three EU-level organisations were consulted for interviews(two online marketplaces (OMP) and MSAs each, one SLO and one business association). A significant barrier to enforcement identified by the stakeholders in the interviews is the challenge to identify and contact the responsible economic operator, including the authorised representative, under Article 4 and limited product information in recall requests by MSAs to OMPs, which slows the recall process down.

Case study 3 investigated potential fragmentation and governance divergence between Member States. Five stakeholders from three countries were interviewed (Three SLOs, one MSA, and one consumer organisation). Stakeholders identified inefficiencies in the current system, which they consider to be driven by unclear procedures and limitations of the current ICSMS system.

Case study 4 focused on the administrative burden and simplification potential of the MSR, focussing on the digital infrastructure and interoperability. Five stakeholders from five EU countries were interviewed (four SLOs and one MSA). The case study interviews flagged a lacking interconnectedness of national systems with ICSMS as a key issue and noted a misalignment between the investigations reported in ICSMS and the true volume of cases pursued by MSAs.

They noted that these challenges are augmented by a growing e-commerce sector. Simplification priorities identified by stakeholders were the creation of a national to ICSMS IT interface for automated data transfers, and creating interoperability between ICSMS and other EU-level tools and databases such as Safety Gate and customs.

Validation workshop

The validation workshop took place on 13 May. The main findings and lessons learned for the evaluation were presented and structured around four guiding questions. For the impact assessment, one breakout group with MSAs focused on Objectives 2 and 3, while the other focused on measures for ARs and OMs, discussing and confirming the validity of estimates and assumptions.

Identified campaigns and ad-hoc contributions

No campaigns were identified in the context of the public consultation. Position papers were provided by stakeholders in the scope of the Call for Evidence, public consultation, targeted survey and the targeted interviews, and analysed in the scope of these consultation activities. No ad-hoc documents were received outside the consultation activities.

ANNEX VI. OTHER FIGURES AND TABLES

1. ICSMS AND SAFETY GATE DATA

Table A6.1. Evolution of the MSAs creating notifications on ICSMS by Member State (2019 - 2025)

Member State	2019	2020	2021	2022	2023	2024	2025
Austria	13	10	12	14	15	17	15
Belgium	9	7	9	8	7	6	9
Bulgaria	4	3	2	2	3	5	4
Croatia	4	2	2	4	3	3	1
Cyprus	5	4	4	4	6	7	7
Czechia	2	3	9	18	19	22	24
Denmark	3	3	3	3	4	4	5
Estonia	1	5	5	4	5	4	5
Finland	4	5	4	10	13	13	12
France	7	9	8	10	8	10	12
Germany	117	120	101	120	132	147	144
Greece	3	2	1	5	5	6	6
Hungary	4	5	6	4	25	26	44
Ireland	6	4	8	6	6	6	8
Italy	3	1	3	5	4	8	9
Latvia	3	2	2	2	3	2	3
Lithuania	2	2	3	2	4	3	3
Luxembourg	2	2	2	2	2	3	2
Malta	1	2	2	3	3	3	2
Netherlands	4	4	4	4	4	4	4
Poland	6	3	15	24	25	29	33
Portugal	3	1	2	3	2	3	4
Romania	2	2	2	2	2	2	4
Slovakia	3	2	3	3	2	3	2
Slovenia	3	4	3	5	6	5	5
Spain	19	17	31	29	27	27	28
Sweden	9	9	11	9	10	10	13
Total	**242**	**233**	**257**	**305**	**345**	**378**	**408**

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Figure A6.1. Evolution of the number of MSAs creating notification on ICSMS (2019 - 2025)

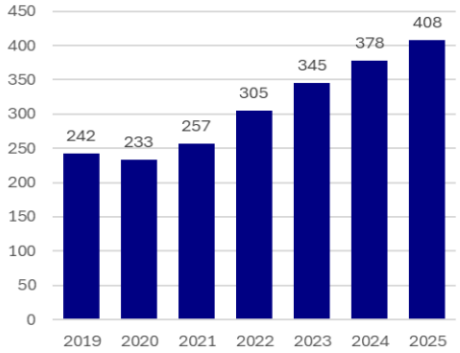


Table A6. 2. Evolution of the number of notifications created on ICSMS by Member State (2019-2025)

Member State	2019	2020	2021	2022	2023	2024	2025
Austria	287	359	250	673	1,025	1,419	1,980
Belgium	152	114	699	778	412	327	739
Bulgaria	408	207	94	374	268	272	258
Croatia	119	211	231	327	303	287	383
Cyprus	180	159	130	164	192	202	304
Czechia	148	160	298	1,849	4,094	6,962	14,007
Denmark	102	271	1,126	1,148	845	674	527
Estonia	7	4	24	67	145	130	317
Finland	291	322	254	303	436	377	407
France	3,836	2,476	3,249	753	150	443	10,435
Germany	4,466	3,866	4,615	5,611	8,168	10,454	11,385
Greece	23	7	12	319	849	435	565
Hungary	236	293	212	211	988	1,099	1,124
Ireland	57	51	420	271	307	547	871
Italy	134	168	119	134	194	250	554
Latvia	48	102	172	310	306	406	559
Lithuania	40	30	153	160	128	1,069	1,585
Luxembourg	213	239	223	334	181	404	458
Malta	100	22	201	128	134	295	361
Netherlands	377	1,091	458	596	692	1,838	3,447
Poland	306	209	298	1,020	1,183	2,263	2,671
Portugal	125	34	80	139	104	234	317
Romania	26	14	10	38	12	22	509
Slovakia	667	423	690	918	743	633	1,259
Slovenia	82	64	107	509	373	324	363

Member State	2019	2020	2021	2022	2023	2024	2025
Spain	344	643	717	1,098	1,796	2,094	1,651
Sweden	282	324	500	2,703	2,702	3,095	2,674
Total	**13,056**	**11,872**	**15,366**	**20,959**	**26,759**	**36,587**	**59,735**

Table A6. 3. Evolution of the number and share of non-compliant products in completed investigations recorded on ICSMS (2019-2025)

Year of creation	Total investigations (completed)	Of which: not compliant	Share of non-compliant (%)
2019	9,059	4,505	49.7
2020	8,226	4,803	58.4
2021	10,708	5,751	53.7
2022	18,785	10,731	57.1
2023	23,956	13,181	55.0
2024	31,439	17,529	55.8
2025	42,794	22,610	52.8
Total	144,967	79,110	54.6

Table A6.4. Non-compliance rate by sector (2021 - 2025)

	2019	2020	2021	2022	2023	2024	2025
Toys	45%	42%	42%	59%	54%	57%	61%
Cosmetics	26%	33%	30%	42%	53%	60%	56%
LVD	64%	62%	72%	88%	54%	46%	40%
Chemicals	81%	76%	49%	43%	57%	69%	79%
General Product Safety	45%	49%	41%	45%	54%	62%	40%
PPE	64%	83%	82%	77%	59%	58%	53%
ROHS	57%	57%	68%	69%	57%	54%	53%
Ecodesign	32%	35%	55%	50%	48%	47%	46%
Machinery	74%	83%	86%	72%	73%	68%	60%
Vehicles	8%	78%	60%	54%	56%	61%	71%

Note: Sectors shown are top 10 according to the number of investigations over the time period 2021-2025.

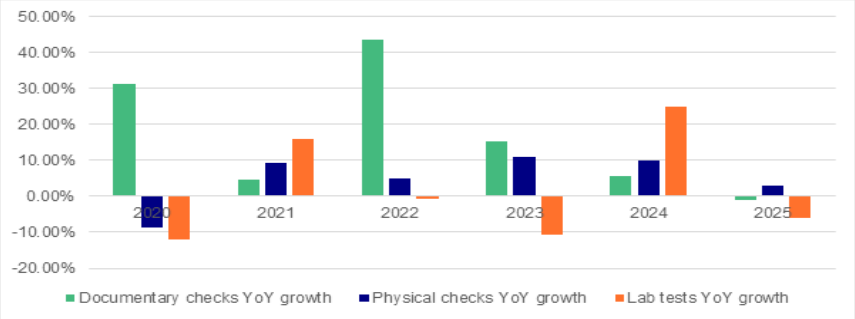
Table A6.5. – Results of ICSMS investigations

Outcome of checks year-on-year growth rates							
Metric	**2020**	**2021**	**2022**	**2023**	**2024**	**2025**	**Average**
Corrective actions	21,91%	7,17%	54,51%	24,89%	16,73%	16,11%	23,55%
Voluntary measures	-29,93%	48,52%	16,15%	148,20%	-4,75%	23,49%	33,61%
Penalties	-24,28%	32,14%	42,68%	-5,41%	9,14%	-9,76%	7,42%
Cost recovery	-13,66%	-6,04%	53,10%	-8,74%	53,60%	-6,91%	11,89%
Composition share (% of total checks)							
Metric	**2020**	**2021**	**2022**	**2023**	**2024**	**2025**	**Average**
Corrective actions	11,26%	10,82%	11,55%	11,41%	11,38%	12,09%	11,42%
Voluntary measures	10,25%	18,11%	12,95%	23,72%	22,36%	21,27%	17,94%
Penalties	3,65%	4,73%	5,62%	4,78%	4,21%	4,21%	4,69%
Cost recovery	1,71%	0,67%	1,59%	0,77%	0,90%	0,50%	1,14%

Table A6.6. – Share of corrective action

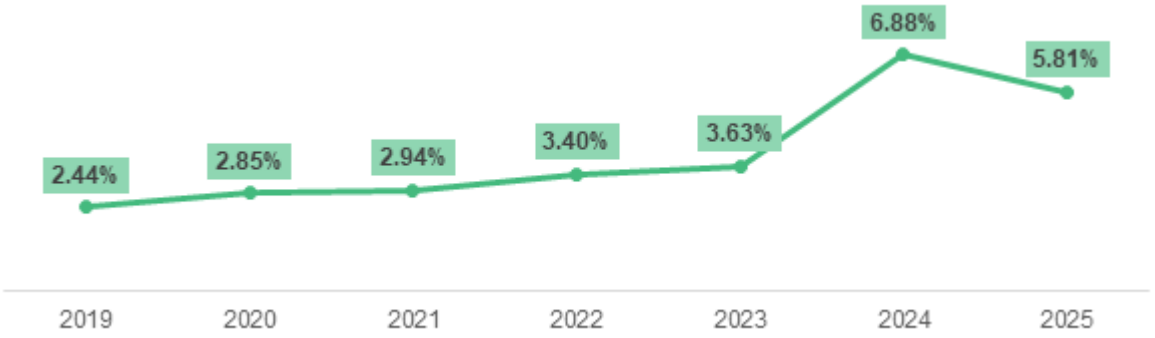
Year	None	Bringing into compliance	Preventing the making available on the market	Withdrawal	Recall	Destruction	Other
2019	2%	2%	9%	7%	2%	1%	2%
2020	3%	1%	6%	6%	3%	0%	2%
2021	4%	1%	8%	5%	5%	0%	1%
2022	3%	2%	14%	5%	2%	1%	2%
2023	2%	2%	12%	5%	4%	1%	1%
2024	4%	3%	10%	4%	3%	1%	2%
2025	3%	2%	11%	5%	2%	3%	1%

Figure A6. 2. Year-on-year growth by type of check performed



Source: MSAs reporting.

Figure A6.3 Average share of checks in which the costs were recovered out of total checks (all countries)



Source: MSAs reporting.

Table 1 A6.7 – Total number of Safety Gate alerts per year by country

Country	Total	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Germany	4542	210	334	338	338	448	422	549	428	453	469	459
Italy	3602	51	25	33	51	90	40	41	51	820	1083	1191
France	2531	120	163	174	241	151	99	207	200	290	315	447
Hungary	2333	213	180	143	162	167	163	162	137	309	365	316
Sweden	1914	86	49	57	62	109	65	152	133	386	385	383
Poland	1424	15	49	117	127	129	147	158	172	147	167	169
Czechia	1379	73	64	28	100	74	54	43	80	101	330	359
Cyprus	943	111	113	121	152	128	82	45	33	52	65	37
Finland	941	48	59	90	115	108	94	64	76	76	90	105
Spain	922	232	209	219	119	3	7	7	11	4	22	67
United Kingdom	903	142	120	114	94	133	280	20	0	0	0	0
Lithuania	845	55	22	41	36	78	56	64	121	113	145	101
Bulgaria	672	122	82	88	76	52	37	63	66	32	39	11
The Netherlands	632	61	58	98	53	40	86	44	37	55	54	34
Slovakia	624	58	36	71	49	64	36	41	43	33	73	104
Ireland	503	5	9	18	27	12	19	49	84	112	69	94
United Kingdom in respect of Northern Ireland	487	0	0	0	0	0	0	0	1	0	2	418
Denmark	473	25	27	27	43	29	73	65	18	38	97	18
Romania	467	20	15	10	8	27	39	49	88	128	81	2
Belgium	465	7	8	18	3	46	113	103	40	27	39	48
Portugal	415	42	53	40	41	46	44	44	23	26	27	24

Austria	330	14	24	15	25	14	30	21	43	31	39	64
Luxembourg	284	9	19	7	17	45	44	26	46	13	19	30
Latvia	270	38	22	22	16	41	28	13	26	20	13	31
Malta	239	22	28	20	19	24	5	11	31	20	23	36
Norway	237	14	16	21	12	21	23	7	43	17	25	17
Estonia	214	22	23	22	18	7	8	16	8	21	23	25
Croatia	214	5	6	24	22	29	18	19	23	11	23	34
Slovenia	172	21	15	11	18	24	12	12	13	11	15	16
Greece	150	14	48	12	23	7	24	2	7	9	4	0
Iceland	73	4	8	3	4	4	12	11	9	11	2	5
Total	**29200**	**1859**	**1884**	**2002**	**2071**	**2150**	**2160**	**2108**	**2091**	**3366**	**4103**	**4645**

Table A6.8 2 – Safety Gate Compulsory Measures

Compulsory measure	2021	2022	2023	2024	2025	Grand Total
Ban on the marketing of the product and any accompanying measures	10%	12%	50%	52%	51%	43%
Withdrawal of the product from the market	48%	52%	29%	24%	18%	28%
Import rejected at the border	11%	12%	8%	6%	14%	10%
Recall of the product from end users	21%	11%	7%	9%	6%	9%
Destruction of the product	1%	4%	2%	2%	8%	4%
Stop of sales	3%	2%	1%	5%	1%	3%
Warning consumers of the risks	3%	5%	1%	1%	0%	1%
Removal of this product listing by the online marketplace	2%	2%	1%	0%	1%	1%
Other	1%	1%	1%	0%	1%	1%

**Results when data on compulsory measures with the following classifications are removed: NA<,none needed, none required.*

Source: MSR Evaluation study based on Safety Gate data.

