

Right to Stay Strategy – Your Region, Your Future – Call for Evidence - EuroCommerce response

EXECUTIVE SUMMARY

Without a viable retail and wholesale presence, quality of life declines and depopulation accelerates, undermining the right to stay.

Retail and wholesale are indispensable to enabling citizens' **right to stay in the place they call home**. As Europe's largest private employer, with **26 million jobs across 5 million companies (over 99% SMEs)**, the sector provides economic activity across the whole of the EU, including rural and remote areas, or those with geographical particularities, economic decline or limited opportunities.

Retail and wholesale are part of the social infrastructure, provide a gateway to essential services that helps maintain a reliable standard of living, including in the time of crisis, across the EU. It is a source of local employment and an anchor in the community.

EuroCommerce therefore calls for a **place-based, investment-driven strategy** that fully recognises retail and wholesale as **core infrastructure for regional resilience and attractiveness**, to give EU citizens the freedom to stay in the community of their choice. Retail and wholesale needs to be seen as a key partner.

KEY RECOMMENDATIONS

Retail and wholesale provide a reason to stay.

A competitive retail and wholesale sector supports local economies and employment, through first and stable jobs, flexible working, acting as a platform for entrepreneurship and innovation, and creating local value chains, supporting SMEs and regional producers. Its presence strengthens social cohesion and community life, providing proximity, contributing to preparedness, urban circularity including tackling food waste, and to towns and villages decarbonisation and energy efficiency efforts.

The factors that affect the ability for people and businesses to remain in a certain place include lack of infrastructure, regulatory fragmentation and rigidity, and declining demand and viability risks.

From a retail and wholesale perspective, public policies to support prosperity and help make EU regions remain an attractive place should focus on:

- Improving infrastructure and connectivity.
- Placing retail and wholesale at the core of the Right to Stay Strategy.

- Strengthening multilevel governance and stakeholder involvement (public-private cooperation).
- Launching an EU programme for revitalising rural, remote, and small urban areas.
- Ensuring agile and proportionate planning and regulatory frameworks.

What will enable the competitiveness of retail and wholesale, so it remains viable and can anchor the right to stay:

- Safeguarding employment.
- Restore the level playing field in retail to address growing concerns over non-compliant third-country traders and marketplaces.
- Simplifying regulation and ensuring rules are proportionate and implementable.
- Supporting retail and wholesale's competitiveness by taking action on territorial supply constraints, focusing the revision of the Unfair Trading Practices Directive on small farmers and SME processors, ensuring the role of retail and wholesale is recognised in the Circular Economy Act, and tackling the imbalance of power with card schemes.

FULL POSITION

RETAIL AND WHOLESALER ENABLE THE RIGHT TO STAY

The Commission has recognised retail and wholesaler's contribution to the right to stay in its Communication, 'A long-term Vision for the EU's rural areas – Towards stronger, connected, resilient and prosperous rural areas by 2040': *'Retail, doctors, pharmacies, banks, post offices, public transport, childcare facilities and schools are essential to rural life and jobs, as well as to ensure no-one and no place is left behind. The absence of these services can quickly lead to feelings of remoteness and social exclusion.'*¹. This is supported by other studies².

Retail and wholesaler are crucial for urban and rural local communities as they bring life, local employment, local revenues, proximity, personalised services, choice and availability, and the future potential to play a role in more sustainable practices, for example, as new business models develop or shops develop their own facilities to collect, sort and recycle products. The variety in retail and wholesaler³ is broad and involves many different skills, products, experiences, and operations.

If our sector keeps shrinking, as it did in previous years, it will be forced to recede from smaller towns, rural areas or inner cities, increasing polarisation and reducing opportunities and quality of life in these areas. **The lack of economic opportunities and access to services can compel people to move away, particularly in remote and declining regions.**

A competitive retail and wholesaler sector can address these challenges by:

¹ [EUR-Lex - 52021DC0345 - EN - EUR-Lex](#)

² For example, <https://www.dnws.nl/wp-content/uploads/2025/01/De-moderne-agora-januari-2025.pdf> and <https://www.dnws.nl/wp-content/uploads/2026/01/Publicatie-De-Moderne-Agora-Gedeeld-Verlangens-versie-30-12-2025.pdf>

³ [Support Europe's Wholesalers - EuroCommerce](#)

1. Supporting local economies and employment

Retail and wholesale supports local economies and employment by:

- Providing **first and stable jobs**, particularly for youth, women and low-skilled workers, as well as **opportunities for career development** and **flexible working**.
- Acting as a **platform for entrepreneurship and innovation**.
- Creating **local value chains**, supporting SMEs and regional producers.

Providing first and stable jobs and opportunities for career development

Retail and wholesale has a highly diverse workforce and offers career opportunities to people from a wide range of backgrounds, including members of minority groups, residents of rural areas, those with learning difficulties or disabled people, and those looking for part-time work. The retail and wholesale sector is also a leading provider of apprenticeships in nearly every EU country. These are key entry points for young people into quality jobs.⁴

Retailers and wholesalers are increasingly dedicated to fostering a safe and thriving work environment. Their commitment extends beyond mere compliance with regulations to actively promoting the well-being of their employees. This includes ensuring lifelong employment opportunities, supporting career progression initiatives, combating all forms of discrimination, and fostering a culture of inclusivity and diversity as well as healthy workplaces.

Retail and wholesale offers a wide variety of job opportunities, from entry-level roles on the shop or warehouse floor⁵ to advanced careers in areas such as marketing, data science, analytics, digital innovation and sustainability roles. The sector also has a strong track record in building up the skills employees need to succeed in the workplace and career advancement opportunities.⁶ This includes through apprenticeships, vocational education training, skills initiatives, and collective agreements.⁷

As the EU's largest private employer, the retail and wholesale sector provides opportunities for individuals from marginalised communities, including migrants, refugees, and minorities.⁸ **Women**

⁴ See for example, [European Alliance for Apprenticeships - Employment, Social Affairs and Inclusion](#). Recognised in the joint statement of EuroCommerce and UNI Europa ahead of the Quality Jobs Roadmap - [20250625-joint-response-uni-europa-quality-jobs-roadmap.pdf](#)

⁵ For example, in the Netherlands, approximately one third (34%) of retail workers are students or pupils, for whom retail often provides the first work experience and entry into social networks. 397,000 retail workers are under the age of 24.

⁶ For example, the Skills4Retail – EU funded project – is offering targeted training for the retail sector in sustainability and digitalisation (see: [About us | Shaping the Future of Retail | Skill4Retail](#)). EuroCommerce is also, together with UNI Europa, coordinating the Large Skills Partnership for Retail, part of the European Commission's Pact for Skills initiative (see: [Social partners in retail and wholesale join forces in Skills Partnership - UNI Europa](#)). Initiatives like Estudar+ help employees with low levels of formal schooling complete their basic and secondary education – directly at the workplace and during working hours (See: <https://youtu.be/ZaluCEgilAM?si=VrtdUXpT4GsN9Rgc> and [European Commerce Awards 2025 - EuroCommerce](#)).

⁷ See Annex 3.C Cases (pages 153-168), [OECD, 'Local Retail, Global Trends'](#) and [Human Capital Agenda - Retailland](#).

⁸ Many people may still face barriers to entering and thriving in the workforce including refugees and immigrants, younger and older workers and those currently inactive in the labour market. The UNI Europa Commerce and EuroCommerce joint initiative – The “D4I – DIALOGUE4INCLUSION – Empowering Inclusive Commerce through Social Dialogue” supported by the European Commission, aims to remove barriers and create real opportunities through awareness-raising, knowledge-sharing and capacity building concentrating on three key groups, younger and older workers, inactive population and migrants, immigrants to ensure targeted and effective solutions. See:

make up 62% of the retail workforce, highlighting their strong contribution not only as employees but also as business leaders.

