RECOMMENDATIONS

to Enhance the Single Market

- Harmonise product regulation and policy
- Develop and Implement Harmonised Standards
- Mutual Recognition of standards
- Strengthen Market Surveillance and Enforcement
- Ensure Meaningful Consequences for non-compliance
- Increase Responsibility for Online Marketplaces
- Promote Cooperation
- Support Policies for Informed Decision-Making
- Promote Sustainability
- Foster Innovation
- Promote Open and Fair Competition
- Implement Digital Labelling

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APPLiA
Home Appliance Europe

Our 12 Key Actions

to Enhance the Single Market

APPLiA, the leading trade association representing home appliance manufacturers in Europe, has consistently championed the Single Market as a cornerstone of European integration and economic prosperity.

We view the Single Market as a vital tool for driving growth, sustainability, and global competitiveness within the European home appliance industry. The following recommendations are crucial to fully realise its potential:

1. Harmonise product regulation and policy

2. Develop and Implement Harmonised Standards

3. Mandate Mutual Recognition of Standards

4. Strengthen Market Surveillance and Enforcement

5. Ensure Meaningful Consequences for Non-Compliance

6. Increase Responsibility for Online Marketplaces

7. Promote Cooperation

8. Support Policies for Informed Decision-Making

9. Promote Sustainability

10. Foster Innovation

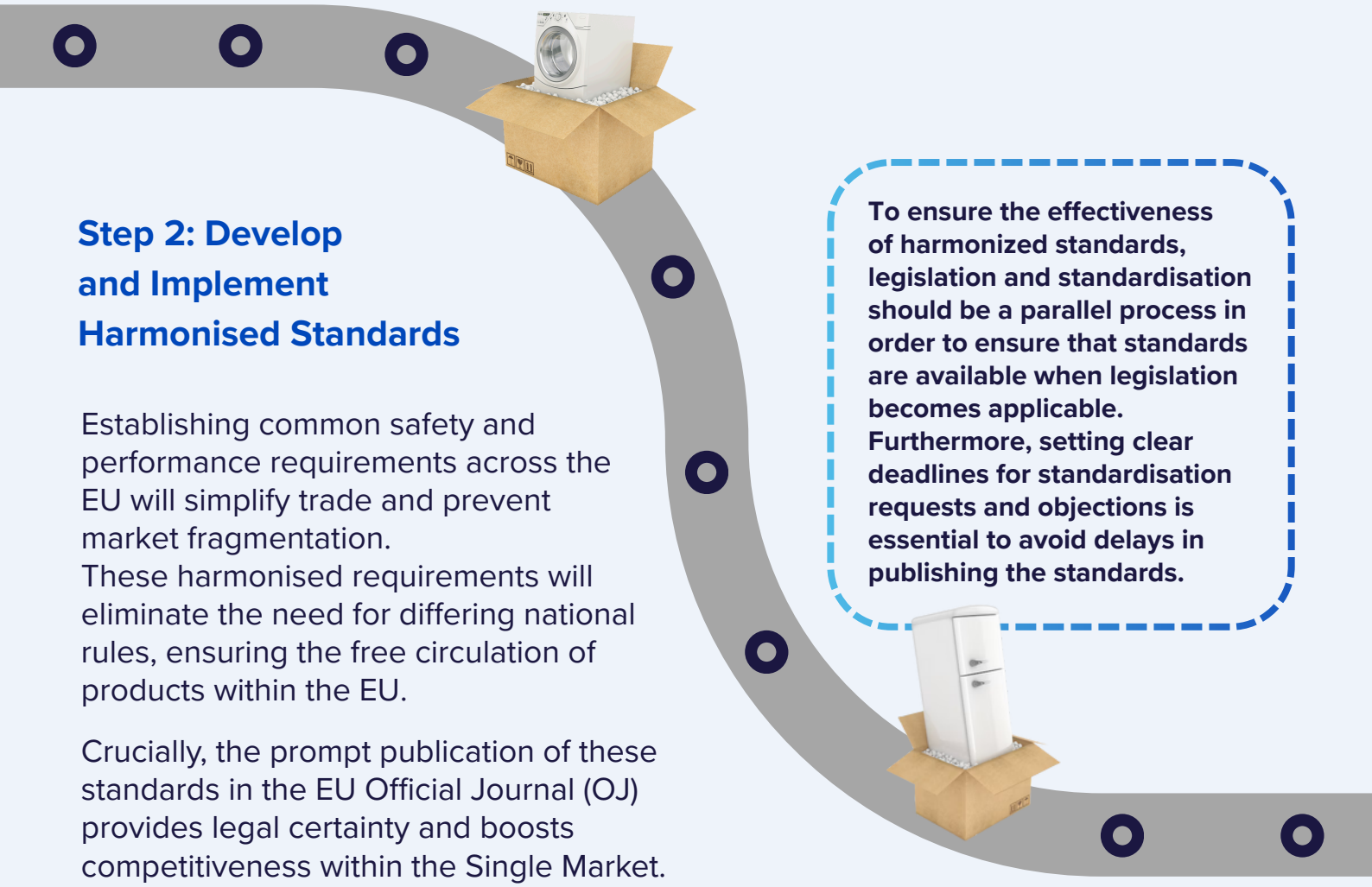
11. Promote Open and Fair Competition

12. Implement Digital labelling

Step 1: Harmonise product regulation and policy

The existence of differing regulations and standards across EU countries forces manufacturers to develop diverse product versions, thereby impeding the free movement of goods. This fragmentation is evident in the EU home appliance sector, where differing national sustainability rules over the past decade have inflated production costs and consumer prices, undermining the Single Market's effectiveness. Without harmonisation, this trend will continue to impede business growth and European economic integration.

