
Deutscher Industrie- und Handelskammertag

Position Paper on the Proposal for a Regulation of the European Parliament and of the Council setting out the conditions and procedure by which the Commission may request undertakings and associations of undertakings to provide information in relation to the internal market and related areas (Single Market Information Tool, SMIT, COM(2017) 257 v. 2.5.2017) – Courtesy Translation

Who we are:

The Association of German Chambers of Commerce and Industry (Deutscher Industrie- und Handelskammertag e.V. – DIHK) is the umbrella organization of the 79 German Chambers of Commerce and Industry. It represents the collective interest of German business. Our legitimation rests on more than 3.6 million member companies from all sectors, regions and sizes that are by law members of a Chamber of Commerce and Industry (exempted are crafts, liberal professions and agricultural businesses). The DIHK also coordinates the network of the 130 chambers of commerce abroad, delegations and representative offices of German business in 90 countries worldwide. It is registered in the transparency register of the European Commission (No. 22400601191-42).

Summary

The DIHK is of the opinion that the necessity of a "Single Market Information Tool" must be examined in its entirety. At national and EU level, many data are collected by public and scientific bodies as well as by business associations. If the existing data are not sufficient for the specific aim, it is important first to improve the data collection and the processing of existing information before creating new burden for companies. It is also not clear what advantages a compulsory disclosure of information could have compared to the strengthening of voluntary cooperation especially with business associations, which exists already and works very successfully. Voluntary participation of the undertakings in information requests by the Commission would in any case be a less restrictive measure.

The additional bureaucratic burden, risks and disadvantages clearly outweigh potential benefits of the proposal. In any case, the instrument could only be used as a last resort if the information cannot be provided in any other way. The scope should be limited by precise conditions; the comprised information should be substantially restricted. In general, it should be clarified in which cases a "simple request" and in which a "decision" will be taken. A tiered approach, in which, first, a simple request for information will be issued, could be more appropriate and less restrictive.

Furthermore, it must be ensured that companies are not overstrained by new reporting requirements. Small and medium-sized enterprises should not be subject to information requests. Personal data and business secrets must be adequately protected. Enterprises should have the right to reject requests concerning protected information. The sanctions should be deleted or, at least, the high level should be reduced, particularly because information requests could also be submitted to uninvolved third parties whose conduct is not directly related to an internal market disturbance.

I. Preliminary remarks on the necessity of the instrument and alternatives

The DIHK supports, in general, the strengthening of the internal market as proposed by the EU Commission (see position paper on the [Single Market Strategy](#) of 18th April 2016). It is understandable that adequate qualitative and quantitative data on the internal market are necessary to improve the capability to promote the undisturbed functioning of the internal market. Nevertheless, the DIHK is concerned about the additional information requirements which may result for companies from the Commission's requests. The DIHK also doubts that they are necessary to improve the functioning of the internal market.

According to the Commission, the objective of the instrument is to improve the application of EU internal market rules by the Member States and to monitor and enforce this more effectively by the Commission (recital 14, p. 3 of the explanatory memorandum). To this end the data situation shall be improved, also for infringement proceedings before the ECJ (recital 3). In addition, the information shall be used for Member States' enforcement measures (recital 14). At the same time, however, the information shall not be used against the undertakings, which are providing the information (recital 12). The reasoning is, thus, contradictory, since the Member States' enforcement measures would affect the undertakings. Moreover, according to the Commission's plans, the information shall help in designing regulatory measures (recital 14). With regard to the information requested, such as the cost structure and price policy, this could even lead to price regulation.

In the end, it remains unclear for what purposes the Commission shall be entitled to collect and use the information. The Regulatory Scrutiny Board (RSB) also criticized this in its two opinions (see Impact Assessment, SWD (2017) 216, p. 53, 55). Considering the intensity of the intervention, the Commission does not adequately demonstrate the purpose and value of its proposal. If the objective is not clearly identifiable, as in this case, the means is not proportionate. This leads to the illegality of the legislative measure. If the standards of jurisprudence on information obligations in antitrust law are applied to the information requests proposed here, hardly a constellation is conceivable in which a request for information would be legal. This justifies the assumption that the information tool is rather a so-called "fishing-expedition-tool" in which deficits or unlawful acts are assumed without reasons.