Example:

- In rural regions in the Netherlands, particularly shrinking labour market areas (such as Friesland, Drenthe, Zeeland and parts of Limburg), retail employment is more locally embedded and more stable than many other sectors. Retail absorbs local labour supply and reduces the need for long commuting distances, which are particularly problematic in sparsely populated areas.

Providing opportunities for flexible working

Retailers and wholesalers provide flexible job opportunities, with about a third (32%) of workers in part-time roles. This flexibility can play a pivotal role in supporting women's financial independence and 62% of the workforce are women. When women can access flexible work arrangements, they are more likely to remain in the workforce, manage caregiving responsibilities, and pursue career advancement.

The flexibility can also meet the evolving needs of a new generation of young workers. For instance, in Finland, retail is the largest employer of people under 25, with many of these workers in part-time roles. The primary reason is their desire to pursue education while gaining work experience.

Young workers particularly value flexibility, often preferring to take on additional shifts as their schedules allow, rather than committing to fixed hours. Numerous Collective Agreements already regulate Sunday and shift work, ensuring fair pay and adequate rest.

Acting as a platform for entrepreneurship and innovation.

99% of the retail and wholesale sector is composed of SMEs. 1 in 5 of the EU's SMEs are active in retail and wholesale. They provide around 17 million jobs and contribute €830 billion per year to the EU's GDP. SME retailers and wholesalers come in many forms, but all are independent entrepreneurs operating at their own risk. They can employ 1 to 250 people and can operate on their own or work together with a purchasing organisation/cooperative or a franchise formula. Such group-affiliation supports competitiveness and digital adoption⁹, offering successful business opportunities for entrepreneurs. This support that ensures viable businesses should be valued and fostered.

Retail and wholesale is one of the main entry points into entrepreneurship, with OECD data¹⁰ showing that one in five newly created businesses in the EU operates in wholesale and retail trade.

Retail and wholesale stands out as one of the most inclusive entrepreneurial ecosystems in Europe, with a higher share of women-led businesses than many other private sectors. Today, **28% of employers in the EU are women**, and **1 in 5 women entrepreneurs are active in retail and wholesale**. They play a key role in sustaining economic activity in rural and remote areas, offering accessible pathways to business ownership through independent retailing, family businesses, franchising and direct selling models.

[Empowering Inclusive Commerce through Social Dialogue - UNI Europa](#) and [Inclusive Commerce through social dialogue](#).

⁹ "As group-affiliated retailers benefit from the shared trademarks, platforms or business infrastructure, decisions on web technology adoption are likely made at the group level rather than by the individual firm... This pattern suggests that affiliation with a retail group provides access to shared resources that support the adoption and use of online tools." Page 70, [Local Retail, Global Trends \(EN\)](#)

¹⁰ [Local Retail, Global Trends | OECD](#)

It is equally important for generational renewal, with wholesale and retail accounting for 13.7% of youth self-employment activities in Europe and the EU counting more than 2 million young entrepreneurs aged 20–29. By supporting business creation, succession and generational renewal, retail and wholesale help preserve local services, create employment opportunities and strengthen the long-term viability of villages, small towns and rural communities. **Examples:**

- **Direct selling** is a flexible part of retail that allows individuals—particularly women—to run micro-businesses with limited upfront investment. It offers flexibility, community support, and training for people with little or no previous entrepreneurial experience. The model is particularly impactful in rural areas or regions with limited employment opportunities. Companies provide structured training in interpersonal skills, product knowledge and business basics, enabling many entrepreneurs to build confidence and economic independence.¹¹
- Nearly **50% of food-retail franchise stores in Spain**¹² are run by women as SMEs, offering an accessible path to business ownership supported by established systems and proven business concepts. Franchising reduces risk for first-time entrepreneurs and has created thousands of jobs, especially in rural areas where local supermarkets play a central role in community life and territorial cohesion. In rural areas, entrepreneurs have revitalised local economies through small retail and food production businesses, demonstrating the importance of strong local roots and community-based entrepreneurship.
- Italy demonstrates the role of retail and wholesale as a driver of inclusive and local entrepreneurship. Around 277,000 women-led businesses operate in wholesale and retail trade, while 68.5% of all women-led businesses are active in market services, rising to 76% among women entrepreneurs under 35. By supporting female entrepreneurship, business creation and generational renewal, commerce contributes to maintaining economic activity, local services and community vitality across urban, rural and remote areas.

Retail and wholesale is constantly looking for solutions to react to changes in consumer demand, how they like to shop and they operate in a highly competitive environment. This fuels innovation across the market even if it is not classically perceived as innovation. Retail and wholesale also provides a ready market for innovation not only directly in its operations (e.g. green transport, energy-efficient premises, etc.) but also in the daily lives of customers (e.g. more sustainable/better-for-the-planet consumer electronics, clothing, and supply of greener construction and electrical equipment for home or office installations, more sustainable private label food choices).¹³

Microenterprises and SMEs can play an important role in attracting former residents back, creating local jobs and strengthening local demand. For example, Galicia's *Estrategia Retorna*¹⁴ includes measures to support self-employment and the creation of SMEs by returning residents in rural areas, contributing to job creation, local economic renewal and the long-term vitality of rural communities.

¹¹ [#DirectSellings - Home](#)

¹² [ASEDAS: Spanish Association of Distributors, Self-Service and Supermarket](#) and https://asedas.org/wp-content/uploads/2026/05/Observatorio-Distribucion-Proximidad_Mayo_2026_22_05.pdf

¹³ Our yearly [State of Grocery Retail](#), [Ecommerce Report](#), and the [State of Retail](#) report, provide examples with our capability to move to net zero and advance circularity explained in our study, '[Sustainability, Digitalisation, Skills: Transforming EU retail and wholesale](#)'.

¹⁴ [Return Strategy 2023-2026 - Xunta de Galicia](#)

Creating local value chains, supporting SMEs and regional producers.

Retail and wholesalers are also supporting millions of further jobs throughout the supply chain, from small local suppliers to international businesses. This comes from the multitude of products sold by retail and wholesale, and the innovation of the sector.

The sector has been pioneering organic and ‘free-from’ products, offering local foods and specialties, vegan choices, and alternatives to animal-based products, using third-party and private quality standards for their own brand products to ensure product quality and guide consumer choice. For example, pre-Covid, organic food sales grew 12% per annum across Europe, with growth driven particularly by larger, mainstream retailers who make up more than half of organic sales to consumers. Since COVID, growth has not been as strong, but organic retail sales in the EU reached €49.5 billion in 2024, up from €47.8 billion in 2023 and €45.2 billion in 2022. This corresponds to annual growth of 5.6% in 2023 and 3.6% in 2024.¹⁵ A study undertaken by DG Competition in 2014¹⁶ showed that private labels contributed to increased consumer choice. These labels continue to play an important role in innovation.¹⁷

Retailers and wholesalers have launched a wide range of initiatives to improve sustainability - phasing out certain non-sustainable products, working with local actors in the supply chain, and improving production conditions and environmental impacts of what they buy and sell. However, retailers have only very few direct dealings with farmers (less than 5%) and sustainability needs action from all parts of the chain. Retailers have over the years invested in supporting local farmers in offering differentiation and choice to consumers and encouraging sustainable production. Schemes such as dedicated supplier networks, tri-partite contracts, and voluntary initiatives help address emerging trends in reducing pesticide use and enhanced animal welfare and often include a direct reward to farmers investing in these changes. They also offer flexibility to quickly respond to market needs, help raise standards ahead of legislation, and are already contributing to many strategies to reduce pesticides, fertilisers, and antibiotic use, as well as increasing the organic production.¹⁸ The existing framework, which supports market functioning or farmer autonomy allows actors to adapt solutions to different production contexts especially when based on predictability, transparency and long-term cooperation.

Retail and wholesale also can play a supporting role by promoting regionally differentiated products that reflect Europe’s territorial diversity. This helps respond to consumer demand for local products and enhances the resilience of food systems in times of global disruption.

