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ANNUAL PROGRESS REPORT

*Simplification,
Implementation
& Enforcement*

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1. Introduction

This report covers progress on simplification, implementation and enforcement made in the field of **trade, customs** and **economic security** as well as in the remit of the **Publications Office** of the European Union during the period 1 January – 31 July 2025.

As Commissioner for **Trade and Economic Security**, I am committed to use EU trade and customs policy instruments to maximise their contribution to the Union's core objectives, notably competitiveness, security and sustainability.

In the area of **EU trade and economic security policy** my services are focussed on negotiating and implementing the EU's vast network of preferential trade agreements. These support our geopolitical objectives in strengthening the EU's competitiveness and resilience by opening markets, diversifying our supply chains and securing access to strategic inputs. EU trade deals also simplify commercial transactions and give certainty and predictability to economic operators, 98% of which are SMEs. Work on autonomous tools also advanced, notably in the area of export controls (focussing on improving information exchanges with Member States) and in the field of FDI screening (focussing on improving the EU's legislative framework).

In the area of **customs**, I am working on an effective and modern customs system that can better support our EU Single Market by supporting EU competitiveness, notably by helping to protect citizens and supporting a level playing field for businesses.

Overall, my services are focused on simplifying implementation and strengthen enforcement throughout this Commission's term. This entails working towards a more effective and efficient legal framework, using innovative tools and making sure that upcoming reviews support implementation in the simplest and most-cost-efficient way, in dialogue with stakeholders.

Shaping EU trade, economic security and customs policy over the reporting period meant working hand in hand with Member States and stakeholders in pursuit of a coherent strategy that keeps markets open for European industry to grow, supports diversification and greater resilience while protecting European interests from unfair practices and reducing dependencies.

2. Executive Summary

Simplification

Simplification was a major focus for efforts in the area of **customs**. Firstly, my services closely collaborated with the Council and the European Parliament in the negotiations on the Commission's 2023 proposal for the **EU Customs Reform** to **simplify customs processes**, while enhancing the security and competitiveness of the European Union. Also, the **EU Single Window Environment for Customs** became operational in March 2025. It connects today the national customs systems with systems managing ten non-customs formalities. My services published a consolidated **[list of all valid Classification Regulations](#)**¹.

In the area of **trade and economic security**, regarding **simplification**, my services remain firmly committed to solid engagement with stakeholders to improve implementation and enforcement of international trade commitments. My services carried out a first **reality check** in the context of the Market Access Advisory Committee (MAAC) meeting of 4 June, in presence of the Chief Trade Enforcement Officer, with participation of 15 European business associations and representatives of EU Member States.

¹ This aligns past legislation with the updated combined nomenclature.

Furthermore, my services are preparing to **stress test the legislative instruments** in their remit, including with a view to identify potential for further simplification.

Implementation and enforcement

Implementation and enforcement were also being advanced over the reporting period. In the area of **customs**, the report highlights proactive Member States engagement and comprehensive compliance support. On 11 July, I hosted my first **implementation dialogue** on the application of the **rules of origin**. Moving forward, I will continue to invest in implementation of the customs legislation and fostering stakeholder dialogue in this domain.

In the area of **EU trade and economic security policy**, a number of concrete **initiatives to improve implementation** started over the reporting period (the evaluation of the EU **Conflict Minerals Regulation**) while others will be kicked off in the second half of 2025, notably the assessment of the effectiveness of the EU's **trade defence** measures and the evaluation of the EU's Regulation on **dual-use export controls**. Revisiting these instruments may also deliver information on how processes could be further simplified.

Enforcement remained high on the agenda as the EU used its enforcement toolbox in support of rules-based trade and to address unfair competition and protectionism, seeing **20 trade barriers fully or partially removed** over the reporting period in a variety of partner countries. The Commission also initiated 27 new trade defence investigations and for the first time used its powers under the EU **International Procurement Instrument** to tackle unfair practices in the Chinese medical devices' procurement market. To strengthen implementation in the area of economic security, interinstitutional negotiations on improving the EU's framework for **screening of foreign direct investment** (FDI) are in the final stages.

Under my political lead, the **Publications Office** has combined its expertise in providing access to EU law with its know-how on legal analysis and the trustworthy use of artificial intelligence (AI) to make two types of contributions to simplification and implementation: i) AI-facilitated analysis of the EU acquis; ii) developing a comprehensive digital ecosystem for managing the EU acquis.