2. STATISTICS ON COOPERATION MECHANISMS

Table 3 A6.9 – Sectoral coverage of joint actions

	2016	2017	2018	2019	2020	2021	2022	2023	2024	Grand Total
REACH	2	3	2	3	2	2	5	2	3	24
GPSD	8			4	3	1	1			17
LVD	2		1		6		5	2		16
TOYS	1			2	4	3	5			15
RED	1		1	1	5		3	1		12
EMC	1	1	1	2	2	1	1	1		10
ECOD		1		1	1		3	1		7
MI		2		1	2	1	1			7
PPE	1				2	2	1			6
MACHINE	2						3	1		6
GAD	1		1		2	1				5
ENERLAB		1		1			3			5
TPED					3					3
ROSH					1		2			3
GAR			1		1	1				3
CABLES					2					2
BIOCIDE				1		1				2
VEHICLE					1		1			2
PYROTEC							2			2
TYRES	1									1
TOBACCO						1				1
TEXTILE						1				1
CPR							1			1
RCD			1							1
TDGD					1					1
ATEX						1				1
Grand Total	20	8	8	16	38	16	37	8	3	154

Source: MSR evaluation study based on JRC data.

3. ECONOMIC ANALYSIS

Product level analysis

The product categories with the highest overall consumption value, which together make up more than 50% of the value of all harmonised products consumed in the EU, are as follows:

Table A6.104 – Share of value from all harmonised goods consumed in the EU by harmonised product category- EU27, 2024

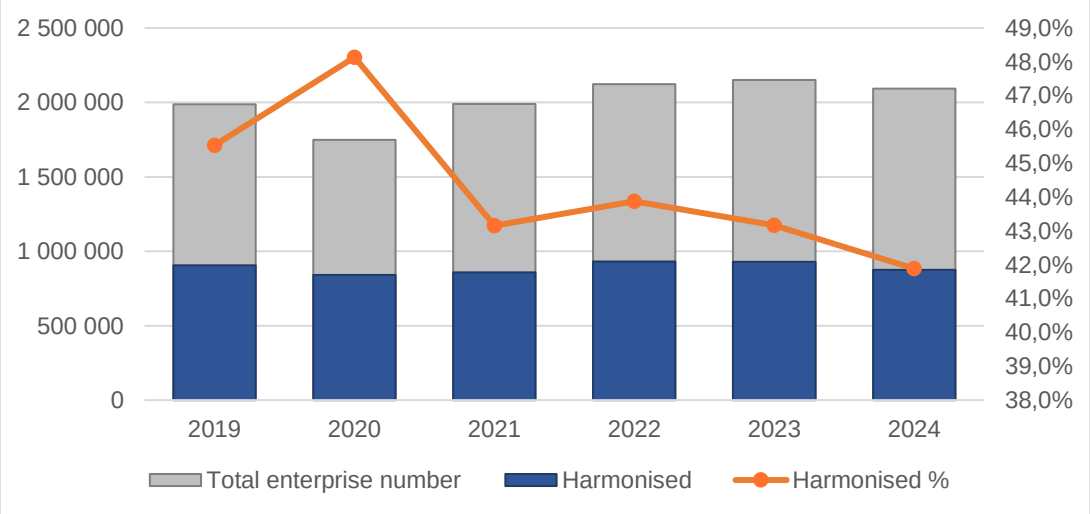
NACE code	Product description	% of value of all harmonised goods consumed in the EU
2910	Manufacture of motor vehicles	11.56%
2932	Manufacture of other parts and accessories for motor vehicles	7.13%
2014	Manufacture of other organic basic chemicals	4.39%
2511	Manufacture of metal structures and parts of structures	2.99%
2630	Manufacture of communication equipment	2.66%
2620	Manufacture of computers and peripheral equipment	2.56%
2562	Manufacture of locks and hinges	2.43%
2611	Manufacture of electronic components	2.41%
2221	Manufacture of plastic plates, sheets, tubes and profiles	2.18%
2651	Manufacture of instruments and appliances for measuring, testing and navigation	2.13%
2790	Manufacture of other electrical equipment	2.10%
2059	Manufacture of other chemical products	1.96%
2720	Manufacture of batteries and accumulators	1.74%
2899	Manufacture of other special-purpose machinery	1.67%
3250	Manufacture of medical and dental instruments and supplies	1.66%
2599	Manufacture of other fabricated metal products	1.58%

Across the top six product groups with the highest share of trade value of harmonised goods, EU extra-EU import values show a clear split between (i) high-value, innovation-intensive goods dominated by a small number of advanced partners (notably Switzerland and the United States) and (ii) electronics/ICT supply chains heavily concentrated in East & South-East Asia, especially China. Overall, the data suggests high supplier concentration in several categories, with the top two to five partners accounting for the majority of extra-EU imports. China alone accounts for 20% or more of the total value of extra-EU imports in 52 out of 85 harmonised product categories (61.2%). US and UK follow from a wider distance, (13/85 product categories or 15.3% each), followed by Türkiye (6/95 product categories or 7.1%) and Switzerland (5/85 product categories or 5.9%). In 2024,

pharmaceutical preparations (~EUR 100.0bn) were highly concentrated: Switzerland (~36.6%) and the United States (~35.0%) together supply ~71% of extra-EU imports, with a second tier (UK, South Korea, Singapore) much smaller. Regarding **Computers & peripherals** (~EUR 93.3bn) and **communication equipment** (~EUR 82.5bn) show very strong Asia-centric concentration. China alone supplies just over half of EU extra-EU imports in both categories (~52% for computers and peripherals; ~54% for communication equipment). The next positions are dominated by Taiwan and Viet Nam, with India and the US present but far smaller. **Electronic components** (~EUR 59.3bn) were somewhat more diversified than finished ICT products but still Asia-led: China (~34%), Taiwan (~15%), Malaysia (~13%), with notable shares for Israel (~6%) and South Korea (~5%)–suggesting a mix of mass component sourcing (China/SEA) and specialised component niches (Israel/Korea). **Motor vehicles** (~EUR 92.7bn) were more geographically diversified than ICT goods. The top five partners–Türkiye (~17%), China (~16%), UK (~16%), Japan (~14%), US (~9%)–sum to ~72%, but no single partner dominates. In the case of **other organic basic chemicals** (~EUR 70.4bn)**,** the trade is again highly concentrated, with the top five exporting countries accounting for 71% of the extra-EU trade. Here China is leading by a significant margin (~27%), followed by India and USA (13.8% and 13.3% respectively), Switzerland (9%) and UK (7%).

Sector level analysis

Figure 1 A6.4 – Number of enterprises – Total vs Harmonised manufacturing sectors (2019 - 2024, EU-27)



Source: Own elaboration based on Eurostat SBS [sbs_ovw_ac] and [sbs_sc_sca_r2].

In terms of distribution of enterprises by size class, the vast majority (85%) are micro enterprises comprising between 0 and 9 people. The distribution is very similar among enterprises active in harmonised manufacturing sectors, though slightly less concentrated in the 0-9 segment (82%).

Table A6.11 5 – Distribution of enterprises by size class and all vs harmonized manufacturing sectors, 2024 (EU-27)

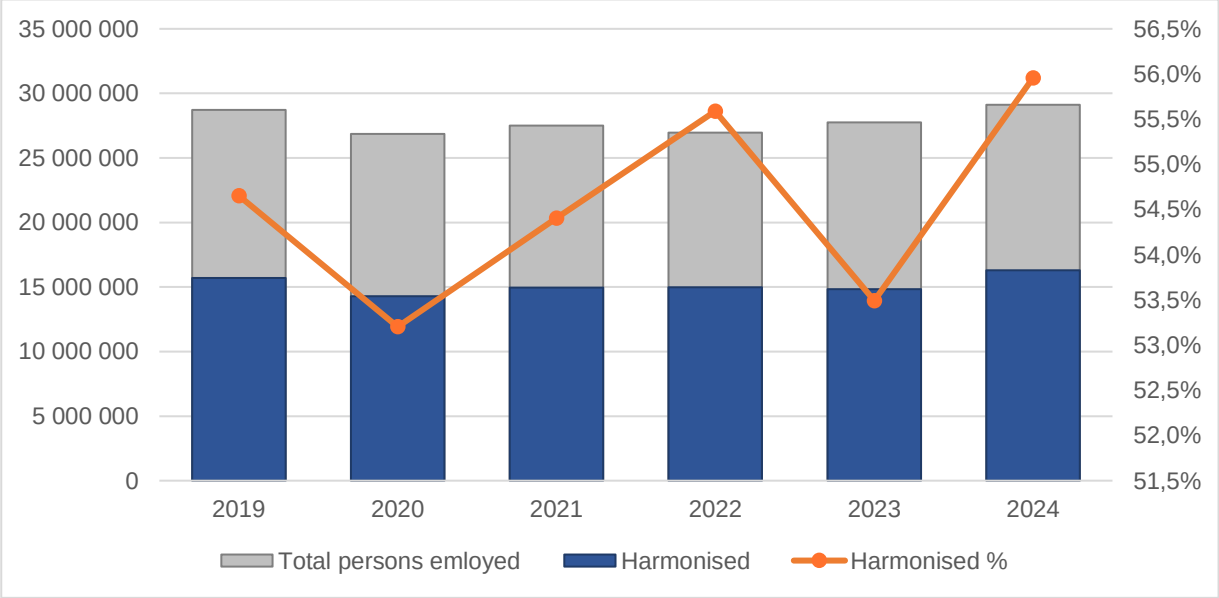
Enterprise size class (headcount)	Share (of total sectors)	Share (of harmonised sectors)
250 and above	0.6%	0.8%
50-249	2.9%	3.8%
20-49	4.6%	5.9%
10-19	6.8%	7.4%
0-9	85.1%	82.1%

Source: Own elaboration, based on Eurostat SBS [sbs_ovw_ac].

The harmonised sectors with the highest average number enterprises are:

- 256 – Treatment and coating of metals: approx. 150 thousand enterprises annually on average between 2019-2024;
- 141 – Manufacture of wearing apparel, except fur apparel: averaging annually approx. 121 thousand enterprises between 2019-2024;
- 251 – Manufacture of structural metal products: averaging annually approx. 118 thousand enterprises between 2019-2024;

Figure 2 A6.5 – Number persons employed– Total vs Harmonised manufacturing sectors (2019 - 2024, EU-27)



Source: Own elaboration based on Eurostat SBS [sbs_ovw_ac] and [sbs_sc_sca_r2].

The distribution of number of employees by enterprise size is fairly similar across all sectors compared to harmonised sectors for the middle brackets, however the workforce is more concentrated in large companies in harmonised sectors compared to all sectors (+4.2 pp).

Table A6.12 6 – Distribution of persons employed by enterprise size class in all vs harmonised manufacturing sectors, 2024 (EU-27)

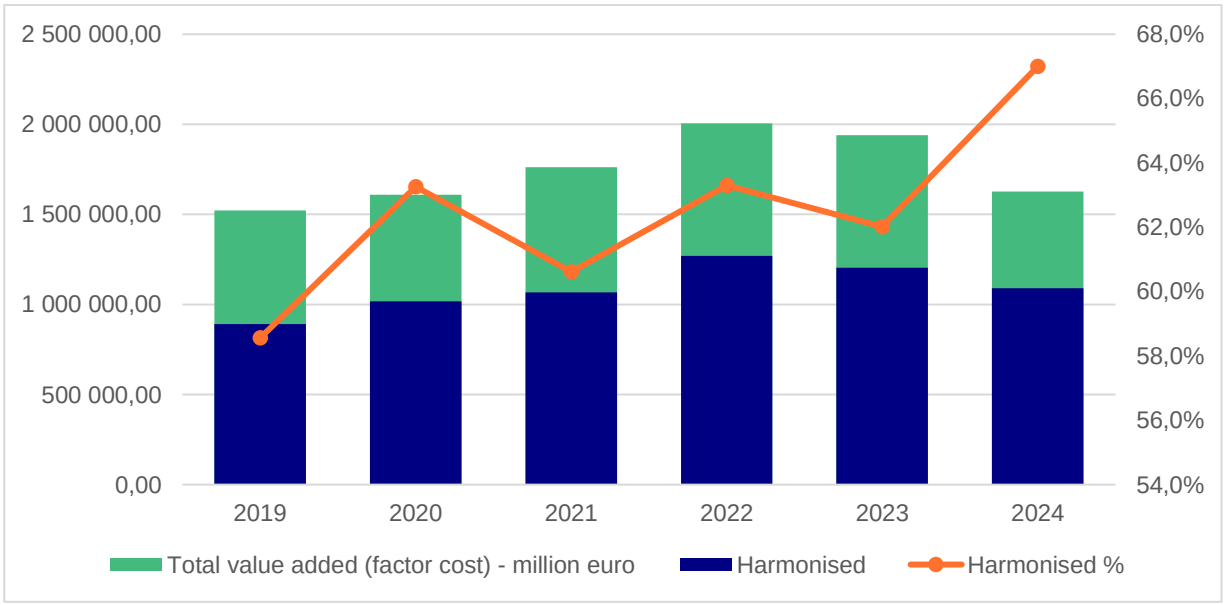
Enterprise size class (headcount)	Share (of total sectors)	Share (of harmonised sectors)
250 and above	48.7%	52.9%
50-249	21.7%	22.0%
20-49	10.7%	10.0%
10-19	6.3%	5.6%
0-9	12.6%	9.6%

Source: Own elaboration, based on Eurostat SBS [sbs_ovw_ac].

