



Federation of the European
Sporting Goods Industry

FESI Position Paper

Strengthening the EU single market to support SMEs and enhance competitiveness

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The Federation of the European Sporting Goods Industry (FESI) recognises the vital role of the EU Single Market in ensuring Europe’s economic competitiveness and fostering innovation. However, the increasing fragmentation of national regulations—particularly on sustainability labelling regarding products and packaging as well as sorting instructions—threatens the Single Market’s cohesion and imposes a disproportionate burden on market operators, especially small and medium enterprises (SMEs).

SUMMARY

1. Key challenges

- Regulatory fragmentation
- Disproportionate Impact on SMEs
- Environmental and operational concerns

2. Recommendations

- EU Harmonisation of Regulations
- Strengthened EU oversight
- Support for SMEs
- Harmonised waste management systems

3. Conclusion

1. Key challenges

a. Regulatory fragmentation

Divergent national requirements, such as France’s Triman logo, Loi AGECE, and Eco-Score as well as Italy’s material-specific labeling, Spain’s sorting instructions and Bulgaria’s Tidy-man logo, create non-tariff barriers within the Single Market. These initiatives often contradict EU legislation, such as the upcoming Packaging and Packaging Waste Regulation (PPWR), Waste Framework Directive (WFD), the EU Ecodesign for Sustainable Products Regulation (ESPR), and the upcoming review of the Textile Labelling Regulation undermining the free movement of goods.

b. Disproportionate Impact on SMEs

SMEs face significant challenges adapting to these disparate requirements. Many lack the resources to redesign packaging for individual Member States, leading to higher costs, operational inefficiencies, and competitive disadvantages.

c. Environmental and operational concerns

Fragmented regulations result in increased packaging waste, additional transportation needs, and higher production and compliance costs. They also confuse consumers and impede circular economy goals by promoting non-harmonized recycling instructions.

2. Recommendations

To uphold the Single Market's integrity and improve conditions for SMEs, FESI recommends the following actions:

a. EU harmonisation of Regulations

Introduce a unified, EU-wide labeling system based on clear and universally recognized pictograms.

Promote digital solutions across labelling requirements, like QR codes and Digital Product Passports, to provide comprehensive product information without increasing packaging size or waste.

b. Strengthened EU oversight

Strengthen enforcement of existing mechanisms such as TRIS notification to review and halt national regulations that conflict with EU law, ensuring prevalence of existing and upcoming EU legislations such as PPWR and WFD.

Enhance enforcement tools to address disproportionate burdens imposed by Member States.

Use enforcement processes where Member States legislate in areas, where the EU has announced or already started legislative activity, ensuring companies do not have to undertake compliance efforts on the same topic twice within a short period of time.

c. Support for SMEs

Provide dedicated financial and technical assistance to help SMEs comply with harmonised EU standards.

Develop a centralised EU portal offering clear, accessible guidance on compliance with EU and national regulations.

d. Harmonised waste management systems

Standardise waste management practices across the EU, including harmonised bin colors and waste sorting categories.

Align national Extended Producer Responsibility (EPR) schemes to streamline compliance and reduce complexity for businesses.

3. Conclusion

To preserve the Single Market's fundamental principles, the EU must act decisively to prevent the proliferation of national regulations that hinder cross-border trade. A harmonized framework would reduce costs, simplify compliance, allow for scaling of sustainable solutions and create a level playing field, particularly for SMEs.

By promoting regulatory coherence and leveraging digital innovation, the EU can strengthen the Single Market, foster sustainability, and enhance Europe's global competitiveness.

Founded in 1960 FESI - the Federation of the European Sporting Goods Industry represents the interests of approximately 1.800 sporting goods manufacturers (85% of the European market) through its National member Sporting Goods Industry Federations and its directly affiliated companies. 70-75% of FESI's membership is made up of Small and Medium Sized Enterprises. In total, the European Sporting Goods Industry employs over 700.000 EU citizens and has an annual turnover of some 81 billion euro.

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