3. Delivering Results: Key Measures

A. Simplification and stress tests

The Commission deployed several simplification initiatives in the areas covered by my portfolio.

In the area of **customs**, my services closely collaborated with the Council and the European Parliament in the negotiations on the Commission's 2023 proposal for the **EU Customs Reform** including defending the proposals to **simplify customs processes**. The customs reform will replace traditional declarations with a smarter, data-led approach to import supervision. It simplifies and rationalises customs reporting requirements for traders, for example by reducing the time needed to complete import processes, by providing one single EU customs data hub and by facilitating optimal data re-use among supply chain actors. The most trusted traders would benefit from 'green lanes' for faster clearance processes and audit-based controls. I would strongly encourage the negotiators to accelerate the negotiations to ensure that the envisaged simplification actually materialises in the near future for the stakeholders.

As part of these simplification efforts, in the area of digitalisation, the **EU Single Window Environment for Customs** became operational in March 2025. It connects, in its first phase, the national customs systems with systems managing ten non-customs formalities covering five policy areas: health, safety, agriculture, cultural heritage protection and environmental and climate protection. The Single Window enables customs and other competent authorities to exchange data in real time, improving cooperation, reducing administrative burdens and

allowing for faster and more efficient border procedures for economic operators. Also, the EU Centralised Clearance for Import (EU CCI) system became operational in 10 Member States in June 2025, increasing to 23 by the end of 2025, allowing customs authorities across the EU to work as a single entity for clearing goods brought into the Union. The system ensures the exchange of information between the connected Member States enabling joint responsibility for risk management, compliance with fiscal and non-fiscal requirements, and harmonised controls. A shorter control chain reduces administrative burdens for custom administrations, as well as traders.

My services also published a consolidated [list of all valid Classification Regulations](#) informing Member States and economic operators where to classify goods in the current Combined Nomenclature compared to previous versions. Correct and uniform tariff classification is key for ensuring a level-playing field for economic operators and respecting World Trade Organisation (WTO) commitments of the European Union (EU).

In the first half of 2025, the Commission also undertook preparatory work, including **extensive targeted stakeholder consultations** of customs authorities, companies and business associations, including my first implementation dialogue, for the assessment and stress-testing of the implementation of the **Rules of Origin**, which define the economic nationality of products and are a key element to determine the treatment of imported goods by customs. These consultations took place under an **external study** assessing how Rules of Origin have been working in practice over the years and whether they remain adequate in the current policy context. The study will feed into an overall evaluation of Rules of Origin by the Commission services. The external study is also connected with the review of the **Scheme for Autonomous Tariff Suspensions and Quotas** (ATSQ), including consultations with the relevant industries, national customs authorities and experts. Preliminary findings have flagged that, while the Scheme can be seen as offering a unique, effective² and flexible tariff tool, distinct from the regulatory, financial, and cooperative instruments commonly used in EU policy initiatives, it remains underutilized. A stronger coordination with the EU industrial strategy could improve the functioning and address some of the challenges currently faced by the Scheme.

The **empowerments for delegated and implementing acts in the entire customs acquis were screened** in 2025. More than 30 empowerments were identified and further assessed to determine which are to be prioritised and which could be deprioritised. Nearly all empowerments were considered priority because they are legally required and/or essential to achieving customs policy objectives. The few empowerments assessed as low priority will be examined in upcoming reviews.

In support of the work of the responsible DGs, the Publications Office conducted a mapping of delegated and implementing acts as concerns the home affairs, transport and communications networks, content and technology acquis.