The harmonised sectors with the highest average number of persons employed are:

- 222 – Manufacture of plastics products: approx. 1.34 million persons employed annually between 2019-2024;
- 291 - Manufacture of motor vehicles: averaging annually approx. 1.09 million persons employed between 2019-2024;
- 251 – Manufacture of structural metal products: averaging annually approx. 1.06 million persons employed between 2019-2024;

Figure 3 A6.6. – Value added (EUR million)– Total vs Harmonised manufacturing sectors (2019 - 2024, EU-27).



Source: Own elaboration based on Eurostat SBS [sbs_ovw_ac] and [sbs_sc_sca_r2].

The distribution of value added by enterprise size is broadly similar across both datasets in the middle brackets. Value added is more concentrated in large companies in harmonised sectors compared to all sectors (in 2023, large firms account for ~676.1% of harmonised value added vs ~64.3% in total sectors, a difference of +3.3 pp).

Table A6.13 - 7Value added by enterprise size in all vs harmonised manufacturing sectors, 2023 (EU-27)

Enterprise size class (headcount)	Share (of total sectors)	Share (of harmonised sectors)
250 and above	64.3%	67.6%
50-249	18.9%	18%
20-49	7.5%	7%
10-19	4.3%	3.7%
0-9	5.1%	3.8%

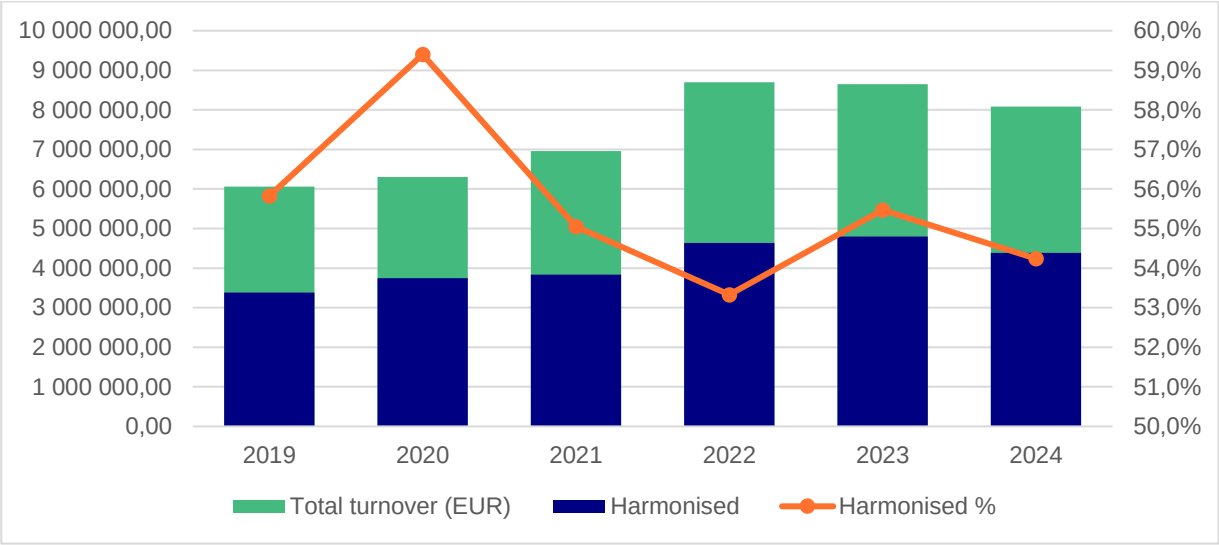
Source: Own elaboration based on Eurostat SBS [sbs_ovw_ac].

The harmonised sectors with the highest average value added at factor cost are:

- 212 – Manufacture of pharmaceutical preparations: EUR 141 billion annually between 2020-2023;
- 291 - Manufacture of motor vehicles: averaging annually approx. EUR 136 billion between 2019-2023;
- 201 - Basic chemicals fertilisers/plastics and synthetic rubber (primary forms): approx. EUR 96 in 2022 only.

Regarding the **total turnover (or gross premiums written)** across all manufacturing sectors, there has been an overall growth of 33.3% from 2019 to 2024, with turnover already increasing in 2020 (+4.0% compared to 2019) and then accelerating strongly to a peak in 2022 (+25.0% compared to 2021), before stabilising in 2023 (-0.6% vs 2022) and declining in 2024 (-6.6% vs 2023). For harmonised sectors, turnover has grown by 29.5% from 2019 to 2024, with the biggest jump between 2021 and 2022 (+21.1%), suggesting that the 2022 surge in turnover was also a major inflection point for harmonised sectors (though slightly less pronounced than for total sectors). On average, 55.5% of total turnover came from harmonised sectors each year during the observed period, with coverage peaking in 2020 (59.4%) and reaching its lowest point in 2022 (53.3%).

Figure A6.74 – Turnover (EUR) – Total vs Harmonised manufacturing sectors (2019 - 2024 , EU-27).



Source: Own elaboration based on Eurostat SBS [sbs_ovw_ac] and [sbs_sc_sca_r2].

The distribution of turnover by enterprise size is fairly similar across all sectors compared to harmonised sectors for the middle brackets; however, turnover is more concentrated in large companies in harmonised sectors compared to all sectors (in 2024, firms with 250+ employees account for 73.2% of harmonised turnover vs 70.1% in total sectors, +3.1 percentage points).

Table A6.148 – Turnover by enterprise size in all vs harmonised manufacturing sectors, 2024 (EU-27)

Enterprise size class (headcount)	Share (of total sectors)	Share (of harmonised sectors)
250 and above	70.1%	73.2%
50-249	16.8%	15.2%
20-49	6.2%	5.6%
10-19	3.2%	2.8%
0-9	3.8%	3.1%

Source: Own elaboration, based on Eurostat SBS [sbs_ovw_ac]

The harmonised sectors with the highest average turnover are:

- 291 - Manufacture of motor vehicles: averaging annually approx. EUR 870 billion between 2019-2024;
- 201 - Basic chemicals, fertilisers/plastics and synthetic rubber (primary forms): approx. EUR 392 billion annually from 2020-2024;
- 212 – Manufacture of pharmaceutical preparations: EUR 388 billion annually between 2020-2024.

The harmonised product categories that are most imported into the EU, which together make up more than 50% of the trade value of all harmonised products, are as follows:

Table A6.15 9– Extra EU harmonised imports value as a share of consumption value of all harmonised goods by product category - EU27, 2024

NACE code	Product description	Extra EU imports value as a share of trade value of all harmonised goods
2120	Manufacture of pharmaceutical preparations	7.71%
2630	Manufacture of communication equipment	6.88%
2910	Manufacture of motor vehicles	6.72%
2620	Manufacture of computers and peripheral equipment	6.48%
2014	Manufacture of other organic basic chemicals	5.46%
2611	Manufacture of electronic components	4.63%
3250	Manufacture of medical and dental instruments and supplies	3.30%
1413	Manufacture of underwear and outerwear	2.84%
2790	Manufacture of other electrical equipment	2.70%
2932	Manufacture of other parts and accessories for motor vehicles	2.30%
2059	Manufacture of other chemical products	2.26%

Source: Own elaboration based on Eurostat Prodcom - statistics by product 2026 [ds-059358].

Table A6.16: Import and trade values for harmonised products, by NACE category – 2024, EU-27

Code	Description	Exports value 2024	Imports value 2024	Sold production value 2024	Consumption value 2024	% Imports value from all harmonised products	%Imports value from all products
1200	Manufacture of tobacco products	7,187,137,075	3,106,341,712	10,035,703,549	5,954,908,186	0.24%	0.17%
1392	Manufacture of household textiles and made-up furnishing articles	3,533,293,209	12,554,569,937	11,668,693,676	20,689,970,404	0.98%	0.69%
1413	Manufacture of underwear and outerwear	17,445,009,964	36,323,002,484	10,155,640,209	29,033,632,729	2.84%	2.01%
1414	Manufacture of underwear and outerwear	7,221,086,865	21,725,405,850	4,932,215,422	19,436,534,407	1.70%	1.20%
1419	Manufacture of underwear and outerwear	7,826,925,159	12,191,733,494	3,904,823,135	8,269,631,470	0.95%	0.67%
1520	Manufacture of footwear	15,105,131,442	21,849,234,577	15,398,040,031	22,142,143,166	1.71%	1.21%
2013	Manufacture of other inorganic basic chemicals	10,301,832,616	11,265,053,398	28,374,809,838	29,338,030,620	0.88%	0.62%
2014	Manufacture of other organic basic chemicals	48,920,771,278	69,839,706,897	99,962,955,230	120,881,890,849	5.46%	3.86%
2015	Manufacture of fertilisers and nitrogen compounds	5,215,553,162	7,832,322,044	21,742,566,407	24,359,335,289	0.61%	0.43%
2020	Manufacture of pesticides, disinfectants and other agrochemical products	5,384,085,757	1,666,753,285	9,695,654,190	5,978,321,718	0.13%	0.09%
2030	Manufacture of paints, varnishes and similar coatings, printing ink and mastics	9,703,702,225	3,177,917,563	33,098,928,664	26,573,144,002	0.25%	0.18%
2041	Manufacture of soap and detergents, cleaning and polishing preparations	8,112,086,499	3,639,490,717	22,115,110,330	17,642,514,548	0.28%	0.20%
2042	Manufacture of perfume and toilet preparations	33,953,771,984	9,389,701,940	35,017,198,766	10,453,128,722	0.73%	0.52%

Code	Description	Exports value 2024	Imports value 2024	Sold production value 2024	Consumption value 2024	% Imports value from all harmonised products	%Imports value from all products
2051	Manufacture of liquid biofuels	906,684,322	838,064,714	2,689,065,604	2,620,445,996	0.07%	0.05%
2059	Manufacture of other chemical products	40,087,987,147	28,916,508,558	65,250,505,926	54,079,027,337	2.26%	1.60%
2120	Manufacture of pharmaceutical preparations	271,765,051,302	98,669,857,277	206,516,788,352	33,421,594,327	7.71%	5.45%
2211	Manufacture, retreading and rebuilding of rubber tyres and manufacture of	9,028,941,343	10,428,575,394	21,527,573,932	22,927,207,983	0.81%	0.58%
2221	Manufacture of plastic plates, sheets, tubes and profiles	16,662,132,348	11,555,484,317	65,300,510,237	60,193,862,206	0.90%	0.64%
2223	Manufacture of doors and windows of plastic	3,212,711,592	3,509,073,578	30,943,379,193	31,239,741,179	0.27%	0.19%
2313	Manufacture of hollow glass	2,918,456,034	2,253,681,696	15,008,059,520	14,343,285,182	0.18%	0.12%
2332	Manufacture of bricks, tiles and construction products, in baked clay	462,835,482	95,681,777	5,223,166,817	4,856,013,112	0.01%	0.01%
2351	Manufacture of cement	1,048,371,399	877,219,270	19,806,202,663	19,635,050,534	0.07%	0.05%
2352	Manufacture of lime and plaster	188,280,051	134,041,721	4,357,091,469	4,302,853,139	0.01%	0.01%
2361	Manufacture of concrete products for construction purposes	721,603,412	185,094,183	28,191,421,605	27,654,912,376	0.01%	0.01%
2362	Manufacture of plaster products for construction purposes	327,989,801	90,075,295	3,700,000,000	3,462,085,494	0.01%	0.0050%
2363	Manufacture of ready-mixed concrete	29,111,305	8,752,831	24,000,000,000	23,979,641,526	0.001%	0.0005%
2364	Manufacture of mortars	308,423,394	29,575,640	7,068,423,507	6,789,575,753	0.002%	0.0016%

