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The European Product Act: delivering simplification, coherence and enforcement for the single market

The European Product Act (EPA) is a once-in-a-generation opportunity to strengthen the coherence, predictability and effectiveness of the EU's horizontal product framework. It cuts to the very core of the **freedom of movement of goods**, one of the four fundamental freedoms of the EU and a pillar of its single market. To succeed, the EPA must not add new layers of complexity, but instead **rebalance the system** by simplifying obligations, strengthening enforcement and ensuring consistent implementation across the EU single market.

For Europe's technology industries, the challenge is not a lack of rules, but **how those rules interact**, how they are enforced, and whether they reflect industrial realities. Orgalim has already developed specific positions on the revision of the New Legislative Frameworkⁱ, the Market Surveillance Regulationⁱⁱ and the Standardisation Regulationⁱⁱⁱ. This statement builds on the messages detailed in those papers and focuses on the benefits to be achieved by reviewing these legislations as a package.

1. Simplification must be structural, not compensatory

Orgalim's recent analysis^{iv} shows that, despite welcome simplification initiatives, companies continue to face a **net increase in the regulatory burden**, driven by cumulative costs, overlapping frameworks and misaligned timelines. This confirms that simplification cannot be achieved through isolated measures alone.

The EPA should tackle **duplication, inconsistencies and overlaps** across horizontal and sectoral product legislation, as well as between Union harmonisation legislation applying simultaneously, and **prevent new levels of complexity** from being introduced through future legislative initiatives. For example, the digitalisation of compliance information should be designed with a view to simplifying both compliance and enforcement – and not creating unnecessary complexities and costs.

This approach is fully aligned with the European Commission's 2026 Communication on Better Regulation and its Annex I^v, which rightly emphasises evidence-based policymaking, proportionality, assessment of cumulative impacts and implementation-focused regulation. The EPA must translate these principles into practice for the product framework.

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2. Companies need predictability and regulatory alignment

Manufacturing companies operate through long investment cycles, complex value chains and early design-stage compliance decisions. Regulatory uncertainty, fragmented or overlapping requirements, diverging national implementation and weak enforcement directly increase costs and discourage investment.

A well-designed EPA must recognise that:

- Compliance choices are taken early and are costly to reverse;
- Predictability and legal certainty are essential for innovation and competitiveness;

In addition, fragmentation (of enforcement, requirements, interpretations, etc.) undermines economies of scale and penalises compliant companies. When it comes to notification and evaluation of conformity assessment bodies or market surveillance, divergent national practices undermine the level playing field in the single market. For this reason, the EPA should promote greater coordination of regulatory alignment through guidance and peer exchange, while respecting national competences. Establishing an EU EPA body tasked with improving enforcement and safeguarding procedures could be a way to achieve further coordination.

Legislators should also consider that any changes to the existing rules for placing products on the EU market, even those which are necessary, will inevitably entail adjustments, learning and costs for all companies applying Union harmonisation legislation to adapt to the new rules. For this reason, the EPA should **focus on changes that are genuinely necessary**, deliver clear benefits, and make sense from a business compliance perspective.

3. Coherence and plausibility checks for efficient single market legislation

One of the most persistent weaknesses in the current system is the lack of alignment between different legislations, and legislation and standardisation timelines.

- **Introducing an EPA “coherence check”:** To ensure long term coherence, Orgalim supports the introduction of an EPA check for all future initiatives affecting product legislation. The check should assess alignment of the legislation with NLF principles, identify cumulative and cross-sectoral impacts and verify coherence of timelines and responsibilities. Such a safeguard would help embed Better Regulation principles upstream, prevent regulatory drift, and ensure that the EPA remains a living framework rather than a one-off exercise.
- **Introducing plausibility checks:** Reflecting Orgalim's long-standing position on setting transitional periods^{vi}, this check should require legislators to ensure that timelines are realistic, taking into account the time needed for standardisation development, the implementation of standards in products, and — where third-party certification applies — what is the available capacity of conformity assessment bodies, including whether additional Notified Bodies need to be accredited and notified in time. This check should be part of the EPA coherence check to be carried out before the proposal is tabled by the Commission, but it should also be considered by co-legislators when amending the proposal and adopting the legislation.

Conclusion

The European Product Act must be judged not by its ambition on paper, but by its ability to **simplify, align and enforce** in practice. To deliver for Europe's economy and society, the EPA must move from incremental fixes to systemic

simplification of internal market legislation. It should focus on strengthening enforcement rather than increasing obligations on compliant actors and on reinforcing trust in the NLF-based system and the single market.

Orgalim stands ready to continue working with EU institutions to ensure the European Product Act delivers a **coherent, enforceable and future-proof framework** that supports the free movement of goods, ensuring a high level of safety of products and a level playing field for businesses.

ⁱ See Orgalim's paper: "[Strengthening the New Legislative Framework \(NLF\) Orgalim's Priorities for the 2026 Revision](#)", 9 April 2026

ⁱⁱ See Orgalim's paper: "[The European Product Act: 10 proposals to upgrade market surveillance](#)", 4 February 2026

ⁱⁱⁱ See Orgalim's paper: "[From delay to delivery: making the development of harmonised European standards smarter & faster](#)", 17 December 2026

^{iv} See Orgalim's paper: "[EU efforts to simplify are still held back by cumulative costs](#)", April 2026

^v See Communication from the Commission "[A Simpler, Clearer and Better Enforced EU Rulebook](#)", 28 April 2026

^{vi} See Orgalim's paper "[Enhancing EU manufacturing competitiveness with a futureproof approach to placing products on the Single Market](#)", 26 June 2023 high-level

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