In the area of **EU trade and economic security policy**, to support **simplification** during this Commission's term my services pro-actively reached out to stakeholders. DG TRADE carried out its first **reality check** in the context of the Market Access Advisory Committee (MAAC) meeting, in presence of the Chief Trade Enforcement Officer with participation of 15 European business associations and representatives of EU Member States. Among the key issues highlighted by the latter were the following: discriminatory treatment in **procurement, localisation requirements, burdensome regulatory practices, lack of recognition** of international standards and diminishing recognition of **CE marking**. The concrete suggestions made by Member States and stakeholders made at the reality check on 4 June include the following: maintaining an **open channel of communication** between DG TRADE and its stakeholders, providing more advice for business on **how to file a complaint** to the Single Entry Point and keeping Member States concerned informed; investing more in **international cooperation and regulatory dialogue**

² The found a positive macroeconomic impact of the Scheme for the EU economy with increases in employment (2.7%), investment (2.4%), and GDP (3.1%) over the long run. The Scheme has also been found to support the competitiveness of the EU industry reducing import costs (2.6%) and providing benefits for manufacturers (EUR 1.5 billion in uncollected duties in 2023).

between EU (including via EU Delegations) and non-EU national authorities, in particular in the sector of medical devices; launching an (annual/quarterly) **stakeholder forum** to review (regional) barriers by impact and have more sector specific discussions.

B. Implementation

In the area of **customs**, on 11 July, I hosted my first **implementation dialogue** on the application of the **Rules of Origin**. High-level representatives from over 30 individual businesses and business associations provided their views on current challenges for Rules of Origin and how to address them. The main takeaways are:

- the need to simplify and harmonise the rules and increase legal certainty,
- accelerate digitalisation,
- follow a sector-specific approach for the design and implementation of Rules of Origin,
- increase the supply chain traceability and
- enhance the coordination with the policy measures that are linked to the Rules of Origin.

Rules of Origin are regulated at the level of the EU but implemented by Member States' customs authorities. **Coordination and support for implementation are ensured** primarily via an Expert Group allowing the Commission and Member States to coordinate. This framework is complemented by exchanges with individual Member States' authorities. The Commission also provides Member States with guidance on the rules of origin in preferential arrangements: (1) general guidance covering a broad range of rules of origin topics; (2) guidance on specific areas; (3) guidance aimed at specific trade arrangements (e.g. Chile, New Zealand, UK). The Commission has also developed the Rules of Origin [Self-Assessment Tool \(ROSA\)](#), an interactive online resource designed to help operators evaluate their compliance with the preferential rules of origin for specific trade flows. On non-preferential origin, the Commission published guidance on non-preferential origin prepared with the support of Member States. Finally, the Commission regularly replies to specific questions raised by different stakeholders.

In the area of **EU trade and economic security policy** my services remained highly invested in **implementing the EU's vast network of 44 preferential trade agreements**. EU trade deals also mean simpler and more predictable customs procedures for EU exporters, 98% among them SMEs, and facilitated access to third country markets. Furthermore, my services continued to collaborate with other services across the Commission and with Member States to advance the implementation of the **European Economic Security Strategy**, and I will be presenting a **coherent economic security doctrine** by the end of the year.

A number of **concrete initiatives** aiming at **improving implementation** started during the reporting period or are about to start in the second half of the year. They are meant to examine the effectiveness of the legislative framework in light of past experiences, maximising outcomes for EU stakeholders, but may also identify potential for further simplification:

- In June 2025, interinstitutional negotiations on improving the EU's framework for **screening of foreign direct investment (FDI)** began in Strasbourg.
- In 2025, DG TRADE started preparatory works towards an assessment the effectiveness of the EU's **trade defence** measures. The assessment – entailing also an economic analysis by an external contractor, as well as input from stakeholders – is currently projected to be finalized early 2027.
- Over the reporting period, discussions continued with EU Member States on how to better cooperate on **export controls**. In April the Commission has released a Recommendation on how Member States can improve information exchange among themselves and with the European Commission on their planned national

controls, and how national lists of controls could be aligned with EU and multilateral standards. This autumn my services will start the process of evaluating the export control/dual use Regulation (EU) 2021/821. To inform this exercise, the Commission will rely on updated and more transparent reporting launched with the report issued on 30 January 2025 providing relevant information on authorisations, denials and prohibitions, as well as information on the administration and enforcement of such controls for 2022-2024; this report was updated by adding 2023 data on 4 July 2025.

- Preparatory work on a review of the **EU Conflict Minerals Regulation** started in the first half of 2025 and will intensify in the second half of the year, when DG TRADE will launch the tender procedure for an external study to accompany the ex-post evaluation. The external study will run in 2026 and will include targeted stakeholder consultations. The review (to be concluded in 2027) will also seek to understand how implementation could be made more effective and will identify concrete potential for easing burden on business.