Code	Description	Exports value 2024	Imports value 2024	Sold production value 2024	Consumption value 2024	% Imports value from all harmonised products	%Imports value from all products
2365	Manufacture of fibre cement	211,631,549	106,949,945	1,214,283,038	1,109,601,434	0.01%	0.01%
2420	Manufacture of tubes, pipes, hollow profiles and related fittings, of steel	11,352,948,536	5,271,164,782	27,618,669,632	21,536,885,878	0.41%	0.29%
2451	Casting of iron	376,320,571	396,072,090	11,986,236,493	12,005,988,012	0.03%	0.02%
2511	Manufacture of metal structures and parts of structures	10,868,871,433	6,620,751,873	86,690,913,397	82,442,793,837	0.52%	0.37%
2521	Manufacture of central heating radiators, steam generators and boilers	1,496,949,065	869,551,883	8,518,641,879	7,891,244,697	0.07%	0.05%
2530	Manufacture of weapons and ammunition	1,233,839,564	388,380,637	3,822,063,529	2,976,604,602	0.03%	0.02%
2561	Manufacture of cutlery	-	-	27,096,335,192	27,096,335,192	-	-
2562	Manufacture of locks and hinges	-	-	66,869,471,303	66,869,471,303	-	-
2591	Manufacture of steel drums and similar containers	536,124,644	375,681,340	2,560,000,000	2,399,556,696	0.03%	0.02%
2592	Manufacture of light metal packaging	2,729,028,427	1,272,605,880	16,122,088,699	14,665,666,152	0.10%	0.07%
2593	Manufacture of wire products, chain and springs	3,998,989,693	3,450,227,749	16,836,069,710	16,287,307,766	0.27%	0.19%
2594	Manufacture of fasteners and screw machine products	5,969,024,212	6,396,928,066	10,351,708,698	10,779,612,552	0.50%	0.35%
2599	Manufacture of other fabricated metal products	16,242,279,102	18,673,341,010	40,993,202,225	43,424,264,133	1.46%	1.03%
2611	Manufacture of electronic components	35,462,270,528	59,281,403,139	42,500,901,054	66,320,033,665	4.63%	3.27%

Code	Description	Exports value 2024	Imports value 2024	Sold production value 2024	Consumption value 2024	% Imports value from all harmonised products	%Imports value from all products
2612	Manufacture of loaded electronic boards	1,224,947,640	2,089,539,780	10,235,219,182	11,099,811,322	0.16%	0.12%
2620	Manufacture of computers and peripheral equipment	30,180,894,740	82,967,972,467	17,815,155,244	70,602,232,971	6.48%	4.58%
2630	Manufacture of communication equipment	31,894,128,880	88,107,452,637	16,983,549,599	73,196,873,356	6.88%	4.86%
2640	Manufacture of consumer electronics	9,152,788,273	17,275,790,785	18,348,238,774	26,471,241,286	1.35%	0.95%
2651	Manufacture of instruments and appliances for measuring, testing and	40,068,629,448	25,234,917,958	73,614,573,510	58,780,862,020	1.97%	1.39%
2660	Manufacture of irradiation, electromedical and electrotherapeutic equipment	19,556,180,577	11,861,516,392	15,877,647,530	8,182,983,345	0.93%	0.65%
2711	Manufacture of electric motors, generators and transformers	17,619,833,282	14,606,948,392	42,671,805,709	39,658,920,819	1.14%	0.81%
2712	Manufacture of electricity distribution and control apparatus	31,255,697,675	16,169,015,270	55,597,385,411	40,510,703,006	1.26%	0.89%
2720	Manufacture of batteries and accumulators	10,934,150,079	27,989,772,135	30,755,291,423	47,810,913,479	2.19%	1.55%
2731	Manufacture of fibre optic cables	1,204,569,137	1,193,739,391	2,353,996,867	2,343,167,121	0.09%	0.07%
2732	Manufacture of other electronic and electric wires and cables	8,195,210,251	5,254,305,152	30,124,666,449	27,183,761,350	0.41%	0.29%
2733	Manufacture of wiring devices	12,893,138,016	9,021,663,422	18,276,882,139	14,405,407,545	0.70%	0.50%
2740	Manufacture of lighting equipment	8,383,495,445	10,887,990,940	17,515,573,647	20,020,069,142	0.85%	0.60%

Code	Description	Exports value 2024	Imports value 2024	Sold production value 2024	Consumption value 2024	% Imports value from all harmonised products	%Imports value from all products
2751	Manufacture of electric domestic appliances	12,468,366,585	23,988,793,128	28,180,506,816	39,700,933,359	1.87%	1.32%
2790	Manufacture of other electrical equipment	29,490,993,983	34,568,843,774	52,643,655,664	57,721,505,455	2.70%	1.91%
2811	Manufacture of engines and turbines, except aircraft, vehicle and cycle engines	27,174,841,673	15,714,107,396	45,022,015,338	33,561,281,061	1.23%	0.87%
2812	Manufacture of fluid power equipment	10,278,852,744	5,763,346,597	15,919,069,481	11,403,563,334	0.45%	0.32%
2813	Manufacture of other pumps and compressors	24,350,350,404	11,291,846,548	31,961,886,746	18,903,382,890	0.88%	0.62%
2814	Manufacture of other taps and valves	17,603,764,458	9,624,667,240	28,011,166,840	20,032,069,622	0.75%	0.53%
2815	Manufacture of bearings, gears, gearing and driving elements	19,235,367,315	11,109,294,376	33,208,525,909	25,082,452,970	0.87%	0.61%
2821	Manufacture of ovens, furnaces and permanent household heating equipment	3,709,941,040	851,166,249	5,293,798,097	2,435,023,306	0.07%	0.05%
2822	Manufacture of lifting and handling equipment	25,100,455,738	8,340,818,632	59,793,563,318	43,033,926,212	0.65%	0.46%
2823	Manufacture of office machinery and equipment, except computers and peripheral equipment	3,547,590,661	5,867,435,866	1,736,000,000	4,055,845,205	0.46%	0.32%
2824	Manufacture of power-driven hand tools	2,361,461,803	4,034,310,011	3,834,602,892	5,507,451,100	0.32%	0.22%
2825	Manufacture of non-domestic air conditioning equipment	21,418,608,851	15,486,988,998	45,803,406,462	39,871,786,609	1.21%	0.85%

Code	Description	Exports value 2024	Imports value 2024	Sold production value 2024	Consumption value 2024	% Imports value from all harmonised products	%Imports value from all products
2829	Manufacture of other general-purpose machinery	35,721,786,146	12,284,348,821	55,658,964,357	32,221,527,032	0.96%	0.68%
2830	Manufacture of agricultural and forestry machinery	15,776,319,359	6,365,649,638	45,660,761,041	36,250,091,320	0.50%	0.35%
2841	Manufacture of metal forming machinery and machine tools for metal work	12,212,882,449	5,331,893,558	25,171,749,268	18,290,760,377	0.42%	0.29%
2891	Manufacture of machinery for metallurgy	2,097,428,053	514,219,292	4,347,041,299	2,763,832,538	0.04%	0.03%
2892	Manufacture of machinery for mining, quarrying and construction	19,486,367,744	10,722,869,420	31,541,694,406	22,778,196,082	0.84%	0.59%
2893	Manufacture of machinery for food, beverage and tobacco processing	10,183,924,147	1,922,718,166	20,010,562,122	11,749,356,141	0.15%	0.11%
2894	Manufacture of machinery for textile, apparel and leather production	5,467,434,204	1,331,577,882	7,515,596,079	3,379,739,757	0.10%	0.07%
2895	Manufacture of machinery for paper and paperboard production	4,622,342,835	1,069,336,526	7,224,235,936	3,671,229,627	0.08%	0.06%
2896	Manufacture of plastics and rubber machinery	8,254,013,168	2,055,257,851	16,556,745,663	10,357,990,346	0.16%	0.11%
2899	Manufacture of other special-purpose machinery	55,006,638,823	16,313,280,599	84,603,299,611	45,909,941,387	1.27%	0.90%
2910	Manufacture of motor vehicles	189,331,804,577	85,956,035,725	421,821,472,995	318,445,704,143	6.72%	4.75%
2920	Manufacture of bodies and coachwork for motor vehicles; manufacture of trailers and semi-trailers	4,638,562,894	2,238,510,288	41,486,488,202	39,086,435,596	0.17%	0.12%

Code	Description	Exports value 2024	Imports value 2024	Sold production value 2024	Consumption value 2024	% Imports value from all harmonised products	%Imports value from all products
2931	Manufacture of electrical and electronic equipment for motor vehicles	5,826,580,878	14,088,974,078	28,902,830,473	37,165,223,673	1.10%	0.78%
2932	Manufacture of other parts and accessories for motor vehicles	55,050,130,165	29,477,046,170	222,076,629,196	196,503,545,201	2.30%	1.63%
3011	Building of civilian ships and floating structures	-	-	17,414,617,548	17,414,617,548	-	-
3012	Building of pleasure and sporting boats	10,501,083,491	3,617,935,021	13,219,388,880	6,336,240,410	0.28%	0.20%
3020	Manufacture of railway locomotives and rolling stock	4,537,072,577	2,206,173,142	29,664,909,419	27,334,009,984	0.17%	0.12%
3230	Manufacture of sports goods	2,845,156,913	5,129,377,348	4,354,488,681	6,638,709,116	0.40%	0.28%
3240	Manufacture of games and toys	3,628,032,929	8,592,800,299	5,408,222,460	10,372,989,830	0.67%	0.47%
3250	Manufacture of medical and dental instruments and supplies	56,407,998,345	42,250,552,014	59,959,584,230	45,802,137,899	3.30%	2.33%
3299	Other manufacturing	4,529,529,068	7,951,147,364	8,862,348,300	12,283,966,596	0.62%	0.44%
3832	Landfilling or permanent storage	9,474,250,047	10,070,515,701	25,005,172,787	25,601,438,441	0.79%	0.56%

Table A6.17: Top 5 exporting countries to the EU by type of harmonised goods – 2024