At the same time, a vast amount of data is already available at national and EU level. Furthermore, there are already numerous reporting requirements for companies. Corporations are, in any case,

obliged, for example, to publish their annual financial statements. The (consolidated) annual financial statements are published in Germany via the Federal Gazette (Bundesanzeiger). Larger capital market-oriented corporations, banks or insurance companies are subject to additional complex reporting requirements, for example on CSR. In addition, many companies provide information via their annual reports, sustainability reports etc. – often on the Internet. Moreover, there are many information requirements based on specific laws. Many data are also collected by statistical bodies at national and European level, scientific bodies and associations. This existing infrastructure and the expertise in the generation and evaluation of questionnaires as well as in the collection and evaluation of data are valuable, also for the enforcement of internal market law. It is therefore important to ensure that these existing data are used more effectively.

This also applies to data not collected by official statistics, but already available to tax offices, employment administrations, customs authorities or pension and social insurance authorities. Unless there are specific secrecy interests with regard to sensitive information which must be considered prior to submission, the multiple use of data would relieve the companies and increase the acceptance of statistical obligations. The “Once Only Principle” is fundamental and path-breaking – also from the Commission's point of view (see, for example, the EU eGovernment Action Plan 2016-2020 of 19th April 2016, COM (2016) 179, p. 3, and the "Once Only" Principle Project, <http://toop.eu/>). The use of these synergies is preferable to setting up parallel instruments for the collection of data. It is unacceptable that data is collected again from companies, rather than compiling existing data. Article 337 TFEU as the legal basis of the directive also requires that the information must be necessary. It is not enough that the information is useful. It must be indispensable. This condition is met only if the data have not yet been collected; it is not fulfilled if the data are available in a different form – possibly also aggregated.

If the Commission considers the already collected and available data as not detailed enough or not up to date and, therefore, not meaningful for the specific objective, it must justify this well. A mere delay in time by the need to collect information from the Member States and other bodies is not sufficient to require undertakings to re-deliver. It would be extremely doubtful, on the political front, to let companies pay for the fault of Member States that do not deliver information adequately and timely. Moreover, it is more efficient and complies with the principle of proportionality and the principle of subsidiarity to enforce the right of information against the Member States, rather than to request the information from the enterprises again. Furthermore, it should have priority to review and, possibly, reform the organisation of the collection of data in the Member States and at European level as well as to improve Eurostat before setting up further instruments. Moreover, as the Commission writes (see page 6), the cooperation between the Member States and the Commission should be improved. Unfortunately, the proposal does not contribute to this.

It would also be important to intensify the dialogue with business associations, which have a lot of data and further experience available. Over the last few years, the DIHK has regularly informed the EU Commission about the obstacles in the internal market (see only the surveys on trade in [goods](#) and [services](#) and on [obstacles to investment](#)). Other industry associations also do this. The cooperation has proved to be very fruitful, especially as this is a less burdensome alternative for

companies. It is not clear which advantages compulsory disclosure of information on the part of the companies as well as on the part of the associations should have against the expansion of this voluntary cooperation.

The introduction of a direct information tool between the EU Commission and the companies could also create the risk of circumventing stakeholders which are institutionalised under national law, such as the Chambers of Commerce and Industry. This is particularly problematic because larger companies with sufficient capacity to handle information requests can better present their interests. Their voice could be too heavily weighted against small and medium-sized businesses. The exchange with representative business associations, on the other hand, would reduce burdens on companies and at the same time lead to a higher degree of representativeness of the information.

Finally, the principle of subsidiarity under Article 5 (3) TEU might be violated. It is the responsibility of the Member States to implement EU law and to collect the necessary data for this purpose and, if necessary, make it available to the Commission. To this extent, data are already available to a large extent. If the information, which is available to the Member States or can be acquired by them, is sufficient, there is no need under the principle of subsidiarity to introduce Commission's requests for information, which would be, therefore, illegal. The Commission interferes intensively into this existing system without sufficient justification. An additional independent "data collection point" at the Commission is not justified.

II. Comments in detail

If the Council and the Parliament should decide in favour of the Single Market Information Tool, in spite of the doubtful use, suitable alternatives and the feared disadvantageous consequences for companies, at least substantial revisions to the Commission draft would be necessary, which are described in detail below. Moreover, the proposal for a regulation has many technical deficits so that – beyond these remarks – the draft would have to be completely revised in terms of language, content and formal aspects. This concerns, for example, the question of which aspects should be included in the text of the regulation and which should be included in the recitals or the explanatory memorandum. Recital 12 contains, for example, many aspects of a reasoning and is formulated very colloquially. The subject of extended deadlines belongs in Chapter II. A complete list of these deficiencies would go beyond the scope of this position paper.