In addition, retailers and wholesalers can support suppliers in the energy transition, through capacity building. For example, supporting the transition to more resource efficiency (e.g. in planning routes), improving energy efficiency, and greener logistics and delivery.¹⁹

¹⁵ FiBL dataset (Research Institute of Organic Agriculture)

¹⁶ [The economic impact of modern retail on choice and innovation in the EU food sector - final report](#)

¹⁷ ‘Private labels increasingly drive innovation and evolve into brands in their own right.’ And ‘Private labels are also setting the pace for innovation. In multiple categories, private labels are innovating faster than manufacturers. The private label share of total innovation activity—measured by the number of new product launches, new varieties, and range extensions—sits at 44 percent in Western Europe across all grocery product categories, and as high as 70 percent for food categories (Exhibit 11).’ Page 20, [State of Grocery 2026](#).

¹⁸ [Farm to Fork - EuroCommerce](#)

¹⁹ [Supporting Energy Transition - EuroCommerce](#)

Examples²⁰

- Jerónimo Martins sources at group level around 90% of its food from local suppliers. In Poland they have 230 active partnerships with small local producers. They also buy the ugly fruits and vegetables and repurpose them to soups, pre-cut, ready-to-eat salads, soups, animal feed.²¹
- Sonae has created a platform to facilitate exchange among the various actors in the supply chain. With 365 members – including producers’ organisations, individual farmers, and family businesses – this structure strengthens the relationship between the retailer and local producers and offers the latter a guaranteed channel to sell their goods.²²
- Metro supports local producers in 5 Italian regions, giving them visibility and promoting their local products.²³

2. Ensuring access to essential services

Retail and wholesale ensures access to essential services by:

- Providing proximity.
- Providing availability in times of emergency or as part of national preparedness.
- Contributing to urban circularity, including tackling food waste and contributing to sustainable development and consumption.
- Enabling urban mobility and modernisation of infrastructure, contributing to cities’ decarbonisation and energy efficiency.

Providing proximity

Whereas cities can rely on a dense mix of facilities, rural communities often depend on a limited number of anchor functions. Retail and wholesale guarantee **daily access to food, medicine, and essential goods**, particularly where public services are limited. In remote regions, retail often compensates for **gaps in infrastructure and services**, helping residents maintain a good standard of living—one of the key conditions for the right to stay.

That proximity also can only continue if there is an appetite and adequate framework for business transfers, which requires the recommendations of the anticipated Commission Recommendation on Business Transfers²⁴ being implemented nationally and at the local level.

Examples:

- In the Netherlands, *Impulsaanpak Winkelgebieden*²⁵ retail has triggered more than €500 million in local investment, supported the realization of over 5,000 homes, and helped transform 133,000sqm of retail space in town centres.

²⁰ See some examples of <https://www.eurocommerce.eu/sustainable-commerce/support-to-local-farmers/>

²¹ <https://www.jeronimomartins.com/en/sustainability/governance/relationship-with-suppliers/>

²² <https://www.jeronimomartins.com/en/sustainability/governance/relationship-with-suppliers/>

²³ <https://www.metro.it/servizi-info/metro-italia/sostenibilita>

²⁴ Anticipated on 22 June 2026

²⁵ [Resultaten Impulsaanpak winkelgebieden | RVO.nl](#)

- In the Netherlands, retail is increasingly embedded in multifunctional buildings combining shops with healthcare, libraries, social services and community spaces. These centres increase efficiency, share footfall and ensure financial viability where standalone retail would struggle. Evidence from these models shows higher visitor frequency and stronger social interaction, particularly among elderly residents and families. In addition, where shops have closed, some villages have developed cooperative supermarkets and community-owned retail initiatives. These models explicitly internalise social value, allowing residents and municipalities to co-invest where commercial margins alone are insufficient. Evaluations show that these initiatives are more resilient and foster higher levels of community engagement than purely commercial alternatives.²⁶
- Since 2022, COOP Czechia has introduced hybrid 24/7 shops that combine AI-driven automation with conventional service, bringing modern retail to rural communities. Open around the clock and integrated with COOP's online shop, these stores provide extensive product choice, secure self-service access, and convenient outdoor pick-up boxes for e-commerce orders. The concept reduces the need for long journeys to larger towns, saving residents time, money, and fuel while preventing rural "food deserts". It also keeps local shops economically viable, supporting small communities and strengthening regional self-sufficiency.²⁷

Providing availability in times of emergency or as part of national preparedness

Retail and wholesale provides an essential role in the European economy in serving EU consumers with the products they need every day and facilitating trade between businesses. The experiences from the Covid pandemic and more recently, the blackouts in Spain and Portugal²⁸ underscore the essential role of retail and wholesale in crisis response.

The retail and wholesale sector has proven its strength in crisis management and has existing contingency plans. They should be a basis for national plans and crisis protocols²⁹, for the testimony on the work done by the retail sector in Spain.³⁰

Contributing to urban circularity, including tackling food waste and contributing to sustainable development and consumption.

Retailers and Wholesalers are innovating and developing their own infrastructure to collect, sort, reuse and recycle plastic waste or food, to achieve higher rates of closed-loop recycling.³¹ For these to be widely deployed, there needs to be clarity on responsibilities, including for costs, and more development of opportunities through public-private partnerships. Practically, such investments can

²⁶ [Nieuwe publicatie DNWS: De moderne agora - Retailland](#)

²⁷ See: <https://youtu.be/3NiB3IkXEM4?si=va5rr9ci0FVuFleg> and [European Commerce Awards 2025 - EuroCommerce](#).

²⁸ <https://www.eurocommerce.eu/2025/05/critical-importance-of-the-retail-and-wholesale-sector-learnings-from-the-electricity-blackout-in-spain-and-portugal/>

²⁹ The Commission's food security group has adopted three sets of recommendations, focusing on [crisis communication](#), on [diversity of sources of supply](#), and on [mitigating risks in the food supply chain](#). EuroCommerce contributed to these with the experience of retailers and wholesalers during the COVID crisis and other instances (serious weather events, shortages etc).

³⁰ <https://ec.europa.eu/transparency/expert-groups-register/screen/meetings/consult?lang=en&meetingId=64669&fromExpertGroups=3829>

³¹ https://mcusercontent.com/4a74fff5ca3121b6c30b96012/files/8c8d19cf-a6fb-e81a-147c-c091c062ba9e/Study_Transforming_the_EU_retail_and_wholesale_sector_Sustainability_Digitalization_Skills.pdf

be supported through easier and quicker procedures to grant permits to allow structural changes (e.g. to install onsite recycling facilities).

Some retailers and wholesalers want to develop their own infrastructure, for example, to collect, sort, reuse and recycle plastic waste or products at the end of their use, to achieve higher rates of closed-loop recycling. This could require the Commission to encourage Member States to adapt their town and country planning frameworks and procedures to be more agile, including in (historic) town centres, so that it is easier and quicker to grant permits (e.g. to repurpose real estate, to adapt stores to allow experimentation with new business models or install such infrastructure). Similarly, to enable new warehouses and fulfilment centres, including dark stores, in a manner that takes into account the interest of all stakeholders so that there can be 'peaceful co-existence' of such business models that may serve local populations. As well as engaging all actors³² involved with town and country planning procedures and decisions to understand and facilitate the changes needed. Taking a Single Market approach in supporting measures, would also support new business models, for example, to stop the disparity in sorting and recycling across Member States.

The scale of investment needed to move to circularity is huge. It requires massive investments to scale up the flow from a retailer to final customers and from final customers to the retailer (e.g. in terms of repair, buy-back, second-hand sales, recycling, renting), to make products repairable (e.g. in workshops, or by customers) and to dedicate space to second-hand items in stores. It requires the technicians to have the skills as well as the space to repair products. Despite these hurdles, there are examples of retailers developing such initiatives.³³ We will also need policies that encourage the circular economy, reducing waste and reusing materials. For example, in relation to recycling, product re-use and reduction of single-use plastics taking on board what retailers and wholesalers are already doing to work in support, rather than against what is already developed.