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
2120	Pharmaceutical preparations	100,008,815,079	Switzerland (incl. Liechtenstein 'LI' -> 1994)	36,619,062,175	36.62%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	35,018,795,968	35.02%
			United Kingdom	8,018,952,293	8.02%
			Korea, Republic of (South Korea)	4,599,585,250	4.60%
			Singapore	3,255,058,649	3.25%
2620	Computers and peripheral equipment	93,327,220,950	China	48,879,318,582	52.37%
			Taiwan	11,266,012,520	12.07%
			Viet Nam (incl. North Viet Nam 'VD' from 1977)	7,150,779,416	7.66%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	5,987,096,518	6.42%
			Thailand	5,753,410,328	6.16%
2910	Motor vehicles	92,656,214,226	Türkiye	15,842,642,430	17.10%
			China	14,813,369,179	15.99%
			United Kingdom	14,382,170,050	15.52%
			Japan	12,850,120,395	13.87%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	8,743,108,486	9.44%
2630	Communication equipment	82,464,634,095	China	44,340,575,503	53.77%
			Viet Nam (incl. North Viet Nam 'VD' from 1977)	9,852,936,701	11.95%
			India	8,540,977,018	10.36%
			Taiwan	3,916,724,852	4.75%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	3,661,250,901	4.44%
2014	Other organic basic chemicals	70,046,849,096	China	18,869,441,770	26.94%
			India	9,704,866,014	13.85%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	9,364,613,178	13.37%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	6,636,216,053	9.47%
			United Kingdom	5,177,671,474	7.39%
2611	Electronic components	59,256,257,003	China	20,251,199,948	34.18%
			Taiwan	8,845,727,834	14.93%
			Malaysia	7,895,843,954	13.32%
			Israel (incl. West Bank and Gaza Strip 'XP' -> 1994)	3,763,284,941	6.35%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
			Korea, Republic of (South Korea)	3,130,342,877	5.28%
3250	Medical and dental instruments and supplies	40,521,286,942	United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	13,466,021,715	33.23%
			China	5,602,980,091	13.83%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	4,301,975,559	10.62%
			Mexico	3,455,503,644	8.53%
			United Kingdom	2,132,989,435	5.26%
2932	Other parts and accessories for motor vehicles	32,386,982,788	China	7,644,280,478	23.60%
			Türkiye	4,996,113,749	15.43%
			United Kingdom	3,024,061,185	9.34%
			Korea, Republic of (South Korea)	2,733,816,475	8.44%
			Japan	2,648,587,844	8.18%
2651	Measuring, testing and navigation equipment	31,675,535,316	United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	8,490,680,580	26.81%
			China	6,135,822,865	19.37%
			United Kingdom	3,137,559,842	9.91%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	2,767,126,772	8.74%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
			Japan	1,973,422,993	6.23%
2711	Electric motors, generators and transformers	31,648,564,309	China	15,570,532,716	49.20%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	2,290,115,654	7.24%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	1,751,888,584	5.54%
			Japan	1,479,620,431	4.68%
			Türkiye	1,401,471,951	4.43%
2059	Other chemical products n.e.c.	31,051,514,567	United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	8,418,003,336	27.11%
			China	4,795,756,222	15.44%
			United Kingdom	3,539,556,880	11.40%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	2,383,438,531	7.68%
			Korea, Republic of (South Korea)	2,173,716,505	7.00%
2720	Batteries and accumulators	27,422,470,474	China	21,505,860,718	78.42%
			Korea, Republic of (South Korea)	1,482,807,634	5.41%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	829,067,624	3.02%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
			Japan	786,740,380	2.87%
			Viet Nam (incl. North Viet Nam 'VD' from 1977)	503,979,809	1.84%
2751	Electric domestic appliances	24,023,298,984	China	16,884,171,662	70.28%
			Türkiye	2,754,581,783	11.47%
			Malaysia	739,855,575	3.08%
			Philippines	666,313,693	2.77%
			United Kingdom	383,658,601	1.60%
1520	Footwear	22,229,742,472	China	7,690,590,283	34.60%
			Viet Nam (incl. North Viet Nam 'VD' from 1977)	6,010,013,819	27.04%
			Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	1,593,255,080	7.17%
			India	1,098,764,220	4.94%
			Cambodia	652,128,006	2.93%
2790	Other electrical equipment	20,020,693,355	China	8,925,869,820	44.58%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	1,856,081,707	9.27%
			Japan	1,434,744,523	7.17%
			United Kingdom	941,340,333	4.70%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	682,675,265	3.41%
2599	Other fabricated metal products n.e.c.	18,660,054,257	China	9,974,755,981	53.46%
			Türkiye	1,623,261,623	8.70%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	1,473,743,963	7.90%
			United Kingdom	1,168,164,046	6.26%
			India	862,924,612	4.62%
2640	Consumer electronics	18,337,343,510	China	11,693,899,271	63.77%
			Viet Nam (incl. North Viet Nam 'VD' from 1977)	2,451,067,406	13.37%
			Japan	678,916,128	3.70%
			Malaysia	599,087,502	3.27%
			Türkiye	500,508,283	2.73%
2899	Other special-purpose machinery n.e.c.	16,383,697,971	United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	4,294,273,403	26.21%
			China	2,789,673,231	17.03%
			Japan	1,828,449,733	11.16%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	1,680,685,966	10.26%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
			Korea, Republic of (South Korea)	1,435,665,863	8.76%
2712	Electricity distribution and control apparatus	16,217,661,542	China	4,970,057,421	30.65%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	1,947,291,513	12.01%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	1,333,433,037	8.22%
			United Kingdom	977,912,774	6.03%
			Korea, Republic of (South Korea)	888,538,391	5.48%
2811	Engines and turbines, except aircraft, vehicle and cycle engines	15,913,436,579	United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	4,194,415,117	26.36%
			China	2,723,516,773	17.11%
			Türkiye	1,657,032,516	10.41%
			United Kingdom	1,621,266,506	10.19%
			Japan	1,192,859,954	7.50%
2825	Non-domestic air conditioning equipment	14,703,870,444	China	6,015,939,731	40.91%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	1,361,897,505	9.26%
			Thailand	1,328,856,143	9.04%
			Türkiye	1,169,031,001	7.95%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
			United Kingdom	1,009,597,746	6.87%
2013	Other inorganic basic chemicals	14,187,005,766	United Kingdom	1,885,215,346	13.29%
			China	1,598,832,694	11.27%
			Korea, Republic of (South Korea)	1,511,198,123	10.65%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	1,289,911,049	9.09%
			Russian Federation (Russia)	1,026,050,122	7.23%
2931	Electrical and electronic equipment for motor vehicles	14,094,761,134	Morocco	3,602,129,103	25.56%
			Tunisia	1,932,172,799	13.71%
			Serbia	1,606,457,436	11.40%
			China	1,255,752,591	8.91%
			Ukraine	777,852,419	5.52%
2660	Irradiation, electromedical and electrotherapeutic equipment	13,801,884,869	United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	4,843,982,257	35.10%
			China	2,429,512,155	17.60%
			United Kingdom	1,163,899,379	8.43%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	980,971,077	7.11%
			Singapore	734,259,215	5.32%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
2221	Plastic plates, sheets, tubes and profiles	13,601,110,774	China	2,316,603,754	17.03%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	2,241,265,553	16.48%
			United Kingdom	2,109,994,392	15.51%
			Türkiye	1,542,486,999	11.34%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	1,220,427,020	8.97%
3011	Civilian ships and floating structures	13,518,181,276	Korea, Republic of (South Korea)	5,201,838,875	38.48%
			China	3,351,362,040	24.79%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	831,741,419	6.15%
			Singapore	799,676,530	5.92%
			Norway (incl. Svalbard and Jan Mayen 'SJ' -> 1994 and again from 1997)	646,753,685	4.78%
3821	Materials recovery services and secondary raw materials	13,515,223,504	United Kingdom	3,056,354,147	22.61%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	2,686,528,282	19.88%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	1,823,316,913	13.49%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
			South Africa (incl. Namibia 'NA' -> 1989)	542,937,597	4.02%
			Türkiye	540,783,111	4.00%
2829	Other general-purpose machinery n.e.c.	12,462,682,451	China	3,690,829,538	29.62%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	2,525,335,114	20.26%
			United Kingdom	1,386,405,755	11.12%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	1,252,863,571	10.05%
			Japan	590,241,106	4.74%
2740	Lighting equipment	11,974,559,404	China	8,515,277,722	71.11%
			United Kingdom	541,092,002	4.52%
			Korea, Republic of (South Korea)	361,729,135	3.02%
			Taiwan	331,016,519	2.76%
			Türkiye	314,079,262	2.62%
1392	Household textiles and made-up furnishing articles	11,473,032,230	China	4,909,213,896	42.79%
			Pakistan	2,089,125,000	18.21%
			India	1,196,472,561	10.43%
			Türkiye	1,139,994,373	9.94%
			Bangladesh	310,800,313	2.71%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
2813	Other pumps and compressors	11,308,431,087	China	3,742,804,169	33.10%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	1,710,019,546	15.12%
			United Kingdom	1,097,532,892	9.71%
			Japan	877,246,538	7.76%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	691,081,628	6.11%
2815	Bearings, gears, gearing and driving elements	11,140,970,063	China	3,911,302,678	35.11%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	1,492,403,462	13.40%
			India	976,814,009	8.77%
			Japan	944,595,361	8.48%
			United Kingdom	856,530,969	7.69%
2892	Machinery for mining, quarrying and construction	10,610,495,361	China	3,152,317,778	29.71%
			United Kingdom	1,991,835,254	18.77%
			Japan	1,719,066,868	16.20%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	929,588,004	8.76%
			Korea, Republic of (South Korea)	684,077,173	6.45%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
2211	Rubber tyres and tubes; retreading and rebuilding of rubber tyres	10,434,772,617	China	3,458,554,309	33.14%
			Korea, Republic of (South Korea)	1,202,623,745	11.53%
			Türkiye	975,437,400	9.35%
			India	953,375,301	9.14%
			Thailand	638,422,542	6.12%
2814	Other taps and valves	9,649,269,447	China	3,924,115,461	40.67%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	2,008,811,919	20.82%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	819,125,354	8.49%
			United Kingdom	695,302,762	7.21%
			India	420,802,692	4.36%
2042	Perfumes and toilet preparations	9,459,193,185	United Kingdom	2,467,510,149	26.09%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	1,981,995,187	20.95%
			China	1,248,097,578	13.19%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	923,409,252	9.76%
			Korea, Republic of (South Korea)	745,804,609	7.88%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
2733	Wiring devices	9,032,748,758	China	3,453,669,469	38.23%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	1,030,566,251	11.41%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	667,255,409	7.39%
			United Kingdom	530,660,795	5.87%
			Japan	389,832,596	4.32%
3299	Other manufactured goods n.e.c.	8,891,183,707	China	6,130,067,766	68.95%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	488,849,353	5.50%
			United Kingdom	328,072,214	3.69%
			Japan	308,259,723	3.47%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	215,972,348	2.43%
3240	Games and toys	8,568,347,000	China	6,472,776,881	75.54%
			Viet Nam (incl. North Viet Nam 'VD' from 1977)	448,071,901	5.23%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	325,618,349	3.80%
			United Kingdom	246,330,852	2.87%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
			Indonesia (incl. East Timor 'TP' from 1977 -> 2000)	155,928,044	1.82%
2822	Lifting and handling equipment	8,343,351,674	China	3,724,972,925	44.65%
			United Kingdom	1,520,609,643	18.23%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	784,105,851	9.40%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	419,458,895	5.03%
			Japan	354,799,807	4.25%
2015	Fertilisers and nitrogen compounds	7,830,414,280	Russian Federation (Russia)	1,989,221,200	25.40%
			Egypt	1,142,942,302	14.60%
			Morocco	929,612,257	11.87%
			Algeria	485,672,711	6.20%
			Trinidad and Tobago	386,194,828	4.93%
2823	Office machinery and equipment, except computers and peripheral equipment	7,317,752,851	China	2,390,401,691	32.67%
			Japan	1,591,111,879	21.74%
			Malaysia	924,642,521	12.64%
			Viet Nam (incl. North Viet Nam 'VD' from 1977)	616,789,343	8.43%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	301,924,572	4.13%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
2511	Metal structures and parts of structures	6,632,629,381	China	2,631,494,440	39.67%
			Türkiye	1,212,567,466	18.28%
			United Kingdom	750,733,436	11.32%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	361,943,352	5.46%
			Viet Nam (incl. North Viet Nam 'VD' from 1977)	232,497,630	3.51%
2830	Agricultural and forestry machinery	6,482,844,430	China	2,150,443,230	33.17%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	1,346,947,751	20.78%
			United Kingdom	1,169,322,988	18.04%
			Türkiye	363,974,923	5.61%
			Japan	256,791,686	3.96%
2594	Fasteners and screw machine products	6,400,440,967	China	1,615,508,736	25.24%
			Taiwan	1,189,379,790	18.58%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	731,226,174	11.42%
			Türkiye	508,107,242	7.94%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	455,425,285	7.12%
2812	Fluid power	5,762,982,396	China	1,344,440,650	23.33%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
	equipment		United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	1,337,990,580	23.22%
			Türkiye	667,453,096	11.58%
			United Kingdom	607,614,346	10.54%
			India	604,117,179	10.48%
2562	Locks and hinges	5,475,496,286	China	3,153,712,052	57.60%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	442,511,909	8.08%
			Türkiye	333,982,681	6.10%
			United Kingdom	230,048,841	4.20%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	194,390,179	3.55%
2841	Metal forming machinery and machine tools for metal work	5,368,400,521	Switzerland (incl. Liechtenstein 'LI' -> 1994)	1,233,065,485	22.97%
			China	957,915,751	17.84%
			Japan	921,144,914	17.16%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	496,475,610	9.25%
			Korea, Republic of (South Korea)	400,263,006	7.46%
2420	Tubes, pipes,	5,345,038,256	China	1,166,248,073	21.82%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
	hollow profiles and related fittings, of iron or steel		Türkiye	937,502,499	17.54%
			India	513,872,689	9.61%
			United Kingdom	477,965,193	8.94%
			Ukraine	347,177,097	6.50%
2732	Other electronic and electric wires and cables	5,248,854,894	Türkiye	1,240,233,363	23.63%
			China	1,083,131,278	20.64%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	465,502,614	8.87%
			Bosnia and Herzegovina	267,555,785	5.10%
			Egypt	265,175,345	5.05%
3230	Sports goods	5,142,621,007	China	3,414,721,984	66.40%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	268,470,226	5.22%
			United Kingdom	233,672,083	4.54%
			Taiwan	203,145,807	3.95%
			Pakistan	181,845,876	3.54%
2824	Power-driven hand tools	4,035,038,165	China	2,943,040,380	72.94%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	254,577,087	6.31%
			United Kingdom	186,439,525	4.62%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
			Japan	143,497,519	3.56%
			Taiwan	133,576,304	3.31%
3012	Pleasure and sporting boats	3,646,419,968	Cayman Islands	1,847,234,069	50.66%
			United Kingdom	542,168,355	14.87%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	195,750,408	5.37%
			Türkiye	170,789,083	4.68%
			Mexico	116,576,289	3.20%
2041	Soap and detergents, cleaning and polishing preparations	3,643,360,884	United Kingdom	1,138,650,383	31.25%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	602,270,681	16.53%
			China	415,844,029	11.41%
			Serbia	335,565,129	9.21%
			Türkiye	278,850,163	7.65%
2593	Wire products, chain and springs	3,457,105,485	China	1,097,895,344	31.76%
			Türkiye	709,070,355	20.51%
			United Kingdom	249,436,500	7.22%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	193,673,692	5.60%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	181,119,884	5.24%
2030	Paints, varnishes and similar coatings, printing ink and mastics	3,178,273,361	United Kingdom	1,013,020,590	31.87%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	681,885,622	21.45%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	399,512,183	12.57%
			China	196,672,022	6.19%
			Japan	187,321,974	5.89%
2920	Bodies and coachwork for motor vehicles; trailers and semi-trailers	2,303,945,382	China	827,570,804	35.92%
			Türkiye	452,370,094	19.63%
			United Kingdom	356,294,851	15.46%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	195,389,435	8.48%
			Serbia	104,012,708	4.51%
2051	Liquid biofuels	2,301,308,739	China	708,965,410	30.81%
			Malaysia	449,179,454	19.52%
			United Kingdom	374,547,578	16.28%
			Argentina	317,875,057	13.81%
			Korea, Republic of (South Korea)	90,164,221	3.92%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
3020	Railway locomotives and rolling stock	2,276,517,585	Switzerland (incl. Liechtenstein 'LI' -> 1994)	629,021,936	27.63%
			China	480,800,325	21.12%
			Serbia	321,323,247	14.11%
			Türkiye	320,243,214	14.07%
			Ukraine	131,755,740	5.79%
2313	Hollow glass	2,256,920,450	China	1,094,088,610	48.48%
			Türkiye	266,483,479	11.81%
			United Kingdom	240,634,337	10.66%
			Ukraine	133,266,211	5.90%
			India	98,867,586	4.38%
2821	Ovens, furnaces and permanent household heating equipment	2,109,937,801	China	679,165,992	32.19%
			Türkiye	436,836,558	20.70%
			United Kingdom	206,117,835	9.77%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	200,169,818	9.49%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	128,577,784	6.09%
2612	Loaded electronic boards	2,101,135,692	China	1,018,789,998	48.49%
			Thailand	168,851,583	8.04%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	136,084,391	6.48%
			Japan	86,956,005	4.14%
			Korea, Republic of (South Korea)	75,842,322	3.61%
2893	Machinery for food, beverage and tobacco processing	1,954,095,705	China	459,945,430	23.54%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	400,471,025	20.49%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	374,316,953	19.16%
			United Kingdom	194,781,063	9.97%
			Türkiye	135,124,841	6.91%
2896	Plastics and rubber machinery	1,707,227,279	China	661,202,743	38.73%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	243,381,930	14.26%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	239,012,534	14.00%
			Japan	124,594,129	7.30%
			Türkiye	80,647,208	4.72%
2020	Pesticides,	1,667,818,670	United Kingdom	518,785,276	31.11%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
	disinfectants and other agrochemical products		United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	348,336,231	20.89%
			Israel (incl. West Bank and Gaza Strip 'XP' -> 1994)	278,068,912	16.67%
			China	167,973,571	10.07%
			Japan	87,291,040	5.23%
2561	Cutlery	1,507,136,318	China	951,844,205	63.16%
			Viet Nam (incl. North Viet Nam 'VD' from 1977)	135,953,142	9.02%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	85,809,053	5.69%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	72,565,287	4.81%
			Japan	52,245,373	3.47%
2894	Machinery for textile, apparel and leather production	1,404,560,302	China	575,572,347	40.98%
			Viet Nam (incl. North Viet Nam 'VD' from 1977)	130,169,659	9.27%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	123,473,104	8.79%
			Türkiye	113,846,592	8.11%
			Japan	90,365,290	6.43%
2592	Light metal	1,276,715,931	United Kingdom	352,838,990	27.64%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
	packaging		China	284,494,543	22.28%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	185,890,187	14.56%
			Türkiye	125,730,679	9.85%
			Serbia	115,887,674	9.08%
2731	Fibre optic cables	1,204,799,827	China	372,228,330	30.90%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	234,199,145	19.44%
			India	90,302,963	7.50%
			Japan	83,098,962	6.90%
			United Kingdom	77,128,013	6.40%
2895	Machinery for paper and paperboard production and parts thereof	1,063,060,160	China	361,437,833	34.00%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	277,221,583	26.08%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	102,184,305	9.61%
			India	58,217,889	5.48%
			United Kingdom	56,279,957	5.29%
2351	Cement	879,279,494	Türkiye	328,143,279	37.32%
			Ukraine	132,589,326	15.08%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
			Algeria	98,381,917	11.19%
			Tunisia	70,857,635	8.06%
			Egypt	62,834,689	7.15%
2521	Central heating radiators, steam generators and boilers	673,898,521	Türkiye	244,853,336	36.33%
			China	192,950,731	28.63%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	47,405,442	7.03%
			Korea, Republic of (South Korea)	39,287,790	5.83%
			United Kingdom	37,317,842	5.54%
3811	Collection services of non-hazardous waste	625,120,363	United Kingdom	190,576,363	30.49%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	65,591,668	10.49%
			Norway (incl. Svalbard and Jan Mayen 'SJ' -> 1994 and again from 1997)	61,576,780	9.85%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	45,401,773	7.26%
			Russian Federation (Russia)	34,664,581	5.55%
2891	Machinery for	514,184,727	China	207,109,666	40.28%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
	metallurgy and parts thereof		United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	54,514,615	10.60%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	51,476,908	10.01%
			Korea, Republic of (South Korea)	48,411,439	9.42%
			Türkiye	36,189,724	7.04%
2223	Doors, windows and their frames and thresholds for doors; shutters, blinds and similar articles and parts thereof, of plastics	492,477,101	Türkiye	142,789,374	28.99%
			Bosnia and Herzegovina	111,153,858	22.57%
			United Kingdom	52,578,637	10.68%
			China	51,226,401	10.40%
			Ukraine	31,621,463	6.42%
2361	Concrete products for construction purposes	446,477,628	China	141,072,501	31.60%
			Israel (incl. West Bank and Gaza Strip 'XP' -> 1994)	72,673,978	16.28%
			United Kingdom	69,143,519	15.49%
			Bosnia and Herzegovina	40,250,657	9.02%
			Türkiye	33,152,762	7.43%
2451	Casting services of iron	396,296,097	China	182,885,056	46.15%
			India	59,355,280	14.98%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
			United Kingdom	45,811,450	11.56%
			Türkiye	34,504,470	8.71%
			United Arab Emirates	13,635,222	3.44%
2591	Steel drums and similar containers	375,327,304	China	106,822,278	28.46%
			United Kingdom	66,472,013	17.71%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	46,553,837	12.40%
			Türkiye	30,875,251	8.23%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	29,809,548	7.94%
3812	Collection services of hazardous waste	244,914,856	United Kingdom	79,154,320	32.32%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	48,454,842	19.78%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	24,681,098	10.08%
			China	14,498,980	5.92%
			Norway (incl. Svalbard and Jan Mayen 'SJ' -> 1994 and again from 1997)	13,999,612	5.72%
2352	Lime and plaster	134,092,420	United Kingdom	60,263,458	44.94%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
			Norway (incl. Svalbard and Jan Mayen 'SJ' -> 1994 and again from 1997)	33,938,525	25.31%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	6,459,675	4.82%
			Türkiye	5,249,098	3.91%
			Bosnia and Herzegovina	5,224,700	3.90%
2365	Articles of fibre cement	106,836,970	China	38,733,321	36.25%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	20,142,605	18.85%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	18,545,004	17.36%
			Türkiye	10,133,859	9.49%
			United Kingdom	4,420,636	4.14%
2332	Bricks, tiles and construction products, in baked clay	95,674,690	Serbia	54,482,224	56.95%
			United Kingdom	20,691,293	21.63%
			China	3,905,745	4.08%
			Egypt	3,147,388	3.29%
			North Macedonia	2,467,244	2.58%
2362	Plaster products for construction purposes	90,028,815	Norway (incl. Svalbard and Jan Mayen 'SJ' -> 1994 and again from 1997)	36,316,650	40.34%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
			United Kingdom	25,230,707	28.03%
			Türkiye	12,105,074	13.45%
			China	8,889,691	9.87%
			United States (incl. Navassa Island (part of 'UM') from 1995 -> 2000)	3,527,593	3.92%
2364	Mortars	29,454,619	United Kingdom	15,518,231	52.69%
			Norway (incl. Svalbard and Jan Mayen 'SJ' -> 1994 and again from 1997)	5,103,006	17.32%
			Canada	2,040,799	6.93%
			Serbia	1,650,372	5.60%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	1,115,746	3.79%
2363	Ready-mixed concrete	8,933,955	Norway (incl. Svalbard and Jan Mayen 'SJ' -> 1994 and again from 1997)	4,090,374	45.78%
			United Kingdom	3,853,559	43.13%
			Bosnia and Herzegovina	641,409	7.18%
			Switzerland (incl. Liechtenstein 'LI' -> 1994)	223,118	2.50%
			Countries and territories not specified within the framework of intra-Union trade	46,486	0.52%