Furthermore, I have also worked on **advancing the EU's bilateral agenda**. Among the achievements were the conclusion of political negotiations on comprehensive trade agreements with **Mexico**, **Mercosur** and with **Indonesia**), as well the launch of negotiations of trade agreements with **Malaysia** and the **United Arab Emirates** and of a clean trade and investment partnership with **South Africa**. With **Ukraine** and **Moldova**, we reached an agreement in principle to review and update the trade liberalisation provisions of the existing agreements to modernise our trade relationships with both partners. I have also been entrusted by President von der Leyen to carry out negotiations with the **United States** on a deal to bring stability and predictability to the EU-US relations. This led to the conclusion of a political agreement between President von der Leyen and President Trump on 27 July. The terms of the deal are reflected in a Joint Statement published on 21 August.

The **Publications Office** has contributed a useful tool by providing an **AI-facilitated analysis of the EU acquis**: it has supported the Secretariat-General and various Commission services with preparatory work for a range of simplification actions including Omnibus packages. This preparatory work has included a comprehensive mapping of reporting requirements in EU law as well as a number of more targeted actions. For example, to inform the spring 2025 Single Market strategy, the Office has mapped acts containing specific clauses that are recognised as hurdles to competitiveness (e.g., requirements to report on paper).

C. Enforcement

As regards [enforcement](#), my priority in the area of **customs** has been to ensure that all the Member States deliver on the digital implementation of the Union Customs Code. After close monitoring of the implementation process, the European Commission decided in May, June and July 2025 to open infringement procedures by sending letters of formal notice³ to:

- Austria, Belgium, Cyprus, the Czech Republic, Denmark, France, Greece, Portugal, Romania and Slovakia for failing to deploy one or several of the following systems⁴: the system for Temporary Storage for air transport, the National Import System and the Automated Export System. Member States were obliged to have these systems operating, including the migration of the relevant economic operators' systems, by 31 December 2023. The systems allow the declarations to be lodged electronically and are a crucial step in the supervision of goods entering the EU.

³ [Infringement cases in the EU – Infringement cases, transposition of directives and pre-infringement dialogue](#)

⁴ [May infringements package: key decisions](#) [June infringements package: key decisions](#), [July infringements package: key decisions](#)

- Austria, Belgium, Cyprus, the Czech Republic, Denmark, France, Ireland, Italy, Malta, Portugal, Romania, Slovakia, and Slovenia for failing to meet their obligations on customs data transmission⁵. Member States are required to transmit on a timely basis specific customs data to support uniform customs control, risk minimization, and compliance with Union provisions at external borders. These Member States continued to use outdated formats and to provide reduced datasets beyond the 31 December 2023 deadline. This non-compliance undermines the efficacy and reliability of EU customs operations.

As announced in the February 2025 Commission communication on the comprehensive EU toolbox for safe and sustainable e-commerce, the Commission has concretely supported implementation and enforcement of EU legislation by means of a **priority control area (PCA)** where it coordinates Member States's customs and market surveillance authorities to carry out customs controls on imports of products purchased online marketplaces. This action intends to ensure an effective level playing field at the EU border and will be used to reinforce the application of all the existing legal tools in a holistic manner, including the Market Surveillance Regulation and the Digital Service Act.

In the area of **EU trade and economic security policy**, the EU has used its **enforcement toolbox** in support of rules-based trade and to address unfair competition and protectionism.

- **20 trade barriers were fully or partially removed** over the reporting period in several partner countries, mostly as a result of bilateral engagement with the respective countries.
- At the same time, **dispute settlement** remains one important avenue for the EU's enforcement action. On 20 January 2025, the EU requested **dispute settlement consultations with China** at the WTO over Chinese court's practice of fixing worldwide royalty rates for standard essential patents without the consent of the patent holder (preventing EU companies from seizing EU courts to defend their IP rights).
- On 19 June the Commission for the first time used its powers under the **EU International Procurement Instrument** to tackle unfair practices in the Chinese medical devices' procurement market, excluding Chinese bidders in public procurement contracts for medical devices in the EU exceeding EUR 5 million.

For more details consult the Commission's **5th Annual Report on the Implementation and Enforcement of EU Trade Policy** to be published in the fourth quarter of 2025. The report will provide an account of results achieved, progress made and outstanding issues when implementing multilateral and bilateral trade commitments, supported by statistics and concrete examples.