Food retailers and wholesalers also take action to support sustainable operations through sector or company initiatives, reducing resource use and the environmental impacts of our operations. We innovate on packaging, help consumers and suppliers reduce food waste and phase out chemicals. There are many examples of such initiatives across the EU.³⁴ Many retailers and wholesalers are making donations to food banks and even provide logistic-related help to food banks. For example, providing suitable refrigerator equipment and transportation of non-dry food products. This can further encouraged, for example, by exempting food donations from VAT.

Contributing to towns and villages decarbonisation and energy efficiency efforts

The potential role of retail and wholesale in enabling access to reliable energy sources at affordable prices should be recognised. Creating incentives to increase investments in net zero operations, including the generation and storage of green energy itself, can offer win-win outcomes. These benefits will help provide the EU with the opportunity to meet its climate goals and will encourage improvements in energy efficiency and innovation by businesses. This, in turn, will help reduce energy price volatility and offer more stable prices for EU citizens, improving the competitiveness of our EU businesses and the competitiveness of the EU itself, simultaneously.

Retailers and wholesalers are estimated to need to invest up to €190 billion between 2022 and 2030 to switch to renewable energy, as part of their investment in net zero stores (which requires an investment of up to €50 billion) and net zero warehouses (which requires an investment of up to €140 billion). Such investment could help the EU achieve its ambition to cut greenhouse gas emissions by

³² For example, through roundtables that enable exchanges between all key local actors such as local authorities, representative associations, residents, property owners, banks and local businesses engaged in tourism, leisure activities, HoReCa, etc

³³ [Decathlon Sustainability](#)

³⁴ [Food Waste - EuroCommerce](#)

55%, compared to 1990 levels in accordance with the Fit for 55 Strategy. Action by retailers and wholesalers toward net zero operations can potentially reduce the sector's Scope 1 and Scope 2 emissions by 50-90% by 2030.

There is huge potential when you consider the size of the real estate in the sector. It is estimated there is approximately 500 million sqm of real estate in the EU. One distribution centre for example, can be the equivalent in area of 28 football pitches.

Where retail and wholesale are considered important to other ecosystems (e.g. mobility, tourism, horeca) this can help policy coordination. If mobility plans encourage greener alternatives for employees and customers to reach stores and warehouses and last mile delivery (e.g. investments in safe cycling routes, public transport including the collaborative economy) this can contribute to cities' decarbonisation and energy efficiency efforts. On a more basic level, efficient (public) transport enables access to employment opportunities, and the social interaction around stores.

More broadly, Member States should be encouraged to develop more comprehensive strategies that includes structural reforms and include essential long-term aspects such as infrastructure investment to ensure a more secure and resilient EU economy. This requires investment in infrastructure that enables reduction in costs (e.g. energy, recycling, waste).

In the Netherlands, the Retail Agenda³⁵ offers practical SME orientated suggestions to support sustainability and circularity. This includes reduced VAT for repair adapted to national specificities, simpler access to circularity subsidies, support for collective applications, clearer rules for second-hand and refurbished products, financial and knowledge support for SMEs investing in energy efficiency, logistics and circular business models.

3. Strengthening social cohesion and community life

Retail spaces act as **social hubs**, supporting community interaction, local identity, and civic life.

Your local shop or wholesaler is more than a service for buying and selling or fulfilling a role as supplier to your local café, plumber or builder, they are an integral part of the relationship with the local community. The sector's businesses and owners are each connected to the local area and they are all socially active in and around their store or warehouse, contributing to the vitality of the community. The entrepreneur and his or her employees create a bond amongst citizens and bring character to local areas (capitals, small towns, rural areas). They support local schools and neighbourhood events and help to create an environment where people want to live, work and bring up their families. They are a place for social interaction, and daily contact, especially for the elderly and vulnerable where they combine services such as banking and postal services.

They also play a role in developing consumer interest in sustainable products or the impact of their behaviour on the planet should be considered in discussions on the food environment. Retailers and wholesalers are raising consumer awareness³⁶ and action taken by other actors such as the Commission, education authorities and providers who could adapt school curricula, and consumer representatives or NGOs could drive further change.

³⁵ [De Ondernemersagenda Retail | Vakcentrum](#)

³⁶ [Education & Lifestyle - EuroCommerce](#)

Examples³⁷:

- “Noi Amiamo” is a nationwide programme launched in 2017 by Gruppo VEGÉ to strengthen local communities by turning everyday grocery shopping into meaningful support for schools, sports clubs and animal shelters. Through simple code-based donations at the checkout, families can contribute directly to the organisations they care about.³⁸
- Since 2017, SPAR Slovenia has worked with the Slovenian Diving Federation to protect and restore the country’s lakes, rivers and coastal areas through a long-term community initiative. The programme brings together volunteers, schools and local organisations for nationwide clean-up days and educational activities that raise environmental awareness and improve the health of aquatic ecosystems.³⁹
- The Vakcentrum handbook, “The Independent retailer has added value”⁴⁰ contains many examples of community support including sponsoring local sports clubs, local activities, school activities, and activities for the elderly. As well as contributions to safety and liveability, solidarity, healthier lifestyles, sustainable practices, and opportunities for young people.
- ‘Kletska’ is an initiative that introduces slow lanes for customers who are not in a rush and want to have a conversation with the cashier.⁴¹
- In several Italian regions, Commercial Districts represent a successful model of multilevel governance, particularly effective in revitalising small cities and towns, counteracting depopulation and the loss of economic activities. These structured partnerships bring together local authorities, neighborhood businesses, and representative associations to co-design active policies. By joining forces, the Districts improve the quality of public spaces and citizens’ quality of life, promote the cultural and tourism vocations of the area, and support the local economy, enabling neighbourhood commerce to compete with the major challenges of the market. This instrument demonstrates that active collaboration between institutions and the business community is essential for fostering the growth of both the economy and the territory, ensuring a genuine and vital “right to remain.”

KEY CHALLENGES FOR RURAL AND REMOTE AREAS

We confirm the Commission’s identification of **structural challenges**, including depopulation, limited services, and weak economic bases in rural and remote areas.

When shops close, this increases travel distances and entails higher transport costs for those wishing to access essential services and reduces the frequency of social interactions. The decline also leads to reduced quality of life, weakening of local communities and accelerated population loss and territorial imbalance.

³⁷ See also the nominees in the Community Engagement Category from the EuroCommerce Awards [2023](#) and [2025](#) editions.

³⁸ See <https://youtu.be/3iVTAYlsLkc?si=tiY4hH1y1wOYkbg> and [European Commerce Awards 2025 - EuroCommerce](#).

³⁹ See: <https://youtu.be/kcA-Ae3wYul?si=KMf2HpYIErjMKRC> and [European Commerce Awards 2025 - EuroCommerce](#)

⁴⁰ [book-the-added-value-of-the-independent-sme-retailerpdf0196pdf.pdf](#)

⁴¹ For example, [Dutch supermarket introduces unique slow checkout lane for lonely seniors - Scoop Upworthy](#)

From a retail and wholesale perspective, the factors that affect the ability for people and businesses to remain in a certain place include:

1. Lack of infrastructure

- Poor transport connectivity increases **logistics costs**.
- Insufficient **digital connectivity limits omnichannel retail development**.
- Energy and waste infrastructure gaps hinder **sustainability investments**.

2. Regulatory fragmentation and rigidity

- Complex and slow **planning and permitting procedures**.
- **Disproportionate and unnecessary** national and regional measures.
- Divergent rules across Member States affecting **Single Market efficiency**.
- Lack of cooperation and coordination of **enforcement** authorities.