PRODUCT (Codes)	PRODUCT (Labels)	Extra-EU27 total (EUR)	Top 5 exporting country	Value (EUR)	% of total
1421	Outerwear	31,836,832,236	China	8,080,003,049	25.38%
			Bangladesh	6,261,401,493	19.67%
			Türkiye	3,454,482,346	10.85%
			India	1,773,854,644	5.57%
			Morocco	1,676,233,485	5.27%
1422	Underwear, other than knitted or crocheted	2,538,139,743	China	886,726,807	34.94%
			Bangladesh	381,411,877	15.03%
			Sri Lanka	212,354,501	8.37%
			Viet Nam (incl. North Viet Nam 'VD' from 1977)	192,250,528	7.57%
			Türkiye	152,379,394	6.00%
1423	Workwear	1,825,117,351	Tunisia	317,980,447	17.42%
			China	311,993,085	17.09%
			Bangladesh	190,984,677	10.46%
			Pakistan	115,473,895	6.33%
			Viet Nam (incl. North Viet Nam 'VD' from 1977)	110,100,355	6.03%

Table A6.18 - Business activity statistics by harmonised sector (2019-2024, EU-27)

Code	Activity	Indicator	2019	2020	2021	2022	2023	2024
120	Manufacture of tobacco products	Enterprises - number	305	319	300	n/a	300	294
		Persons employed - number	41.203	39.861	39.102	38.272	41.573	43.584
		Turnover or gross premiums written - million euro	36.943	39.088	24.568,44	25.603	28.184,77	29.679,98
		Value added at factor cost - million euro	7.461	8.841	7.833,69	8.184,02	9.041,83	n/a
139	Manufacture of other textiles	Enterprises - number	44.000	45.000	47.389	48.733	49.191	47.833
		Persons employed - number	360.000	353.008	n/a	n/a	n/a	n/a
		Turnover or gross premiums written - million euro	n/a	n/a	n/a	n/a	n/a	n/a
		Value added at factor cost - million euro	n/a	14.119	n/a	n/a	n/a	n/a
152	Manufacture of footwear	Enterprises - number	18.800	17.400	17.165	16.788	16.000	15.158
		Persons employed - number	n/a	n/a	222.000	226.979	219.000	200.000
		Turnover or gross premiums written - million euro	26.425	20.600	23.100	28.582,65	27.600	25.275,99
		Value added at factor cost - million euro	7.452	5.650	6.600	8.000	7.970	n/a
201	Manufacture of basic chemicals, fertilisers and nitrogen compounds, plastics and synthetic rubber in primary forms	Enterprises - number	8.000	8.000	8.000	8.410	n/a	8.540
		Persons employed - number	n/a	n/a	n/a	555.844	n/a	554.768
		Turnover or gross premiums written - million euro	n/a	300.000	400.000	483.881,82	400.000	378.000

Code	Activity	Indicator	2019	2020	2021	2022	2023	2024
		Value added at factor cost - million euro	n/a	n/a	n/a	96.100	n/a	n/a
202	Manufacture of pesticides and other agrochemical products	Enterprises - number	544	618	612	633	596	596
		Persons employed - number	27.924	29.814	26.991	31.737	32.065	31.285
		Turnover or gross premiums written - million euro	12.214	13.817	11.269,93	17.986,63	16.551,32	15.884,15
		Value added at factor cost - million euro	3.089	3.237	2.819,53	3.767	3.474,01	n/a
203	Manufacture of paints, varnishes and similar coatings, printing ink and mastics	Enterprises - number	3.300	3.200	3.202	3.152	3.131	3.154
		Persons employed - number	149.283	145.324	144.270	144.000	140.000	148.000
		Turnover or gross premiums written - million euro	41.768	40.634	45.190,08	49.000	48.998,07	50.000
		Value added at factor cost - million euro	11.409	11.849	12.289,59	11.800	13.000	n/a
204	Manufacture of washing, cleaning and polishing preparations	Enterprises - number	10.000	11.000	12.000	n/a	13.000	12.871
		Persons employed - number	272.324	290.849	n/a	n/a	n/a	n/a
		Turnover or gross premiums written - million euro	n/a	n/a	n/a	n/a	n/a	n/a
		Value added at factor cost - million euro	n/a	23.853	n/a	n/a	n/a	n/a
205	Manufacture of other chemical products	Enterprises - number	6.000	6.000	6.000	6.060	5.980	6.000
		Persons employed - number	180.000	175.418	195.899	202.000	200.000	200.000
		Turnover or gross premiums written - million euro	80.195	80.000	100.930,31	111.000	91.700	90.000

Code	Activity	Indicator	2019	2020	2021	2022	2023	2024
		Value added at factor cost - million euro	21.000	19.000	25.205,88	25.411,34	24.000	n/a
212	Manufacture of pharmaceutical preparations	Enterprises - number	3.009	3.000	3.191	3.000	3.116	3.200
		Persons employed - number	568.910	575.727	567.434	577.545	600.730	614.000
		Turnover or gross premiums written - million euro	n/a	321.377	367.432	370.240,28	428.650,84	451.832,19
		Value added at factor cost - million euro	n/a	125.432	133.080,45	137.181,97	167.303,02	n/a
221	Manufacture of rubber products	Enterprises - number	7.940	7.974	8.000	8.000	7.700	7.755
		Persons employed - number	364.181	316.000	327.999	320.178	301.190	300.000
		Turnover or gross premiums written - million euro	80.000	62.856	n/a	n/a	80.000	80.000
		Value added at factor cost - million euro	24.000	18.228	23.265,91	23.364,23	21.747	n/a
222	Manufacture of plastics products	Enterprises - number	47.300	47.473	50.000	50.000	47.000	47.126
		Persons employed - number	1.320.000	1.300.000	1.300.000	1.300.000	1.400.000	1.409.628
		Turnover or gross premiums written - million euro	239.408	230.000	270.000	300.000	320.000	305.000
		Value added at factor cost - million euro	70.700	70.000	80.000	80.000	93.000	n/a
231	Manufacture of glass and glass products	Enterprises - number	13.963	13.794	13.840	14.000	14.000	13.929
		Persons employed - number	310.000	300.000	300.000	304.354	296.945	290.000
		Turnover or gross premiums written - million euro	55.000	50.000	57.828,54	69.277,58	68.505	60.000