1. More restrictive conditions: only as last resort

It should be ensured by very restrictive requirements in the text of the regulation itself that the information requests are used only exceptionally and as a last resort as well as solely for the elimination of serious internal market disturbances.

Firstly, the instrument should only be applied if the EU Commission has reason to believe that there is a serious problem in the internal market, which can be solved with the help of the information

requested. The Commission should, in such a case, explain how the information can serve to clarify and eliminate a disturbance in the internal market.

However, Article 4 of the draft merely requires that a “serious difficulty with the application of Union law risks undermining the attainment of an important Union policy objective”. This does not even ensure that there is any disturbance of the internal market. Any objective of the EU or provision is sufficient, irrespective of whether it relates to the internal market or whether the functioning of the internal market is actually disrupted. The requirements are, thus, once again significantly reduced compared to the original plans.

Moreover, the terms of an “important Union policy objective” and “serious difficulty” are very vague. They are thus not suitable for clearly determining the requirements of an information request. On the contrary, they create a high degree of legal uncertainty for undertakings and are contrary to the principle of legal certainty which follows from the rule of law. They give the Commission a too wide margin of discretion, which is not appropriate in view of the intensity of the interference. Furthermore, the judicial review is not guaranteed. An exact definition of the conditions for the use of the information request – also in the legal text itself, not only in the recitals or explanatory memorandum – is urgently necessary in order to reduce the danger of an excessive application. A gradual expansion of the requests should also be avoided.

Secondly, it is not ensured that the information requests are actually used only as a last resort to obtain the information. Information which is available at European or national authorities, statistical offices, scientific bodies and associations and sufficient for the purpose of the investigation should not be allowed to be requested directly from the undertakings by means of information requests from the Commission. The Regulatory Scrutiny Board explicitly requested this in its two opinions (see Impact Assessment, SWD (2017) 216, p. 53, 55). However, Article 5 (1) merely requires that the information available to the Commission is “not sufficient” or not “adequate” or that it cannot be obtained “in a timely manner”, for example because they are not accessible via a publicly available source or have not been provided by a Member State. The terms “sufficient” and “adequate” are also very unclear. They could be regarded as fulfilled from the Commission's point of view, for example, when the published information does not correspond exactly to the same time periods or parameters. In addition, the information request should be enforced against the Member State concerned, rather than gathering the information again with the undertakings. Again, the principle of legal certainty requires a more precise regulation.

Third, the instrument may only be used in extreme cases. In order to minimise the burden on business, its need should be critically reviewed in each individual case. However, the current draft regulation does not clearly state that the instrument shall be applied only in exceptional cases. Only in recital 20 it is mentioned that it should be limited to such situations. Thereby, the draft goes beyond the announcements in the context of the consultation, according to which information requests should not be routine, but only allowed in particularly important cases of cross-border internal market disturbances. Even if the Commission is currently expecting only five cases per year: The planned conditions cannot guarantee this. The alleged understanding as last resort is, in fact, not implemented in the text of the regulation.

2. Restriction of the substantive scope

The substantive scope of the proposal has also been significantly extended by the Commission's proposal. The internal market would, in any case, create a very broad scope. Now, the areas of agriculture and fisheries, transport, environment and energy are also explicitly covered (Article 2). It might be useful to clarify that these areas may also be touched if there are internal market disturbances. But the draft regulation does not specify that there must be still an obstacle to the internal market. Rather, it must be expressly stated that the aim is to improve the functioning of the internal market. Otherwise, the instrument would be endlessly wide and unlimited. It would be equivalent to a general right of the Commission to claim information from undertakings. However, according to Article 337 TFEU, the Commission may only request information if this serves to fulfil its tasks. To require a relation to the Commission's tasks follows from the principle of proportionality. This must be taken into account particularly in the light of the fundamental rights concerned.

3. Restrict the types of the information

The proposal itself does not in any way restrict the types of information which the Commission may require. Only a few examples are mentioned in recital 11. Thus, it is not foreseeable for companies which types of information may be covered. Moreover, these examples are very broad. Included are "factual market data" including cost structure, pricing policy, products or services characteristics or geographical distribution of customers and suppliers. These data are often highly sensitive to enterprises; it can be business secrets. Therefore, the principle of legal certainty must be strictly observed. The text of the regulation itself has to be much more specific on the question which kind of information can be requested.