3. Declining demand and viability risks

- Aging populations and outmigration reduce **customer base**.
- Difficulties maintaining **economically viable operations** in sparsely populated areas.

Without targeted support, these dynamics risk a **retreat of retail and wholesale**, further exacerbating territorial inequalities.

POLICY RECOMMENDATIONS

From a retail and wholesale perspective, public policies to support prosperity and help make EU regions remain an attractive place should focus on:

1. Improving infrastructure and connectivity⁴²

The right to stay requires adequate infrastructure. The EU should:

- Support **transport and logistics networks** for last-mile delivery in remote areas.
- Accelerate **high-speed broadband deployment**.
- Invest in **energy and circular economy infrastructure** to enable sustainable retail and wholesale models.

Digitalisation is particularly critical to:

- Enable **e-commerce access for rural consumers**.

⁴² See: [A TRANSITION PATHWAY FOR A MORE RESILIENT, DIGITAL AND GREEN RETAIL ECOSYSTEM](#) for the underlying reasons why these policy recommendations are made, together with EuroCommerce's contribution to the Retail Transition Pathway ([Retail Transition Pathway – Retailers and Wholesalers' vision for a more resilient, digital and green future.](#)) and our position paper, '[Beyond Manufacturing: A new competitiveness agenda for the EU in partnership with retail and wholesale.](#)'

- Allow SMEs to reach **broader markets**.

Energy and circular economy initiatives can support new business models tailored to rural realities. Retailers and wholesalers are already innovating through repair, reuse, and circular services⁴³.

The EU should:

- Encourage **experimentation and pilot projects**.
- Provide **funding and technical support**, particularly for SMEs.
- Ensure coherence with Single Market rules to enable **scaling across regions**.
- **Accelerate permitting and grid connection processes.** Accelerating permitting and grid connection processes is essential to unlock renewable deployment and improve overall system integration.⁴⁴ Clear and binding maximum timelines for permitting should be introduced, procedures should be faster, simpler and more transparent, particularly for small-scale and rooftop installations in commercial and urban areas, transparent information on available grid capacity should be ensured and Member States should commit to the necessary grid investments and modernisation to support decentralised generation, storage deployment, and increased electrification.
- **Ensure the digitalisation, standardisation, harmonisation and coherence of permit-granting procedures across the various Digital System Operators (DSOs):** Harmonised procedures, and standardised forms and rules that can be completed digitally through a one-stop shop would benefit businesses enormously.⁴⁵
- **Establish harmonised, long term and accessible financing mechanisms to unlock investment at scale and ensure access to affordable energy:** Long duration, harmonised and easily accessible financing instruments should be created in order to support capital intensive retrofits in commercial buildings, refrigeration systems, HVAC upgrades, logistics and digital energy management technologies (e.g., ESCO models).⁴⁶
- **Ensure stability and predictability for corporate Power Purchase Agreements (PPAs):** Stable, clear and predictable rules, especially across countries, is critical as corporate PPAs, including virtual structures and self-consumption models, are essential tools for companies to meet their decarbonisation targets. Given the ongoing challenges of grid constraints, price volatility, and limited system flexibility, the regulatory recognition of these instruments should be preserved and strengthened. Cross-border PPA structures should be facilitated, and clarity on additional requirements should be provided, allowing companies to benefit from the internal energy market. A clear, long-term regulatory outlook is also vital to encourage significant capital

⁴³ For example, [Sustainable Textiles - EuroCommerce](#) and [Sustainable Commerce - EuroCommerce](#)

⁴⁴ Slow and complex permitting procedures, as well as grid bottlenecks constitute major barriers. These constraints directly affect companies' ability to deploy on-site renewable generation, enter into Power Purchase Agreements linked to new capacity, and electrify key operations, including refrigeration, HVAC systems, and logistics.

⁴⁵ As significant energy users, retailers and wholesalers operating across different sites, regions and member states must submit applications to several DSOs when seeking a new or upgraded grid connection, with procedures varying from one network operator to another.

⁴⁶ Our sector is a significant energy user but does not have sufficient access to support measures comparable to those available to other energy-intensive industries. Financing remains fragmented, short term and difficult to access, discouraging both SMEs and large corporates from investing in energy efficiency projects.

investments required for developing large-scale renewable energy assets and supporting infrastructure.

- **Match decarbonisation and sustainability targets in legislation or strategies** (e.g. requirements under the RePower EU programme, energy efficiency in buildings, installation of electric vehicles, charging stations and solar panels) with mechanisms to support such investments.

2. Place retail and wholesale at the core of the Right to Stay Strategy

The Commission should recognise retail and wholesale as **essential territorial infrastructure**, alongside transport, healthcare, and education.

The EU should:

- Integrate retail and wholesale in **cohesion policy programming**.
- Recognise the sector as a **key enabler of local resilience and attractiveness**.
- Systematically include the sector in **regional and rural development strategies**.

This should work in conjunction with the EU Agenda for Cities.⁴⁷ Where we have called for the EU⁴⁸ to expand its vision to:

- Grant a role for retail and wholesale in the annual high level political dialogue and Cities Forum to provide the hands-on experience to inform policy discussions.
- Recognise the challenges facing retail and wholesale State of European Cities report.
- Dedicate a space for retail as part of industry-city dialogue in the Cities Portal to collect data and raise awareness of initiatives that can support retail and wholesale's contribution to the social fabric of cities.

3. Strengthen multilevel governance and stakeholder involvement (public private partnerships)

A place for retail and wholesale should be created in EU, national and local governance systems. To help make regions attractive places, this needs:

- Early and systematic **consultation with businesses and local actors**.
- Stronger **coordination between EU, national, regional, and local authorities**.
- Exchange of **best practices across regions**.

Retail and wholesale actors should be recognised as **key partners in policy design and implementation**, reflecting their frontline role in communities. Action with the Commission should be in partnership with DG GROW and DG EMPL and encouraging this nationally.

⁴⁷ [EU Agenda for Cities – EuroCommerce views - EuroCommerce](#)

⁴⁸ https://www.linkedin.com/posts/eurocommerce_retail-wholesale-euagenda-activity-7402268880888295424-ijjp?utm_source=share&utm_medium=member_desktop&rcm=ACoAACIC2QkB6LWENm-OtuMEFsZZcXLAN2Zor1g

This requires:

- Formal mechanisms for consultations and use of technical expertise, from planning to evaluation to listen to the businesses and local actors it intends to serve.
- Development of partnerships with educational institutions to develop innovative solutions.
- Promoting public-private partnerships for integrated management to optimise resources and increase efficiency in the management of commercial areas.
- Prioritising safe retail areas. Shoplifting, aggression, online fraud and cybercrime are growing concerns for entrepreneurs. Faster digital reporting, collective measures against repeat offenders and cyber-resilience support for SMEs will help contribute to safe retail areas.
- Development of entrepreneurship-based repopulation initiatives.

To make this effective, we underline the importance of EU funding and coordinated initiatives to revitalise town centres. Stronger cooperation between cities and business organisations can help shape funding priorities and support initiatives aimed at maintaining vibrant local economies.

4. Launch an EU programme for revitalising rural, remote, and small urban areas

Building on the **#RevitaliseRetail initiative**, the EU should develop an **ambitious programme** targeting small towns, villages and remote and sparsely populated regions.

This programme should:

- Place **retail and wholesale at the heart of local ecosystems**.
- Support **multi-functional retail spaces** (e.g. combining retail, logistics, services, ‘repair cafes’).
- Promote **innovative formats** adapted to low-density areas.
- **Promote best practices to encourage new retail concepts** in town centres. For example, through experimentation, and liaison with incubators, creating of living paces labs, to encourage footfall.
- **Encourage marketing and communication campaigns** and events (e.g. street commerce events), that also encourage **local shopping**.
- **Improve accessibility and the environment in urban spaces** (e.g. rehabilitation of squares, streets, public spaces, abandoned buildings, creating temporary art installations or competitions related to them) and reinforce the historical identity and cultural value of urban spaces (making a link to tourist projects).
- **Examine how funding for local revitalisation initiatives can be improved**, for example updating the Commission’s guide on crowdfunding by local authorities to enable sustainable finance for revitalisation initiatives or use such alternative finance initiatives in conjunction with EU funds to develop initiatives with retail and wholesale at the heart.