Finally, the Commission's use of **trade defence instruments** over the reporting period helped ensure EU businesses can compete on fair terms as the Commission initiated 27 new investigations (i.e. 14 anti-dumping, 11 expiry reviews, one anti-circumvention investigation and one anti-subsidies re-opened). A targeted consultation was launched to help identify future measures to continue supporting the **EU steel sector**.

4. Way forward

In the coming 12 months, my services will continue implementation and simplification activities in the **customs** domain:

- collaborate intensively with the European Parliament and the Council to swiftly reach an agreement on the **Customs Reform** and the simplification measures enshrined in the proposal, preferably by the end of 2025,

⁵ [May infringements package: key decisions](#) [June infringements package: key decisions](#), [July infringements package: key decisions](#)

- integrate additional non-customs formalities within the **EU Customs Single Window framework**, to further simplify the administrative burden on economic operators and enhance the efficiency of customs processes.
- conclude an **evaluation of the EU rules of origin** covering their practical implementation over time and their fitness for purpose in light of the implementation of the policies they are meant to support.
- support a **uniform application of the rules of origin** across all Member States through a monitoring programme and improve the consistency and coherence of rules of origin implementation throughout the EU.
- conclude the **evaluation of the Scheme for Autonomous Tariff Suspensions and Quotas (ATSQ)**.
- prepare the **repeal** of some 15 **outdated classification regulations** for the end of 2025 and **amendment** of 10 more for adoption in 2026.
- assess how customs **special procedures** are implemented, whether the benefits of using them outweigh the costs of obtaining an authorisation for their use and how their implementation can be improved.

In the **area of EU trade and economic security policy** in regard to **simplification**, my services will examine the concrete **suggestions** by Member States and stakeholders made at the **reality check on 4 June**, with a view to enhance cooperation with national authorities and economic operators and offer additional simplification measures, where possible. My services, during this Commission's term, will also stress-test the trade-related legislative instruments.

In regard to **implementation and enforcement**:

- I will hold my second **implementation dialogue** in the **area of trade** and economic security in the second half of November. Informing this discussion will be the Commission's **5th Annual Report on the Implementation and Enforcement of EU Trade Policy**
- At the end of September (date tbc) DG TRADE will organise a **second reality check including on Trade Defence, the Foreign Subsidies Regulation** and related topics, together with DG COMP and DG GROW. My services will look at those instruments from the perspective of trade and economic security policy. More specifically, the invited business and other civil society organisations will have the opportunity to share their views on how they perceive those tools to work together and complement each other in practice. This discussion would then also feed into the new Economic Security Doctrine to be adopted later this year and the assessment of the effectiveness of Trade Defence measures.
- This autumn my services will start the process of evaluating Regulation (EU) 2021/821 relating to dual-use **export controls**, focusing on the effectiveness and efficiency of the current rules and how they work both for Member States' authorities, but also for business and other stakeholders. Moreover, on 14 November 2025, the Commission will host the Export Control Forum gathering export control experts from EU Member States and the business community which will also help inform the evaluation of the current EU framework on export controls.

For the **Publications Office**, all aspects of its simplification and implementation work will continue in 2026. In particular, the **Publications Office** is creating **a comprehensive digital ecosystem for managing the EU acquis**. The Office is working, in close cooperation with the Secretariat-General to develop a comprehensive Acquis Management Programme. Building on EUR-Lex as the single authoritative source of information on EU law, the programme aims to provide real-time access to up-to-date legal data, help reduce administrative burden, and support implementation and compliance. Through AI-based services to support information extraction which keep the human firmly in control, the programme is to help identify legal entities and relationships more effectively, classify and link these to a policy area and topic, provide an easy overview of certain clauses (e.g., requirements for legal compliance), and enable the early detection of possible inconsistencies, contradictions, overlaps, or duplication

in existing and draft legislation. The first iteration of a practical acquis management tool should become available in mid-2026.

2. Annex: examples

1. Rules of origin

The feedback received from participants to the 11 July Implementation Dialogue on Rules of Origin will feed into the evaluation referred to under point 4. These suggestions, which will be examined in detail, are meant to render the implementation of Rules of Origin easier, in particular from the point of view of economic operators. They include developing a harmonised approach across trading partners for preferential and non-preferential rules, accelerating digitalisation and standardisation and strengthening sector-specific guidance and support for SMEs.