All new EU legislation must include a thorough Single Market check with comprehensive impact and competitiveness assessments. This will ensure compliance and reduce burdens through clear, unified provisions.



Step 2: Develop and Implement Harmonised Standards

Establishing common safety and performance requirements across the EU will simplify trade and prevent market fragmentation.
These harmonised requirements will eliminate the need for differing national rules, ensuring the free circulation of products within the EU.

To ensure the effectiveness of harmonized standards, legislation and standardisation should be a parallel process in order to ensure that standards are available when legislation becomes applicable. Furthermore, setting clear deadlines for standardisation requests and objections is essential to avoid delays in publishing the standards.

Crucially, the prompt publication of these standards in the EU Official Journal (OJ) provides legal certainty and boosts competitiveness within the Single Market. However, significant delays in OJ publication impede this system, failing to meet market demands and policy priorities, particularly in key sectors like home appliances. This results in legal uncertainty for businesses and slows the adoption of new technologies, as manufacturers need timely OJ listing to legally demonstrate compliance.

Step 3: Mandate Mutual Recognition of Standards

Facilitate cross-border trade by mandating mutual recognition of standards and testing procedures within the EU. This will allow products certified in one member state to be marketed in others without the need for additional assessments, thereby minimising administrative and bureaucratic hurdles for businesses.

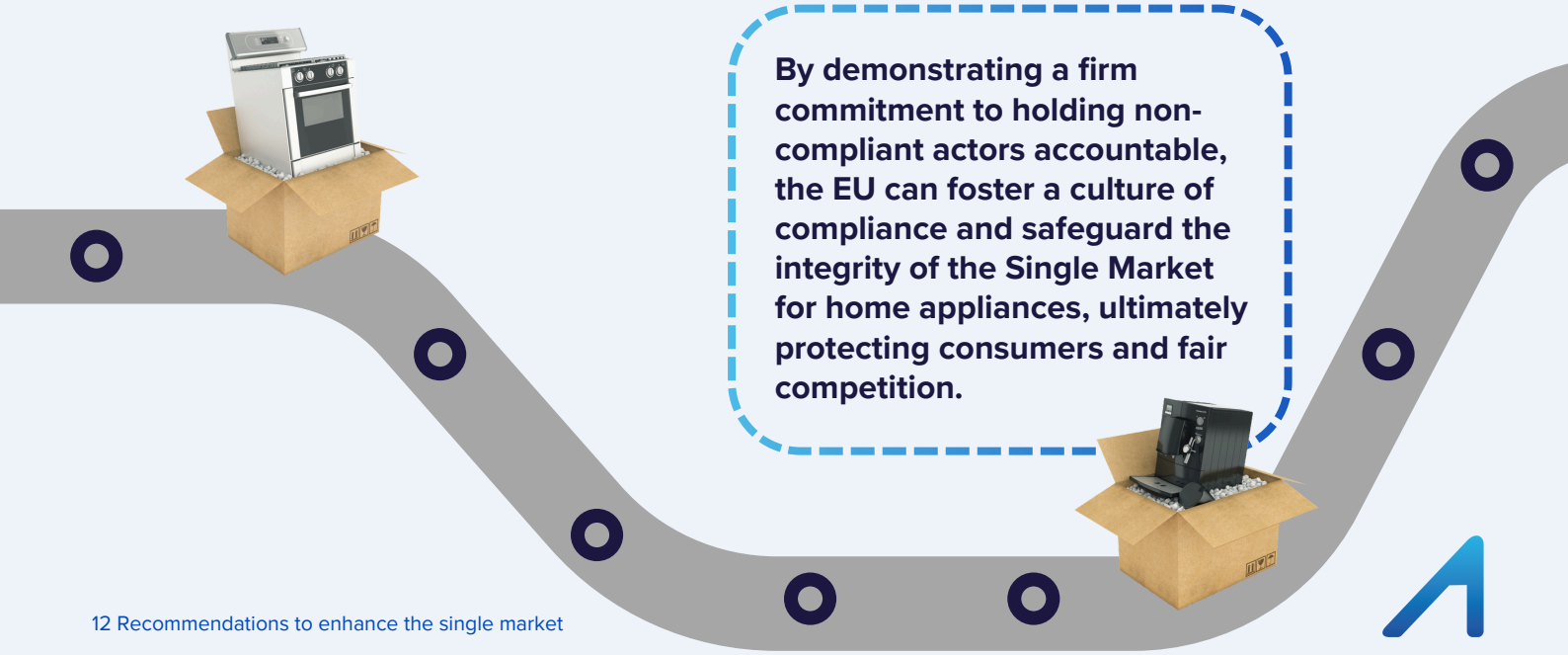
Step 4: Strengthen Market Surveillance and Enforcement