Code	Activity	Indicator	2019	2020	2021	2022	2023	2024
		Value added at factor cost - million euro	19.000	17.000	19.308,37	21.600,83	22.550,33	n/a
233	Manufacture of clay building materials	Enterprises - number	2.681	2.740	n/a	2.700	n/a	2.594
		Persons employed - number	104.002	100.000	105.585	104.719	100.349	100.000
		Turnover or gross premiums written - million euro	20.389	19.413	25.012,48	29.396,85	24.104,22	23.270,41
		Value added at factor cost - million euro	7.326	7.142	8.318	9.157,76	8.048,75	n/a
235	Manufacture of cement, lime and plaster	Enterprises - number	700	n/a	814	800	n/a	770
		Persons employed - number	64.395	69.175	70.873	68.356	69.753	69.854
		Turnover or gross premiums written - million euro	21.414	23.485	26.521,91	30.938,65	32.707,67	33.168,37
		Value added at factor cost - million euro	7.465	8.450	8.885,02	10.255,29	12.051,45	n/a
236	Manufacture of articles of concrete, cement and plaster	Enterprises - number	19.850	20.000	20.000	20.334	20.000	19.712
		Persons employed - number	360.000	n/a	n/a	364.050	n/a	357.625
		Turnover or gross premiums written - million euro	73.838	70.000	81.000	90.398,68	90.000	89.988,13
		Value added at factor cost - million euro	21.932	n/a	24.000	25.652,43	n/a	n/a
242	Manufacture of tubes, pipes, hollow profiles and related fittings, of steel	Enterprises - number	1.700	1.686	1.754	1.730	n/a	1.824
		Persons employed - number	n/a	94.000	95.313	91.958	88.912	84.542
		Turnover or gross premiums written - million euro	26.693	22.841	29.652,56	34.715,06	30.800	27.817,92

Code	Activity	Indicator	2019	2020	2021	2022	2023	2024
		Value added at factor cost - million euro	n/a	6.004	7.366,77	7.650,22	7.290,36	n/a
245	Casting of metals	Enterprises - number	4.800	4.740	4.657	4.600	4.600	4.647
		Persons employed - number	220.000	200.000	200.000	200.000	200.000	190.000
		Turnover or gross premiums written - million euro	n/a	30.000	37.000	44.526,14	n/a	38.926,25
		Value added at factor cost - million euro	12.000	10.000	11.000	12.423,47	12.743,24	n/a
251	Manufacture of structural metal products	Enterprises - number	112.903	115.567	119.504	120.000	120.000	120.992
		Persons employed - number	1.010.203	999.414	1.065.100	1.100.000	1.100.000	1.086.841
		Turnover or gross premiums written - million euro	133.428	127.667	153.423,04	180.000	180.000	180.983,64
		Value added at factor cost - million euro	44.339	43.536	51.375,44	60.000	59.000	n/a
252	Manufacture of tanks, reservoirs and containers of metal	Enterprises - number	4.350	n/a	4.501	n/a	n/a	4.215
		Persons employed - number	120.000	116.560	117.984	120.778	118.197	117.000
		Turnover or gross premiums written - million euro	n/a	20.380	24.322,27	27.980,33	28.118,58	25.857,59
		Value added at factor cost - million euro	n/a	6.660	7.661,71	8.137	8.617,26	n/a
253	Manufacture of steam generators, except central heating hot water boilers	Enterprises - number	720	710	670	n/a	653	n/a
		Persons employed - number	23.646	22.498	n/a	20.013	n/a	n/a
		Turnover or gross premiums written - million euro	4.455	3.786	4.132,62	3.921,33	4.058,73	3.713,84

Code	Activity	Indicator	2019	2020	2021	2022	2023	2024
		Value added at factor cost - million euro	1.244	1.103	1.112,61	1.142	1.079,84	n/a
259	Manufacture of other fabricated metal products	Enterprises - number	53.480	56.000	58.890	60.995	62.000	n/a
		Persons employed - number	614.668	600.000	613.189	614.865	610.000	600.000
		Turnover or gross premiums written - million euro	99.016	90.000	108.245	125.000	120.000	120.000
		Value added at factor cost - million euro	31.112	29.000	34.327,43	37.200	37.000	n/a
261	Manufacture of electronic components and boards	Enterprises - number	10.000	10.000	10.000	10.329	10.327	10.528
		Persons employed - number	291.423	294.280	300.000	320.244	n/a	328.000
		Turnover or gross premiums written - million euro	n/a	n/a	n/a	n/a	n/a	110.000
		Value added at factor cost - million euro	n/a	n/a	n/a	n/a	n/a	n/a
262	Manufacture of computers and peripheral equipment	Enterprises - number	5.382	5.402	n/a	5.000	5.091	4.928
		Persons employed - number	67.694	n/a	n/a	n/a	n/a	n/a
		Turnover or gross premiums written - million euro	n/a	n/a	n/a	n/a	n/a	n/a
		Value added at factor cost - million euro	n/a	n/a	n/a	n/a	n/a	n/a
263	Manufacture of communication equipment	Enterprises - number	4.700	4.800	4.500	4.490	n/a	4.290
		Persons employed - number	162.912	150.983	114.546	115.248	110.000	120.000
		Turnover or gross premiums written - million euro	53.710	46.282	39.556,97	43.207	38.626,85	39.258,38

Code	Activity	Indicator	2019	2020	2021	2022	2023	2024
		Value added at factor cost - million euro	13.375	12.758	9.495,51	10.931,49	9.026,75	n/a
264	Manufacture of consumer electronics	Enterprises - number	2.499	2.560	2.546	2.592	2.599	3.000
		Persons employed - number	50.898	44.892	39.455	39.174	37.990	37.889
		Turnover or gross premiums written - million euro	21.481	18.342	16.706,97	17.849,85	16.503	17.019,04
		Value added at factor cost - million euro	3.322	2.633	2.896,82	2.909,48	3.235,75	n/a
266	Manufacture of irradiation, electromedical and electrotherapeutic equipment	Enterprises - number	1.800	1.900	1.800	1.800	1.791	1.823
		Persons employed - number	71.303	72.098	74.126	n/a	n/a	78.278
		Turnover or gross premiums written - million euro	n/a	n/a	30.006,16	29.242,33	30.540,11	33.046,56
		Value added at factor cost - million euro	8.415	8.522	9.638,08	8.952	8.997,29	n/a
271	Manufacture of electric motors, generators, transformers and electricity distribution and control apparatus	Enterprises - number	17.100	16.500	16.102	15.770	15.000	14.685
		Persons employed - number	657.861	607.149	607.000	610.000	660.000	642.000
		Turnover or gross premiums written - million euro	139.981	126.834	142.000	159.000	180.000	177.000
		Value added at factor cost - million euro	44.531	40.064	44.100	48.900	60.000	n/a
272	Manufacture of batteries and accumulators	Enterprises - number	500	550	603	661	715	806
		Persons employed - number	37.417	n/a	n/a	n/a	n/a	n/a
		Turnover or gross premiums written - million euro	13.831	n/a	n/a	n/a	n/a	n/a

Code	Activity	Indicator	2019	2020	2021	2022	2023	2024
		Value added at factor cost - million euro	2.539	n/a	n/a	n/a	n/a	n/a
273	Manufacture of wiring and wiring devices	Enterprises - number	3.800	3.700	3.690	3.700	3.680	3.690
		Persons employed - number	216.415	213.468	233.531	230.000	228.000	227.699
		Turnover or gross premiums written - million euro	n/a	53.000	70.220,51	80.000	n/a	n/a
		Value added at factor cost - million euro	n/a	13.926	18.122	20.000	n/a	n/a
274	Manufacture of electric lighting equipment	Enterprises - number	7.542	7.144	7.163	7.000	6.978	7.000
		Persons employed - number	153.689	n/a	140.000	n/a	134.318	n/a
		Turnover or gross premiums written - million euro	29.300	n/a	n/a	29.842,07	31.067,96	29.378,95
		Value added at factor cost - million euro	8.423	7.000	n/a	8.037,89	8.591,98	n/a
275	Manufacture of domestic appliances	Enterprises - number	3.100	n/a	n/a	n/a	3.394	3.249
		Persons employed - number	211.702	223.567	225.199	220.000	220.000	210.000
		Turnover or gross premiums written - million euro	54.336	58.294	67.270,95	70.000	n/a	n/a
		Value added at factor cost - million euro	12.000	16.900	16.327,81	15.045,63	15.507,42	n/a
279	Manufacture of other electrical equipment	Enterprises - number	10.142	11.838	11.655	12.000	11.554	11.135
		Persons employed - number	230.000	236.000	n/a	n/a	265.475	265.737
		Turnover or gross premiums written - million euro	43.057	39.630	n/a	n/a	56.800	n/a

Code	Activity	Indicator	2019	2020	2021	2022	2023	2024
		Value added at factor cost - million euro	14.464	13.861	n/a	18.000	19.300	n/a
281	Manufacture of general-purpose machinery	Enterprises - number	10.200	n/a	n/a	9.000	9.000	9.200
		Persons employed - number	890.632	829.997	825.425	839.989	852.830	830.000
		Turnover or gross premiums written - million euro	231.444	205.756	222.824,22	244.899	261.884,98	262.000
		Value added at factor cost - million euro	70.984	61.784	71.982,89	74.811,73	77.604,68	n/a
282	Manufacture of other general-purpose machinery	Enterprises - number	32.000	32.000	32.000	31.848	31.449	31.195
		Persons employed - number	1.000.000	1.000.000	1.000.000	1.006.812	1.017.125	1.016.039
		Turnover or gross premiums written - million euro	230.000	210.000	n/a	263.120,52	281.173,75	272.245,43
		Value added at factor cost - million euro	n/a	69.000	76.000	80.273	86.811,63	n/a
283	Manufacture of agricultural and forestry machinery	Enterprises - number	6.000	6.000	6.000	6.000	6.000	6.006
		Persons employed - number	190.000	190.000	200.000	200.000	200.000	198.000
		Turnover or gross premiums written - million euro	50.000	50.000	61.000	68.000	77.000	67.400
		Value added at factor cost - million euro	13.100	13.400	17.000	17.000	19.000	n/a
284	Manufacture of metal forming machinery and machine tools	Enterprises - number	7.300	7.400	7.000	7.230	7.020	7.000
		Persons employed - number	236.413	227.160	229.133	230.000	n/a	230.000
		Turnover or gross premiums written - million euro	48.394	40.118	45.569,75	50.000	56.000	n/a

Code	Activity	Indicator	2019	2020	2021	2022	2023	2024
		Value added at factor cost - million euro	17.252	14.109	16.609,14	18.000	19.000	n/a
289	Manufacture of other special-purpose machinery	Enterprises - number	24.000	24.000	n/a	24.534	24.280	24.270
		Persons employed - number	774.092	751.358	757.709	780.000	780.000	800.000
		Turnover or gross premiums written - million euro	185.250	167.291	193.729,49	220.000	230.000	n/a
		Value added at factor cost - million euro	61.018	56.788	69.199,21	72.000	77.000	n/a
291	Manufacture of motor vehicles	Enterprises - number	1.890	2.000	2.240	2.454	n/a	2.820
		Persons employed - number	1.120.000	1.100.000	1.100.000	1.089.950	1.090.000	1.100.000
		Turnover or gross premiums written - million euro	810.000	710.000	800.000	900.000	1.000.000	1.000.000
		Value added at factor cost - million euro	130.996	110.000	132.192,79	148.977,51	159.072,02	n/a
301	Building of ships and boats	Enterprises - number	7.980	8.095	8.444	8.600	8.723	8.950
		Persons employed - number	163.520	169.246	n/a	173.399	n/a	184.000
		Turnover or gross premiums written - million euro	40.101	37.962	n/a	n/a	52.761,49	60.000
		Value added at factor cost - million euro	9.678	8.615	10.000	11.412,04	12.539,94	n/a
302	Manufacture of railway locomotives and rolling stock	Enterprises - number	n/a	783	803	767	734	728
		Persons employed - number	107.726	108.878	111.747	120.689	124.110	128.183
		Turnover or gross premiums written - million euro	25.519	25.016	26.498,78	29.963,27	34.298,95	34.199,06

Code	Activity	Indicator	2019	2020	2021	2022	2023	2024
		Value added at factor cost - million euro	6.719	5.923	6.749,22	7.423,19	8.829,53	n/a
303	Manufacture of air and spacecraft and related machinery	Enterprises - number	1.383	1.417	1.469	1.532	1.600	1.632
		Persons employed - number	n/a	n/a	345.399	358.014	386.378	410.057
		Turnover or gross premiums written - million euro	176.074	127.164	n/a	153.293,42	170.700,95	n/a
		Value added at factor cost - million euro	42.736	33.073	n/a	43.767	45.789,59	n/a
323	Manufacture of sports goods	Enterprises - number	n/a	5.000	5.000	5.380	5.370	5.380
		Persons employed - number	n/a	40.755	43.704	n/a	n/a	n/a
		Turnover or gross premiums written - million euro	7.052	6.146	7.447,89	8.313	8.000	8.000
		Value added at factor cost - million euro	2.181	2.005	2.369,45	2.454,58	n/a	n/a
324	Manufacture of games and toys	Enterprises - number	6.000	6.000	7.000	7.000	7.361	n/a
		Persons employed - number	61.153	57.472	n/a	n/a	n/a	n/a
		Turnover or gross premiums written - million euro	n/a	n/a	n/a	n/a	n/a	n/a
		Value added at factor cost - million euro	n/a	n/a	n/a	n/a	n/a	n/a
325	Manufacture of medical and dental instruments and supplies	Enterprises - number	64.000	n/a	64.606	64.000	63.227	60.768
		Persons employed - number	534.056	n/a	559.301	n/a	600.000	600.000
		Turnover or gross premiums written - million euro	n/a	n/a	105.000	n/a	n/a	n/a