- The development of projects together with Interreg, URBACT or further support the Retail Transition Pathway website as a **knowledge hub on retail and wholesale** making a connection to urban actors.
- **Ensure a link with security** ensuring a safe place to live and work and adopting measures to help combat the rise in theft and crime.

Promote the exchange of **best practices on entrepreneurship-based repopulation initiatives**. Such an intervention can build on ongoing work of the OECD on Local Commerce, Global Trends⁴⁹, including the data collection⁵⁰ and proposed policy toolkit for local policymakers to support small retail. It also can be supported through renewed funding for the continuation of the Capitals of Small Retail Awards⁵¹ after 2027. The award organises workshops amongst winning cities, which encourages best practice exchange, and could be expanded to encourage hybrid applications that enable retail associations to be applicants.

Where locations may be less profitable for food retailers and wholesalers, incentives could be provided to encourage establishment. This could include encouragement to Member States to adapt their town and country planning frameworks and procedures to be more agile, including in (historic) town centres, so that it is easier and quicker to grant permits (e.g. to repurpose real estate, to adapt stores to provide an experience and to allow experimentation with new business models).

Example

- In Portugal, the Statistical Information Platform has been made available by the Observatory ‘Services, Urban Competitiveness and Territorial Cohesion’ since 2024. This contains disaggregated information by municipality for a wide range of indicators, namely on trade and service activities. This has enabled reports on economic activities in Portugal and the creation of a map of commerce, services and restaurants that profiles an online georeferenced database of establishments. These projects are promoted by the Directorate General for Economic Activities to enable the identification of all existing establishments in the country, geographical location and characterisation. This supports policy decisions based on knowledge, helps guide public investments, enables better evaluation of projects, and enables private investors to assess existing market conditions and the likelihood of success of their investment projects.

5. Ensure agile and proportionate planning and regulatory frameworks

The Commission recognised in its Single Market Strategy 2025⁵², that retail competitiveness is held back by numerous restrictions of the establishment of shops and their operations. Urban policies can minimise the importance of a structured approach to the sector, leading to the concentration of retail in certain areas, an increase in vacant spaces, and a loss of multifunctionality in city centres. These factors compromise the sustainability and attractiveness of cities, driving residents away and

⁴⁹ https://www.oecd.org/en/publications/local-retail-global-trends_55e2edec-en.html

⁵⁰ It is essential to have adequate statistical information that helps understand trends and changes.

⁵¹ https://single-market-economy.ec.europa.eu/single-market/services/retail/european-capitals-small-retail-ecosr_en

⁵² ‘Many of these restrictions may be justified by legitimate public policy objectives such as town and country planning and maintaining the vitality of city-centres. However, they need to be proportionate as some may create market entry barriers and negatively affect competition, productivity and innovation. A 10% reduction of barriers in retail services would increase EU gross value added by 0.6%.’ [d92c78d0-7d47-4a16-b53f-1cead54bcb49_en](https://single-market-economy.ec.europa.eu/single-market/services/retail/european-capitals-small-retail-ecosr_en)

weakening the economic fabric. Increasing the attractiveness of housing above shops, also helps create active and lively centres outside of opening hours.

In the Netherlands, entrepreneurs increasingly combine functions, such as retail with repair, services, hospitality, second-hand, community functions or cultural activities. Planning and licensing frameworks that facilitate this could allow these combinations especially in smaller towns and villages, where multifunctionality is often necessary for viability.

Member States should:

- Simplify and accelerate **planning and permitting procedures**, while respecting the competences of the different state, regional, and local actors.
- Consider allowing **flexibility in land use and store formats**.
- **Facilitate best practice exchange to encourage new retail concepts in town centres**. For example, through experimentation, and liaison with incubators, to encourage footfall.
- **Facilitate best practice exchange with local actors**⁵³ involved with town and country planning procedures and decisions to understand and facilitate the changes needed by retailers and wholesalers (e.g. to enable them to adapt stores to take on new functions, allow new warehouses and fulfilment centres).
- **Consider location, accessibility** (e.g. accessibility to pedestrians, cyclists, promote interaction between residents of all socioeconomic backgrounds and between residents and visitors), **urban mix** (e.g. inviting, green areas, appropriate mix of commercial establishments), **infrastructure, and sustainability** (e.g. circularity, efficient use of resources, reduced energy consumption, renewable energy sources), **to create an integrated approach to planning frameworks**. This could be based on sustainable attractiveness to balance tourism with all actors in a local area. This can lead to economic growth, improved quality of life, social integration and urban revitalisation.

A **proportionate approach** is essential to avoid barriers to investment and innovation in regions that need it most. This can be further strengthened by the Commission's commitment to develop guidance for Member States on the proportionality of their retail regulation (expected in Q4 2026).

Such an intervention could build on the work of the Commission in relation to the Retail Restrictiveness Indicator⁵⁴. We encourage the Commission to regularly update the Retail Restrictiveness Indicator (RRI) and improve it where necessary, also in dialogue with retail and wholesale stakeholders and the Member States. The revised indicator should continue to reflect not only administrative procedures, but also the substantive national and regional restrictions that materially affect market access, operational freedom and cross-border retail activity.

This tool could be made more effective by ensuring its recommendations are regularly discussed with the Member States and in consultation with sector representatives. For example:

- The Commission should continue to refer to the RRI in the country reports of the European Semester exercise and include country-specific recommendations to ask Member States to remove unnecessary and unjustified barriers.

⁵³ Key local actors could include local authorities, residents, property owners, banks and local businesses engaged in tourism, leisure activities and HoReCa, alongside retailers and wholesalers, and representative associations.

⁵⁴ [Retail Restrictiveness Indicator \(RRI\) - Internal Market, Industry, Entrepreneurship and SMEs](#)

- The Commission should encourage best practice exchange that could result in the removal of barriers or more proportionate and effective restrictions, either through the Single Market Enforcement Task Force, through the creation of a dedicated retail expert group, through a commitment to hold a minimum number of retail and wholesale focussed discussions on the Services Directive Expert Group each year, or other relevant fora.
- The Commission should commit to a schedule, so the RRI is updated at regular intervals to better enable tracking of progress (or not) to provide the evidence base to encourage action by the Member States and for country-specific recommendations.
- The Commission could, for example, where representative associations indicate this could be useful in their Member State, improve the RRI by collecting more data from regional and local levels, to properly capture the situation in the Member States.⁵⁵ Alternatively, the Commission could share the methodology for the RRI with the Member States so they can create the same and ensure compliance via country-specific recommendations in the European Semester and support this through the Technical Support Instrument. This could also provide the evidence base that Member States may need to improve the performance/compliance with the Single Market of rules made at the regional and local levels.

6. Safeguard employment

As recognised in the joint Social Partner contribution to the Quality Jobs Roadmap⁵⁶, employment in retail and wholesale can be promoted through:

- Increased visibility and value of apprenticeships as a quality option for young people in both rural and urban areas.
- Improving public education systems, including IT infrastructure, especially in rural areas.
- Better public understanding of retail and wholesale career paths will support recruitment and retention in a fast-changing world.

A greater public understanding of career paths in retail and wholesale will help support both recruitment and retention of employees. Highlighting the significance of retail and wholesale as one of the top employers in rural areas, along with the value of its apprenticeship programmes, can attract local talent to both urban and rural regions. Promoting a positive image of the sector, emphasising its essential role, stability, specialised jobs, and exciting career opportunities in emerging fields like e.g., e-commerce.