Ensure all market participants comply with Single Market rules by tackling counterfeiting and non-compliant products. This requires improved tools, especially for online sales, more effective external border controls, increased international cooperation, and support for business compliance, including addressing knowledge gaps.

Overcoming the fragmentation and resource limitations of national market surveillance authorities is crucial, alongside establishing a European Product Compliance Network to ensure consistent EU-wide enforcement, particularly in the growing online marketplace.

Step 5: Ensure Meaningful Consequences for Non-Compliance

Implement a robust framework of impactful penalties to deter companies from violating Single Market rules. To ensure consistent application and maximise their deterrent effect, these penalties must be clearly defined at the EU level and consistently enforced by national authorities.



By demonstrating a firm commitment to holding non-compliant actors accountable, the EU can foster a culture of compliance and safeguard the integrity of the Single Market for home appliances, ultimately protecting consumers and fair competition.

Step 6: Increase Responsibility for Online Marketplaces

Adopt stronger accountability measures for online marketplaces by recognising these as economic operators under EU law and addressing existing legislative loopholes that allow non-compliant and unsafe products to enter the European market. This also includes ensuring that online marketplaces comply with EU waste management obligations.

Step 7: Promote Cooperation

Foster collaboration among national authorities, customs officials, and industry stakeholders to address enforcement challenges, including those posed by online marketplaces.

Step 8: Support Policies for Informed Decision-Making

Advocate for policies that empower consumers to make informed choices, such as clear labeling, energy efficiency information, and access to reliable product reviews.

Step 9: Promote Sustainability

Support initiatives that drive energy efficiency, resource conservation, and circular economy principles within the home appliance sector. Europe should champion the creation of a Single Market for Waste and Secondary Materials, enabling easier reuse and high-quality, low-cost resource recovery across the EU.

Step 10: Foster Innovation

Support policies that promote Research and Development (R&D) and enhance the competitiveness of the European home appliance industry through a dynamic ecosystem. This ecosystem should cultivate cutting edge advancements, embrace digitalisation and develop the skilled workforce essential for the industry's future, ensuring Europe remains a leader in advanced manufacturing.

Step 11: Promote Open and Fair Competition

Support policies that encourage open markets and fair competition at the international level. All companies, regardless of their origin, must adhere to the same high standards for environment and consumer protection, thus creating a level playing field for all businesses operating in the European market and beyond.

Step 12: Implement Digital labelling

Manufacturers spend approximately €20 million each year producing paper-based energy labels, but only roughly 1 in 500 are displayed to consumers in stores.

Since this information is readily available online via the EPREL database, the paper label's value is limited after purchase. Mandating a paper label for every unit generates unnecessary cost and has a negative environmental impact.

To provide clear labeling for consumers while minimising burdens on businesses and preventing market fragmentation, paper information and labels should be restricted to essential uses.

Embracing digital labeling solutions, including digital energy labels, would further reduce fragmentation and eliminate significant paper waste. In this sense, the Digital Product Passport is only one of the options toward digital labelling.

About APPLiA

APPLiA is the leading trade association representing home appliance manufacturers in Europe. We advocate for a regulatory environment that encourages innovation, sustainability, and energy efficiency, enabling manufacturers to develop cutting-edge products for all European consumers. Together with our members and national associations, we develop industry policy positions on key legislative issues and help shape relevant EU policies.

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