Moreover, it is not unproblematic that fact-based analyses of the companies or associations shall also be covered, for example in relation to perceived regulatory and entry barriers or to costs of cross-border operations. Analyses also contain subjective elements and evaluations. This is not a "mere data material". Evaluations, for example on the existing circumstances and the future development opportunities, as well as the objectives and intentions of the companies concerned (for example, concerning the future development of the business) do not fall under the concept of information within the meaning of Article 337 TFEU which merely concerns information on facts. Also in this respect the text of the regulation has to define much more clearly which information can be requested in which form.

At the same time, it is necessary to ensure that the undertakings or associations of undertakings selected by the Commission for the purpose of the request (including sample-by-sample) are actually representative. This must also be stated in the text of the regulation (see recital 12 of the new State Aid Procedural Regulation 2015/1589/EU). At the same time, it is doubtful whether the Commission is capable to make a representative selection of undertakings at all. The fact that the Commission itself expects the instrument to be restricted to 'large companies' (p. 10 of the explanatory memorandum, see also recital 12) shows that the Commission has doubts in this

respect. A mistakenly selective selection – which is not accessible to judicial review – would give serious doubts as to the reliability of the results.

4. Unbureaucratic design

If the proposal should not be completely withdrawn, the requests for information should at least be designed as unbureaucratic as possible. Already now, undertakings in the European Union are subject to extensive information and reporting requirements. The EU Treaties provide explicitly in Art. 338 TFEU that statistics shall not entail excessive burdens on economic operators. On the basis of the general principle of proportionality, the same applies to information requests which are introduced on the basis of Article 337 TFEU. The costs imposed on the parties concerned must, therefore, not be disproportionate to the relevance for the generation of information (see also ECJ, Case C-426/93 [1995] ECR I-3723, paras 42 et seq. – Germany/Council – Company Register).

The introduction of the Single Market Information Tool in its planned form would lead to considerable additional costs and costs for companies. The estimations of the Commission of up to EUR 2,000 per SME is not insignificant and puts a considerable burden on undertakings. The costs for large companies are estimated even to be four times as high, according to the draft; that means 8,000 euros. Furthermore, it is questionable whether the expectations concerning the legal aid costs for SMEs of 1,000 euros are realistic. In the context of the consultation higher costs were expected (see Impact Assessment, SWD (2017) 216, p. 59). Particularly in cases, where the undertaking is obliged to give reasons for confidentiality, the costs are likely to be higher, because the effort and the expenditure of time are large. Also for these reasons mandatory information requests should be avoided.

In addition, companies are required to provide information without own misconduct (concerning the internal market). The undertakings are, therefore, regularly uninvolved third parties. Instead of a compulsory instrument, it should be examined whether a legal basis for a voluntary information inquiry could be created.

Moreover, it should be explicitly clear, in addition to the provisions of Article 5 (3), that undertakings are not obliged to collect data in a cumbersome operation, for example within a complex group. It must be made clear that companies do not have to prepare the information in a specific way for the Commission so that it can make better use of it and match it with other companies' information. They are not obliged to use a certain file format or a certain structure of presentation. It is the task of the Commission, to prepare the information in a way which makes a comparison possible. This task cannot be passed on to the undertakings. Article 5 (3) should therefore be formulated in such a way as to make it clear that undertakings may make the information available to the Commission in the manner in which they exist.

In the case of information requests directed at associations of undertakings, special attention must be paid to the limited availability of data on specific topics. Where the association does not conduct certain statistics or analyses, it cannot be obliged to do so by means of information requests.

Otherwise, they would have to require the necessary information from member companies, which would lead to considerable burdens for the associations as well as for the companies.

Furthermore, the requirements to submit the data in a clear, complete and accurate manner (Article 7 para. 1) may not be understood too strictly. They must be only as clear, complete and precise as they are present in the companies. If data could theoretically be collected but, in fact, is not, for example due to lack of specific relevance for the company, there cannot be an obligation to provide information. The regulation should be formulated accordingly. Moreover, the requirement of "proportionality" in Article 5 (3) (2) is not phrased precisely, also because there are no criteria for the balancing exercise. When considering whether a request for information is proportionate, there should be a comprehensive balance of interests between the internal market objectives on the one hand and the burdens on the other. The costs for the companies concerned must be calculated in advance and taken into account when weighing the interests. This examination may not be carried out in a general way but must take account of the circumstances of each individual undertaking concerned. The provision should be supplemented accordingly.