2. EU Customs Single Window

The Single Window enables the automated exchange of data between customs and non-customs authorities, facilitating real-time verification of the relevant documents required for border clearance. For formalities integrated into this framework, such as the Common Health Entry Documents (CHEDs), relevant information is retrieved directly from the issuing authority and transmitted to customs without any manual intervention from the economic operator. In the case of CHEDs, customs authorities must cooperate with veterinary, phytosanitary or health authorities to ensure that relevant standards are met for goods entering the EU market. Instead of multiple separate documentary controls, the required supporting documents are automatically verified through the interconnection of customs and non-customs systems in real time. The automated and real-time exchange between authorities brings tangible benefits for economic operators, reducing administrative burdens and clearance times and paving the way for long-term simplification in cross-border trade.

3. Enforcement of international commitments in the high tech sector

On 22 April 2025 the EU also appealed within the Multi-Party Interim Appeal Arbitration Agreement (MPIA) in case DS611 ([China – Anti-Suit Injunctions](#)). On 21 July, the WTO appeal Arbitrator overruled important findings of the initial panel and agreed with the EU that concluded that China's anti-suit injunction policy is inconsistent with the TRIPS Agreement. This is an important win for **EU-based high-tech companies** whose research outcomes were undermined by the Chinese policies in questions. It ensures European companies can continue to defend their intellectual property in European courts.

4. Access2Markets upgrades for business

The [Access2Markets platform](#) has attracted over 12 million visitors since its launch in October 2020 and nearly 2 million visitors over the reporting period. Participants in the reality check of 4 June (*see point B implementation*) underlined the usefulness of the Access2Markets platform, including the [EU Single Entry Point](#) (SEP) for complaints and the trade barriers section. Upgrades in 2025 have made the platform even more streamlined, user-friendly, and effective for European SMEs looking to expand internationally, such as the inclusion of additional statistics for services and the expansion of "[My Trade Assistant for Services and Investment](#)" tool with information for Brazil, India, Mexico, and South Africa, in addition to the eight countries already covered. 10 more countries have been added to the [Access2Procurement](#) (Switzerland, Norway, Iceland, Liechtenstein, Albania, Bosnia and Herzegovina, Serbia, North Macedonia, Kosovo, and Montenegro). Furthermore, following the results of the user survey conducted between March and June, the Access2Markets platform is undergoing a redesign to serve users even better, offer a more intuitive experience, and make navigation simpler.

5. AI-facilitated analysis of the acquis to support competitiveness

As part of its work on the AI-facilitated analysis of the acquis, the Publications Office has worked, among others, with the Directorate General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW) to identify hurdles blocking competitiveness, financial market integration and free movement of capital. In particular, it has identified acts that still allow for or even mandate reporting on paper, acts that set certain data retention standards and acts that refer to standards, in particular harmonised standards.

The Office will also soon start working with DG GROW and its network of advisors (Enterprise Europe Network) to lay the groundwork for making sure that external stakeholders can benefit from the collective wealth of data on the EU acquis. For example, businesses contemplating new ventures will be able to enquire on the set of requirements for legal compliance and see an overview of all data to provide, reporting dates and recipients.

6. Legal and public procurement data spaces

The Publications Office has been working on the development of a [legal data space](#) and of the [public procurement data space](#) to provide single entry-points to open data and citizen-centric reuse services, and to facilitate the reuse of open data by economic players for developing new or enhanced products and services. The benefits of such data spaces are multifaceted: i) they allow citizens to easily retrieve official information about their rights and obligations across the EU when they exercise the four fundamental freedoms; ii) they enable businesses to innovate, grow and access new markets thanks to an easier understanding of different national legal rules; iii) they contribute to a better mutual understanding across national administrations and courts for a better implementation and application of EU law and other Member State laws.

7. Access to business opportunities for small businesses and entrepreneurs

The Publications Office has made available a practical [tool](#) for small businesses and entrepreneurs looking for business opportunities. The tool brings together in a simple manner, in all EU languages, crucial information on European public procurement calls for tenders as published in the official [Tenders Electronic Daily](#). This tool helps level the playing field and broaden access to EU-wide markets and beyond, helping companies grow, create jobs and serve their communities.