

EU Survey for Stakeholders on Gold-plating

Fields marked with * are mandatory.

Introduction

Dear business representative,

Thank you for helping us remove unnecessary barriers from the EU's single market, so that your business operations are smoother and more effective. The focus of this exercise is to **Identify by the 15th of September 2026 examples of cases where EU businesses face gold-plating.**

According to The Communication [A Simpler, Clearer and Better Enforced EU Rulebook](#) adopted in April 2026, gold-plating occurs “*where a Member State, when transposing or implementing EU law in a given policy area, introduces a wider scope, stricter rules or obligations that go beyond the requirements set by the EU legal act. Creating more burdensome procedures than what is necessary to implement the EU law can also be considered gold-plating.*”

Therefore, gold-plating involves **exceeding EU legislation requirements or administrative practices during national law transposition and implementation**, adding unnecessary complexity, costs, and burdens to stakeholders without necessarily infringing EU law (often referred to as over-implementation).

Gold-plating in Member States can take different forms, such as:

- *More stringent norms* (higher standards, expanded scope of application of EU act, language and safety demands, reporting obligations, additional labelling requirements, thresholds, removal of exemptions, etc);
- *Administrative procedures* (authorisation, notification or permitting requirements, parallel or multiple procedures at different levels (local, regional, national), new document obligations);
- *Interpretative guidance* (stringent or divergent legal interpretations of EU definitions);
- *Enforcement measures* (stringent penalties, burdensome information injunctions, frequent inspections).

When answering this EU survey, please be as specific as possible in **Identifying the barriers that you encounter when marketing your products and providing your services across the EU market.** This might include information about the product/service, target countries/regions, and differences in how EU rules are implemented at national or local level that complicate your business operations, making procedures

longer, more complex or more costly.

Collecting your views and experience is important to reduce unnecessary burdens and costs that impact you when operating in the Single Market. Thank you in advance for **providing your answer by 15 September 2026**. It will contribute to our [Simplification](#) agenda, including the development of a Toolkit for Member States to help them prevent gold-plating practices.

For further clarification, please contact GROW-SIMPLIFICATION@ec.europa.eu, in DG GROW, Unit B1 Planning and Simplification.

Privacy Statement

[GROW_B1_Privacy_Statement_for_gold-plating_survey_DPR-EC-01011_.pdf](#)

About Your Business

Please tell us more about your business and sector of your activity.

*** 1. Your Organisation**

*** 2. Company size**

- ☐ **Micro**-company has up to 10 employees and a turnover or balance sheet total of up to €2 million
- ☐ **Small** company has up to 50 employees and a turnover or balance sheet total of up to €10 million
- ☐ **Medium**-sized company has up to 250 employees, a turnover of up to €50 million or a balance sheet total of up to €43 million;
- ☐ **Large** company (250 or more employees)

*** 3. Sector of operations / your industrial ecosystem**

- ☐ Aerospace & Defence
- ☐ Agri-food
- ☐ Construction
- ☐ Creative & cultural industries
- ☐ Digital
- ☐ Energy intensive industries
- ☐ Health and care
- ☐ Electronics
- ☐ Mobility, transport, automotive
- ☐ Proximity & Social economy
- ☐ Renewable energy
- ☐ Retail
- ☐ Textile

* 4. **Indicate your main product / service** so we understand better in which subsector you are part of.

* 5. **Main Member State** of your business operations. *Multiple choice is possible if you wish to flag cross-border nature of your activity.*

- ☐ Austria
- ☐ Belgium
- ☐ Bulgaria
- ☐ Croatia
- ☐ Cyprus
- ☐ Czechia
- ☐ Denmark
- ☐ Estonia
- ☐ Finland
- ☐ France
- ☐ Germany
- ☐ Greece
- ☐ Hungary
- ☐ Ireland
- ☐ Italy
- ☐ Latvia
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☐ Netherlands
- ☐ Poland
- ☐ Portugal
- ☐ Romania
- ☐ Slovak Republic
- ☐ Slovenia
- ☐ Spain
- ☐ Sweden
- ☐ Other

6. May we **contact you** for further details, if needed?

- ☐ YES
- ☐ NO

DESCRIPTION OF IDENTIFIED GOLD-PLATING PRACTICES

7. **Have you encountered gold-plating** practices in your area of operations?

- ☐ YES
- ☐ NO

* 8. Please identify which **category(ies)** of gold-plating have you encountered:

- ☐ *More stringent norms*: higher standards, e.g. supplementary substantive rules (on the characteristics of the product and/or service provision in question) beyond those required by an EU Act
- ☐ *More stringent norms*: expanded scope of application of EU legislation as transposed or implemented at national, regional or local level
- ☐ *More stringent norms*: stricter deadlines
- ☐ *More stringent norms*: additional language and safety demands
- ☐ *More stringent norms*: reporting obligations
- ☐ *More stringent norms*: additional labelling requirements
- ☐ *More stringent norms*: authorisation, notification, registration or permitting requirements not required by an EU Act
- ☐ *More stringent norms*: different thresholds (size, turnover, emissions, etc.)
- ☐ *More stringent norms*: removal of exemptions allowed by the EU Act
- ☐ *Administrative procedures*: new document obligations incl. authorisations, notifications, information requests
- ☐ *Administrative procedures*: parallel or multiple procedures at different levels (local, regional, national)
- ☐ *Interpretative guidance*: stringent or divergent legal interpretations of EU definitions;
- ☐ *Enforcement measures*: stricter penalties, burdensome information injunctions, frequent inspections
- ☐ *Other*