Employment in our sector is closely tied to customer demand and the flow of goods, requiring services to be delivered in real time. This dynamic necessitates careful and responsive workforce planning, where having the right number of workers at the right moment is critical for maintaining both service quality and operational efficiency.

Societal trends that impact shopping behaviour and create fluctuations in demand also affect the level of service expected. There is a growing trend towards making multiple shopping trips per week to neighbourhood stores and “on-the-go” stores, at the expense of large purchases in big supermarkets. There are increasing numbers of single-person households (including single parents). Evening and

⁵⁵ For example, to analyse the tax on establishments of more one, the special tax on establishments of more than 2,500m² surface area that exists in five Spanish regions: Catalonia, Asturias, Aragón, Navarra and Valencia.

⁵⁶ [20250625-joint-response-uni-europa-quality-jobs-roadmap.pdf](#)

Sunday shopping are also on the rise, driven by the increasing number of working individuals and dual-income households.

Preserving flexibility in collective agreements within the framework of labour laws enable retailers and wholesalers to match labour with consumer demand. Retailers and wholesalers provide flexible job opportunities, with about a third (32%) of workers in part-time roles. This flexibility can play a pivotal role in supporting women's financial independence and 62% of the workforce are women. When women can access flexible work arrangements, they are more likely to remain in the workforce, manage caregiving responsibilities, and pursue career advancement.

We consider that strict regulations on part-time work can unintentionally discourage younger workers from seeking employment, particularly when only full-time, fixed-hour positions are available. This issue is evident in Finland, where the Finnish Collective Agreement mandates a minimum of 4 hours per week in parttime contracts - a condition that many young workers are reluctant to accept. It is important to keep in mind that we are facing labour shortages, and this challenge will only become more acute with the aging population in the EU. As such, we also need to respond to the evolving needs of workers especially new generations-whose preferences and expectations may be shifting.

We also consider quality early childhood education and care is vital for both social and economic development. Childcare availability, especially in rural areas, remains a significant challenge.

- In Austria, for example, only 30% of children under the age of three are in childcare, and fewer than 50% of childcare facilities are compatible with full-time employment. As a result, 71% of women in Austria with children under six work part-time, which restricts their career growth.
- In Germany, traditional childcare institutions typically operate only Monday to Friday, often failing to accommodate the needs of retail workers, especially on weekends or during late opening hours (e.g., until 8:00 p.m.).

There are additional elements that act as horizontal enablers:

- Access to finance, which will also enable investment in people as well as improve overall competitiveness (e.g. to deploy training programmes at scale through online learning platforms) and support upskilling and reskilling.
- Supporting SMEs and encouraging entrepreneurship (e.g. through education, reducing paperwork)), and business succession in retail and wholesale, including targeted measures for young entrepreneurs and women-led businesses through access to finance, mentoring, training and business transfer schemes, particularly in rural, remote and underserved areas.
- Support for research and innovation to encourage new business model and areas for growth, to encourage competition and enhance competitiveness.
- Improving policies to ensure that no area is left behind, to address labour shortages in underserved, remote or rural areas that are also linked to the lack of attractiveness or lack of essential services for workers.
- Preparing for demographic shifts.

7. Restore the level playing field in retail to address growing concerns over non-compliant third country traders and marketplaces

In the past years competition from non-EU-based traders and marketplaces targeting EU-based consumers has drastically increased. The proportion of EU consumers making online purchases from sellers outside of the EU has risen by 36% between 2016 and 2022. Part of their rapid growth is based on unfair competition.

More competition is always welcome, but all players need to respect the rules. Some non-EU-based players have doubled or even tripled their online market share in a very short amount of time. At least a part of the success of these third-country players is based on aggressive marketing practices, misleading and manipulating consumers, not respecting EU consumer protection rules, offering products that do not comply with EU product safety rules, lacking due diligence, disregarding customs rules, breaching data protection rules, creating unsafe online environments, subsidies received from authorities.

If we want a vibrant, healthy and competitive European retail sector in 2030 with strong EU-based players, decision-makers and enforcement authorities need to prioritise creating a level playing field. Without this, the viability of retail in more remote areas that are less able to compete on price and availability, is under even more pressure.⁵⁷

This requires the EU to:

- Establish an EU framework for enforcement authorities to collaborate and coordinate activities across enforcement domains at national and EU level.
- Create a permanent Commission Task Force against Unfair Competition from third country operators with a clear mandate, which is transparent, involves all relevant DGs and stakeholders.
- Include Enforceability in EU Impact Assessments. Ensure that the enforceability of new EU rules is systematically assessed during legislative impact assessments, especially regarding non-EU traders and marketplaces.
- Expand the Commission's investigative powers across different legislation to initiate or take over investigations when certain criteria are met, for example, multiple Member States are affected, and develop digital enforcement tools and data-sharing mechanisms.
- Swiftly start the review of the Consumer Protection Cooperation (CPC) Regulation, strengthening the CPC framework to improve cross-border enforcement, transparency, and collaboration, and leveraging technology for efficient action against rogue traders. (see Joint Statement by BEUC, BusinessEurope and EuroCommerce)⁵⁸.
- Introduce an EU instrument to limit or restrict Union market access, especially for third-country traders and marketplaces in cases of persistent and serious non-compliance.
- Create a system of certified Authorised Representatives to ensure accountability, traceability, and enforceability, especially for non-EU products & explore extending their obligations.

⁵⁷ For example, unfair online competition and cross-border price distortions directly affect the viability of local shops. Dutch customers ordered more than €4.4 billion from outside the Netherlands, with China now the largest source. [De Ondernemersagenda Retail | Vakcentrum](#)

⁵⁸ [Restoring the level playing field in retail - EuroCommerce](#)

- Swiftly finalise the review of the EU Customs Reform Package.
- Streamline Extended Producer Responsibility (EPR) schemes across the EU via a digital one-stop shop to reduce administrative burdens and ensure fair contributions.
- Deploy the Digital Product Passport (DPP), increasing product compliance, supporting enforcement, ensuring interoperability with EU systems, and facilitating automatic compliance checks, while avoiding burdens on SMEs.

For more information, please see our campaign website: [#Compliance4All – Retailers call for a level playing field - EuroCommerce](#)

8. Simplify regulation and ensuring rules are proportionate and implementable

Regulatory burden remains a key challenge, particularly for SMEs operating in rural and remote areas. Operating at the end of the supply chain, exposed retailers and wholesalers to multiple rules applying to multiple products, that make the cumulative burden of both EU and national legislation crippling. This is especially the case when compounded by legal variations between countries and complex cross-border administrative burdens that deters expansion in the Single Market. This legislation can be implemented at the very local level, with results that are often disproportionate⁵⁹. Tackling gold-plating remains key.

We have produced a Better Regulation Checklist⁶⁰, which provides recommendations and examples on how to ensure EU laws are simpler and easier to implement in practice. The principles call for practicability, workability, capability, assessment of indirect effect, a competitiveness check, flexibility, inspection at the right level and avoidance of duplication. They are complemented by examples of lessons that can be learned from initiatives of the last Commission mandate.

In addition, we recommend rules that correctly allocate responsibilities, understand value chains, avoid unintended consequences by properly preparing and using Inter-Service Consultation, using AI tools to check the degree of variation between a proposal and the final text agreed by co-legislators, and to test the quality of impact assessments, incorporating coherence into digital-first policies and ensure they are technically feasible and capable of maintaining operational functionality, not leaving targets to a political decision, exercising restraint and consideration of how enforcement works in practice ahead of legislative proposals.

9. Enable investment

Retail and wholesale is at the forefront of change. Evolving consumer behaviour, the need to decarbonise the economy and new digital megatrends force it to keep pace in a dynamic, competitive, innovative and increasingly global market. This makes digital and sustainability transformation crucial, as well as investment in skills.