Code	Activity	Indicator	2019	2020	2021	2022	2023	2024
		Value added at factor cost - million euro	34.092	n/a	40.900	n/a	n/a	n/a
329	Manufacturing n.e.c.	Enterprises - number	28.000	29.000	n/a	36.899	40.000	42.000
		Persons employed - number	140.000	141.588	150.000	148.000	150.000	150.000
		Turnover or gross premiums written - million euro	17.000	16.162	19.000	20.600	19.900	20.000
		Value added at factor cost - million euro	5.700	5.534	n/a	6.920	6.870	n/a
141	Manufacture of wearing apparel, except fur apparel	Enterprises - number	117.000	120.000	120.000	124.980	125.098	120.000
		Persons employed - number	770.000	705.000	660.120	656.000	650.000	620.000
		Turnover or gross premiums written - million euro	60.100	50.900	55.306,68	64.000	67.000	65.000
		Value added at factor cost - million euro	18.200	15.000	17.000	19.000	20.000	n/a
143	Manufacture of knitted and crocheted apparel	Enterprises - number	7.514	7.262	7.340	7.345	7.432	7.000
		Persons employed - number	n/a	n/a	81.165	81.014	79.689	n/a
		Turnover or gross premiums written - million euro	n/a	8.755	9.740,86	11.365,55	11.538,06	11.118,67
		Value added at factor cost - million euro	3.000	2.513	2.889,74	3.365,87	3.335	n/a
256	Treatment and coating of metals	Enterprises - number	126.109	130.722	157.771	161.146	163.092	162.999
		Persons employed - number	269.155	260.611	1.076.251	1.092.552	1.101.866	1.090.272
		Turnover or gross premiums written - million euro	21.411	20.175	130.145,18	154.009,74	153.384,35	148.142

Code	Activity	Indicator	2019	2020	2021	2022	2023	2024
		Value added at factor cost - million euro	9.269	8.306	52.820,75	59.201,58	60.538,79	n/a

ANNEX VII. RELEVANT DOCUMENTS

4. TYPE	Title
Market surveillance legislation	Regulation 2019/1020 of the European Parliament and of the Council of 20 June 2019 on market surveillance and compliance of products and amending Directive 2004/42/EC and Regulations (EC) No 765/2008 and (EU) No 305/2011
	Implementing Regulation (EU) 2021/1121 of 8 July 2021 specifying the details of the statistical data to be submitted by the Member States as regards controls on products entering the Union market with regard to product safety and compliance
	Implementing Regulation (EU) 2021/2248 of 16 December 2021 specifying the details of the electronic interface between national customs systems and the information and communication system for market surveillance, and the data to be transmitted by means of that interface
	Implementing Regulation (EU) 2022/1267 of 20 July 2022 specifying the procedures for the designation of Union testing facilities for the purposes of market surveillance and verification of product compliance
	Implementing Regulation (EU) 2023/2712 of 5 December 2023 laying down rules for the application of Regulation (EU) 2019/1020 of the European Parliament and of the Council as regards the details of the information to be transmitted from national customs systems to the information and communication system for market surveillance concerning products placed under the customs procedure 'release for free circulation
	Implementing Regulation (EU) 2024/2216 of 6 September 2024 correcting and amending Implementing Regulation (EU) 2021/2248 specifying the details of the electronic interface between national customs systems and the information and communication system for market surveillance, and the data to be transmitted by means of that interface
	Regulation (EC) 765/2008 setting out the requirements for accreditation and the market surveillance of products
	Decision 768/2008 on a common framework for the marketing of products
Other legislation	Regulation (EU) 2023/988 of the European Parliament and of the Council of 10 May 2023 on general product safety
	Commission Implementing Regulation (EU) 2024/1435 laying down the template for recall notices under Article 36 of the GPSR
	Commission Implementing Regulation (EU) 2024/1459 of 27 May 2024 laying down rules for the application of Regulation (EU) 2023/988 of the European Parliament and of the Council as regards the implementation of the interoperable interface of the Safety Gate Portal for providers of online marketplaces
	Commission Implementing Regulation (EU) 2024/1740 laying down the rules for the application of the GPSR as regards the modalities for consumers and other interested parties to inform the Commission of products that might present a risk to the health and safety of consumers and for the transmission of such information to the national authorities concerned
	Commission Implementing Regulation (EU) 2024/2639 of 9 October 2024 laying down rules for the application of Regulation (EU) 2023/988 of the European Parliament and of the Council as regards the roles and tasks of the single national contact points of the Safety Gate Rapid Alert System

4. TYPE	Title
Relevant studies and reports from EU institutions	Commission Implementing Regulation (EU) 2024/2958 of 29 November 2024 determining the output indicators relevant for Regulation (EU) 2023/988 of the European Parliament and of the Council on general product safety
	Commission Delegated Regulation (EU) 2024/3173 of 27 August 2024 supplementing Regulation (EU) 2023/988 supplementing Regulation (EU) 2023/988 of the European Parliament and of the Council with regard to rules on access to and operation of the Safety Gate Rapid Alert System, information to be entered in that System, notification requirements and the criteria for assessment of the level of risk
	Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act)
	Directive (EU) 2024/2853 of the European Parliament and of the Council of 23 October 2024 on liability for defective products and repealing Council Directive 85/374/EEC
	Regulation (EU) 2024/3110 of the European Parliament and of the Council of 27 November 2024 laying down harmonised rules for the marketing of construction product
	European Commission (2025), A comprehensive EU toolbox for safe and sustainable e-commerce, COM/2025/37 final
	Report on Implementation of Article 4 of Regulation (EU) 2019/1020
	External Study on Implementation of Article 4 of Regulation (EU) 2019/1020
	Guidance on Application of Article 9 of Regulation (EU) 2019/1020
	Commission Staff Working Document Accompanying the document Proposal for a Regulation of the European Parliament and of the Council laying down rules and procedures for compliance with and enforcement of Union harmonisation legislation on products
	Evaluation of Union harmonisation legislation (2014) COM(2014)25 and SWD(2014)23)
	Evaluation of the market surveillance provisions of Regulation (EC) No 765/2008 (SWD(2017) 469
	Evaluation study of the regulation (EU) 1025/2012 on European standardisation
	Evaluation of the New Legislative Framework (NLF)
	Impact Assessment Report on establishing the Union Customs Code and the EU Customs Authority
	Impact Assessment accompanying the Proposal for a Regulation on general product safety
	Study to support the preparation of an evaluation of the General Product Safety Directive as well as of an impact assessment on its potential revision
	Impact assessment for the revision of the Construction Products Regulation
	Impact assessment of the Digital Services Act
	Report on application of Article 33 of Regulation (EU) 2022/2065 (DSA) and the interaction of that Regulation with other legal acts

4. TYPE	Title
	Interim evaluation of the Single Market Program (SWD (2025)172 final
	Commission staff working document, Impact assessment report, Proposal for a Regulation of the European Parliament and of the Council establishing the Union Customs Code and the European Union Customs Authority, and repealing Regulation (EU) No 952/2013
	Impact assessment for the revision of the Construction Products Regulation
	Evaluation study of directive 2014/33/EU (Lifts)
	COMMISSION STAFF WORKING DOCUMENT IMPACT ASSESSMENT REPORT Accompanying the document PROPOSAL FOR A REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the safety of toys and repealing Directive 2009/48/EC
	Proposal for a regulation of the European Parliament and of the Council on detergents and surfactants, amending Regulation (EU) 2019/1020 and repealing Regulation (EC) No 648/2004
	Evaluation of the EU legislation on pyrotechnic articles (Directive 2013/29/EU)
	Study on the evaluation of the Electromagnetic Compatibility Directive 2014/30/EU (EMCD)
	Impact assessment study on the revision of Directive 2006/42/EC on machinery
	European Commission: Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, Centre for Strategy and Evaluation Services (CSES), Whittle, M., Rampton, J., Marcolin, L. et al., *Evaluation study of directive 2014/33/EU – Lifts Directive – Final report*, Publications Office of the European Union, 202
	COMMISSION STAFF WORKING DOCUMENT IMPACT ASSESSMENT REPORT Accompanying the document PROPOSAL FOR A REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the safety of toys and repealing Directive 2009/48/EC
	COM(2023)217 - Proposal for a regulation of the European Parliament and of the Council on detergents and surfactants, amending Regulation (EU) 2019/1020 and repealing Regulation (EC) No 648/2004
	Report on controls on products entering the EU market with regard to product compliance in 2024
	Mapping the funding gaps in the market surveillance and customs enforcement. Perspective of the upcoming Multiannual Financial Framework
	Market surveillance for effective consumer protection in the EU (2023)
	New technologies and new digital solutions for improved safety of products on the internal market (2022)
	A Comparative Analysis of Member States' Customs Authorisation Procedures for the Entry of Products into the European Union (2022)
	First Biennial Summary Report on the Market Surveillance Activities of the EU Member States (2020-2022)
	CASP 2021, Annual report - Coordinated activities on the safety of products
	CASP 2021, Toys from non-EU webshops

4. TYPE	Title
	CASP 2022, Annual report - Coordinated activities on the safety of products
	CASP 2022, Online market surveillance
	CASP 2024, Annual report
	Cost Recuperation Article 15 report
	Costs of EUPCN Single market programme 25-27
	Pilot study on the definition and development of a system to collect and analyse sectoral data related to non-food products for one of the product sectors covered by Regulation 2019/1020
	Study on measuring product noncompliance for the sectors covered by Regulation (EU) 2019/1020
	JRC (2025) The EU market surveillance indicators: MSA activities, collaboration and results
	JRC Market Intelligence for surveillance - Evidence from the Toys and Ecodesign & Energy Labelling sectors
	JRC report on Joint actions
	Overview of national measures on penalties and sanctions adopted pursuant to Article 11.5 of Regulation (EU) 2020/740 of the EP and the Council on the labelling of tyres
	JAHARP (2024) Joint Action on Harmonised Products 2021 to support the
	implementation of Article 4 of Regulation (EU) 2019/1020
	Consumer Rights Protection Centre, (2025), E-commerce surveillance on online marketplaces, recent enforcement actions and future steps, shared
	JACOP (2024). Final JACOP 2024 Project Report.
	Safety Gate 2025 Results
	Safety Gate 2024 Results
Safety Gate Reports	Safety Gate 2023 Results
	Safety Gate 2022 Results
	Safety Gate 2021 Results
	Consumer Conditions Scoreboard, 2023 Edition
Eurobarometer	Survey of Consumers' Attitudes Towards Cross-border Trade and Consumer-related Issues 2023
	Toy industries of Europe (2025) The online toy safety gap, one year on
	Orgalim: Action plan for more effective market surveillance
Industry papers and reports	Euratex: Better Market Surveillance and Product Compliance for textile products for textile products
	Data insights: toy safety on online marketplaces
	EuroCommerce: EUROPEAN E-COMMERCE REPORT 2025, 2024, 2023, 2021

4. TYPE	Title
National market surveillance report	CCIA, News: Product Safety: Deal on New EU Rules Adds Complexity for Thousands of Online Marketplaces in Europe
	E-commerce key figures – 2025 FEVAD French federation of e-commerce
	Belgium: Activity Report 2023, 2022, 2021, 2020
	Czechia: Czech Trade Inspection Authority 2023, 2022, 2021, 2020
	Germany: Market surveillance statistics 2024, 2023, 2022
	Ireland: Competition and Consumer Protection Commission 2024, 2023, 2022, 2021
	Poland: Report on the functioning of the Market surveillance system in 2024, 2023, 2022, 2021
	Slovakia: Report on the state of labour protection for 2024, 2023, 2022, 2021
	Spain: UNE Market Surveillance Observatory Annual Report 2024, 2023, 2022, 2021
	Sweden: Enforcement of e-commerce articles 2024, 2022
	Control of toys and Halloween items 2022-2023; Toys 2021
	Inspection of fragrance oils and essential oils 2024
	Swedish Chemicals Agency (2025), Enforcement of e-commerce articles 2024.
National market surveillance strategies	Summaries of National Market Surveillance Strategies
	National Market Surveillance Strategies
	Germany E-Commerce Action Plan
	The Swedish Chemicals Agency Inspection Plan 2025
	Czech Consumer Policy Strategy 2021-2030
AdCo documents	Report on the 16th Joint cross-border EMC Market surveillance campaign
	Report on the 15th joint cross-border EMC market surveillance campaign on household appliances (2023)
	Report on the 13th joint cross-border EMC market surveillance campaign on microwave ovens (2021)
	Good Practice in Market Surveillance Activities related to Non-Food Consumer Products sold Online
	Agreements on Joint Activities
	AdCo RED reports
EUPCN Meetings	Agenda and minutes 2025, 2024, 2023, 2022, 2021
NGOs	PROSAFE: Joint/Concerted Actions Reports
Report from EU consumer organisations	The Federation of German Consumer Organisations (2026), Produktsicherheit auf Online Marktplätzen in der EU.
	BEUC, Harmful chemicals in everyday products - research and product tests by BEUC member organisations

4. TYPE	Title
	ECC-Net report 2023
	BEUC Presse release: New data on unsafe products should lead to regulatory enforcement and update, consumer organisations warn
Case law	Court of Justice of the European Union - C.J.E.U. - Judgment of the Court (Second Chamber) in Case nr. C-717/23 of 15 May 2025
	Administrative Court Ro 2023/11/0019
Academic papers	Hajnal Z. (2020) Current Challenges of European Market Surveillance regarding Products Sold Online
	Żywicka, A., & Kokocińska, K. (2023). The Structure of Network Administration on the Example of the Organization Market Surveillance Regarding Product Safety in the European Union. Teka Komisji Prawniczej PAN Oddział W Lublinie, 16(2), 427–441.
	Ruohonen, J. A review of product safety regulations in the European Union. Int. Cybersecur. Law Rev. 3, 345–366 (2022). https://doi.org/10.1365/s43439-022-00057-8
	The Fulfilment Service Provider in Product Safety and Liability: A Silver Bullet for the Enhancement of Safety and Compensation in E-Commerce, or a Leap of Faith?