* 9. Identify the **sector(s)**, for which this gold-plating case is relevant

- ☐ Aerospace & Defence
- ☐ Agri-food
- ☐ Construction
- ☐ Creative & cultural industries
- ☐ Digital
- ☐ Energy intensive industries
- ☐ Health and care
- ☐ Electronics
- ☐ Mobility, transport, automotive
- ☐ Proximity & Social economy
- ☐ Renewable energy
- ☐ Retail
- ☐ Textile
- ☐ Tourism

* 10. Identify the **product or service** concerned by this gold-plating case

* 11. Identify the **Member State(s) where you have encountered this gold-plating practice**

- ☐ Austria
- ☐ Belgium
- ☐ Bulgaria
- ☐ Croatia
- ☐ Cyprus
- ☐ Czechia
- ☐ Denmark
- ☐ Estonia
- ☐ Finland
- ☐ France
- ☐ Germany
- ☐ Greece
- ☐ Hungary
- ☐ Ireland
- ☐ Italy
- ☐ Latvia
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☐ Netherlands
- ☐ Poland
- ☐ Portugal
- ☐ Romania
- ☐ Slovak Republic
- ☐ Slovenia
- ☐ Spain
- ☐ Sweden

12. Identify the **applicable EU legal act(s), national measure(s) or administrative practice(s)** impacted by gold-plating; and if possible, indicate which authority is responsible for adopting the measure.

13. Estimate the **intensity and frequency** at which this gold-plating problem burdens your business.

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- * 14. **Describe** additional information about this gold-plating practice (nature of the gold-plating burden, frequency of dealing with it, impact on your operations, geography, timeline), which you encounter when operating in the EU.

15. Please **share if you have a more detailed description of the problem available**, such as a position paper, legal analysis or press release.

IMPACT & COST OF GOLD-PLATING ON YOUR BUSINESS

Help us understand the qualitative and quantitative impact that the above-mentioned gold-plating practice has on your business growth, bottom-line or expansion opportunities. If possible, please quantify the burden including direct and indirect costs. Even a rough estimate is valuable; exact figures are not required as long as some justification is provided. For more details about the typology of costs, refer to [Better Regulation Toolbox, p. 507](#)

16. **How significant is the burden** on your business?

- ☐ Minor inconvenience
- ☐ Low burden
- ☐ Moderate burden
- ☐ Significant burden
- ☐ Major barrier to market entry or business operations

17. Which type(s) of **DIRECT costs** have you incurred as a result of this/these gold-plating practice(s)?

- ☐ **Adjustment costs: investments and expenses** to adjust your activity to the gold-plated requirements
- ☐ **Administrative costs** to comply with administrative obligations
- ☐ **Regulatory charges**: including fees, levies, taxes, etc.
- ☐ **Enforcement costs** associated with implementation of the rules (such as monitoring, inspections and adjudication/litigation)
- ☐ **Hassle costs** from unnecessary waiting time, delays, redundant legal provisions.
- ☐ Other

18. Please specify **any other additional direct cost** incurred.

19. In a typical month, **what percentage of employees' time, if any, is spent on dealing with those additional requirements** imposed by national regulation or administrative practices?

- * 20. **Specify and/or quantify (in EUR) the above-mentioned costs** of gold-plating: e.g. as extra expense per unit of sales, annual operating expense, compliance costs (e.g. for legal analyses), or other.

21. Which **type(s) of INDIRECT costs** have you incurred as a result of this/these gold-plating practice(s)?

- ☐ **Indirect compliance** costs related to the fact that stakeholders have to comply with legislation
- ☐ **Offsetting/substitution** costs related to reliance on alternative sources of supply
- ☐ **Transaction costs of renegotiating contracts**
- ☐ **Opportunity costs** of foregone alternative investments
- ☐ **Negative impacts on market functioning:** reduced competition or market access, reduced innovation or investment.
- ☐ Other

22. Please specify any **other additional indirect cost** incurred.

- * 23. **Specify if/how the above-mentioned gold-plating practices negatively impacts your business, including indirect costs in EUR**, e.g. due to delays in market entry, loss of contracts / opportunities, reduced competitiveness, or impact on your decision to enter / remain in a particular market?

SOLUTIONS

This section aims to understand whether/how you have already tried addressing the issue and what the result was.

24. Which **channel / authority** did you approach for remedy?

- ☐ National, regional or local public authority
- ☐ Courts
- ☐ EU reporting tools, such as the Single Market Barrier Tracker or Solvit
- ☐ Industry association or public affairs representative
- ☐ EU Business Support Network (e.g. EEN or industry cluster)
- ☐ Public communication including social media
- ☐ Other
- ☐ None

25. **How was the request addressed?** Which organisation helped you address it and what kind of action / solution have they offered / delivered?

Your answer will help us identify better / worse practices for eliminating gold-plating in various Member States.

26. What other **action(s) would you welcome** so that the problem is solved?

27. Have you identified **Member States that have implemented the same EU legislation in a less burdensome way**?

If so, please specify the Member State/s and main differences observed.

Contact

[Contact Form](#)