EuroCommerce with McKinsey estimated that retailers and wholesalers need to invest up to €600 billion between 2022 and 2030 to make the digital and sustainability transformation possible – and recruit, retain and equip people with the skills needed to support that transformation. This represents an additional investment of 0.8 to 1.6% of turnover per company up to 2030.⁶¹

⁵⁹ In the Netherlands, one third of the rules for a fashion shop were found to be unworkable and 20% of compliance requires external expertise. [De Ondernemersagenda Retail | Vakcentrum](#)

⁶⁰ [20260204-eurocommerce-position-call-for-evidence-better-regulation-final.pdf](#)

⁶¹ [Transforming the EU Retail & Wholesale Sector - EuroCommerce](#)

For SMEs, access to finance enables investment to improve the overall competitiveness of businesses. Support is needed to improve awareness of available funding opportunities, provide clear guidance, simpler access and fast lane procedures and ease the burdens and accountability/reporting linked to accepting public funds. Encouraging more national schemes that offer alternative sources of funding (e.g. voucher schemes, tax incentives, updates to guidance on crowdfunding) without excessive interest charges will enable this. As well as maintaining flexibility to negotiate payment terms.⁶²

10. Supporting retail and wholesale's competitiveness through EU action

Initiatives that will help retail and wholesale's competitiveness, and continued contribution to rural and remote areas include:

- **Ensuring a level playing field in the Single Market by stopping the use of territorial supply constraints.**⁶³

Territorial supply constraints are restrictions imposed by large multinational brand manufacturers which prevent retailers and wholesalers from making use of the Single Market. The use of territorial supply constraints is widespread across the EU and affects consumers in the form of higher prices and lower choice. Affordability remains a top concern for EU consumers when doing their shopping as the EU comes out of a cost-of-living crisis and is yet again faced with uncertainty driven by geopolitics.

Tackling territorial supply constraints is one of the top 10 terrible barriers in the Single Market.⁶⁴ Existing competition rules can only address certain types of territorial supply constraints. The Commission must therefore act and close the remaining legal gaps through dedicated Single Market legislation banning territorial supply constraints.

Eliminating territorial supply constraints will strengthen retail and wholesale companies, enabling them to continue to provide local jobs across the whole of the EU, including in more remote parts.

It will also support entrepreneurship. Retail and wholesale is composed of 99% SMEs. Several of these SMEs are organised in groups of independent retailers or are franchisees. More efficient sourcing in the Single Market from large multinational brand manufacturers would directly strengthen the competitiveness of these independent businesses, enabling them to offer better prices and a wider choice to consumers.

SMEs would also become more competitive as without territorial supply constraints, they would be able to directly seek out the best deal in the EU. SME franchisees and independent retailers would be better able to offer attractive prices or more choice, due to the negotiations on their behalf by the brand under which they operate. They also will benefit indirectly, if their wholesaler is able to get a better deal and they are able to offer SMEs a better price. This is important for those SME retailers that operate in border regions, whose customers are more willing to cross the border to shop. This threatens the viability of such SMEs, who, with the elimination of territorial supply constraints, would be better able to continue to provide local jobs, proximity and contribute to the livability of more remote areas, including older generations.

Note, this is just one of the Single Market barriers affecting retail and wholesale. We regularly update the EuroCommerce Single Market Barriers overview here: [Single Market Barriers Overview - EuroCommerce](#).

⁶² [Late Payments - EuroCommerce](#)

⁶³ <https://www.eurocommerce.eu/singlemarket4all/>

⁶⁴ https://single-market-economy.ec.europa.eu/publications/single-market-our-european-home-market-uncertain-world_en

- **Focusing the revision of the Unfair Trading Practices Directive on small farmers and SMEs.**⁶⁵

The retail and wholesale sectors play a vital role in the EU agri-food chain, ensuring that consumers have access to safe, high-quality, and affordable food. These sectors connect millions of consumers with food manufacturers and farmers, forming an essential link between food production and consumption.

The revision of the Unfair Trading Practices Directive must carefully assess impacts across the entire agri-food chain. This aims to improve the situation of farmers and small processors. Protecting farmers and small suppliers from abusive practices is essential. However, measures that unintentionally strengthen large manufacturers at the expense of retailers do not automatically benefit agriculture or consumers.

It is important to avoid disproportionate regulatory interventions that could weaken retailers' and wholesalers' ability to negotiate effectively, thereby undermining competitiveness, their viability in rural and remote areas, and limit benefits for consumers. However, many changes being discussed, such as removal of thresholds and regulating contractual practices between actors in the chain that will have no effect on the position of farmers, and will only benefit large manufacturers – limiting the freedom to negotiate for retailers, who have been proven by competition investigations and studies to pass on those savings to consumers.

The EU must refocus the Directive to protect small farmers and SMEs, rather than empowering large multinationals, ensuring existing rules are used before expanding them. A concise and clear set of both black and grey practices that do not interfere with market or price-setting mechanisms is the best way to protect farmers, without burdening consumers or undermining competitiveness.

Farmers face substantive challenges which require different responses and measures. A supply chain approach, grounded in open markets, cooperation and dialogue, delivers more to farmers than regulation of unfair trading practices.

- **Ensuring the role of retail and wholesale is recognised in the Circular Economy Act.**

The Circular Economy Act should also be viewed in the broader context of EU actions aimed at enhancing competitiveness. Any effective EU competitiveness strategy needs to look beyond manufacturing and include the whole supply chain and the services sectors. As key partners of value chains, retail and wholesale are ideally placed and needed to help implement and coordinate solutions along the value chain to offer custom solutions to customers. It is of crucial importance that our sector is consulted and involved in drafting the Circular Economy Act.

- **Tackle the problems that arise from the imbalance of power with payment schemes.**

Payments are an essential part of the shopping experience of customers when visiting our stores, apps and web shops. The rising costs of accepting debit and credit card payments as well as account-to-account based payment are not affordable to SMEs who lack expertise and scale to effectively negotiate terms. The supply side of payments is highly concentrated leading to abusively high fees that are not justifiable in terms of value for SMEs.

This requires:

- The EU to stimulate and strengthen European payment methods such as instant payments and the digital euro, provided the applicable fees are attractive to SMEs.

⁶⁵ [Unfair trading practices directive - EuroCommerce](#)

- Ensure that existing card based payments are not simply mimicked for instant payments and the digital euro, for example on fee structures and dispute management.
- The EU to complete its investigation into Visa’s and Mastercard’s abuse of their position leading to overly high and untransparent card scheme fees.
- The EU to ensure that the improved transparency of card scheme fees under the upcoming Payment Services Regulation is cascaded down to SMEs/merchants.
- The EU to remind Member States that a complete surcharging ban on payments means that consumers using expensive payment methods are effectively subsidised by those that use cheaper payment methods.

CONCLUSION

The right to stay depends on the **presence of vibrant local economies and accessible services**. Retail and wholesale are fundamental to both.

In rural and remote regions especially, the sector:

- Sustains **jobs and livelihoods**
- Ensures **daily access to essential goods**
- Anchors **community life and territorial cohesion**

A **failure to support the sector risks accelerating depopulation and regional decline**, undermining EU cohesion and competitiveness.

EuroCommerce therefore urges the European Commission to **place retail and wholesale at the centre of the Right to Stay Strategy**, ensuring that all regions—regardless of geography—remain **liveable, connected, and economically viable places for citizens to call home**.

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EuroCommerce is the principal European organisation representing the retail and wholesale sector. It embraces national associations in 28 countries and 5 million companies, including leading global players and many small businesses. Over a billion times a day, retailers and wholesalers distribute goods and provide an essential service to millions of businesses and individual customers. The sector generates 1 in 7 jobs, offering a varied career to 26 million Europeans, many of them young people. It also supports millions of further jobs throughout the supply chain, from small local suppliers to international businesses. EuroCommerce is the recognised European social partner for the retail and wholesale sector.