5. Clarification of simple information requests and such by decision

In general, it should be clarified when a "simple request" shall be made and when a "decision" shall be taken. This is a fundamental decision because it determines the requirements, the procedure and the remedies. The procedural rights of the undertakings must be sufficiently taken into account and the principle of proportionality must be respected. A step-by-step procedure, in which, first, a simple request for information is made, might be more appropriate. Especially in cases where business secrets are concerned, this would provide the opportunity to find a middle path without immediate threat of sanctions. This could respect the interests of the Commission as well as the secrecy interests of the undertakings. It should be made clear that simple requests do not create an obligation to supply information. Furthermore, the deadlines for the transmission of information must be sufficiently long and extended at the request of the undertakings, both in the case of "simple requests" pursuant to Article 6 (2) and when a decision pursuant to Article 6 (3) is adopted.

6. Exemption for SMEs

According to the European SME test the burdens on SMEs in particular are to be scrutinised and kept as small as possible (see, for example, the Commission's Communication on the "Small Business Act for Europe", 25.6.2008, COM (2008) 394, p. 10). SMEs should therefore be exempted from the scope of additional requirements. This applies in particular to information and reporting requirements, since even small enterprises with up to 50 employees usually have only a small administrative department which would have to assume such information obligations, which would lead to a disproportionate effort.

According to Art. 6 para. 3, however, only micro-enterprises within the meaning of Directive 2013/34/EU are excluded from the scope of application. This concerns companies with a maximum

balance sheet of 350,000 euros, a net turnover of 700,000 euros and 10 employees. SMEs, on the other hand, are not excluded. The explanatory memorandum of the proposal makes clear that only large companies of information are likely to be affected (p. 10). However, this limitation must also be made in the text of the regulation, by drawing the limits on the applicability of the instrument higher than it is currently the case. Otherwise, the aim to reduce bureaucracy, as formulated by the EU Commission, would not be achieved, especially with respect to SMEs. An exception for small groups must also be examined.

7. Data protection and protection of business secrets

When designing and implementing the Single Market Information Tool, it is important to ensure that the data protection requirements are respected and that business secrets are never published. This is particularly relevant because sensitive data are also covered, for example on cost structures, price policy and employment contracts. These data affect the competitive position of a company. In order to protect these data, the EU Commission is already obliged to comply with Article 16 (1) and Article 339 TFEU; this applies in particular to “information about undertakings, their business relations or their cost components”.

Particular confidential treatment needs, for example, information about economic potentials and risks, future business development, planned company strategies, relationships with other companies, customers and suppliers, financing questions, entrepreneurial and technical know-how or tax burdens. This information is of great interest to (potential) competitors and its publication would create a significant risk of financial losses for the economic operator concerned. The results of the consultation confirm this: Over 80% of the participating companies refuse to provide information on such aspects as cost structures, price policy, details of contracts with business partners and business strategies (Impact Assessment, SWD (2017) 216, p. 60).

In addition, private individuals may be subject to obligations of professional secrecy, for example lawyers, notaries, tax consultants, auditors or doctors (see, for example, ECJ, Case 155/78 [1980] ECR I-1797, para 16 et seq. – M/Commission). Also data of employees cannot be collected and passed on without restrictions. Furthermore, associations cannot be required to submit not published analyses and internal assessments.

In spite of these high requirements, Article 7 guarantees only a very limited protection of business secrets. Even confidential information must be disclosed to the Commission. A version without the confidential information can be added for further use; however, the company must provide a detailed explanation of the interest in secrecy (Article 7 (2) 2). There will, thus, be a reversal of the burden of proof to the detriment of the companies. In addition, the costs for the companies significantly increase because of the need to deliver a second non-confidential version, also because a well-founded justification needs to be given concerning the sections with sensitive data.

Finally, the Commission decides whether it considers the information to be confidential or not (Article 4). It may request, store, use and even disclose the information to a Member State

concerned by an infringement procedure – also against the company's intention (Article 7 (3), Article 8). This completely disregards the companies' interests in the secrecy of their business data. The Commission has not adequately taken into account the concerns expressed by the companies and associations in the context of the consultation. The companies are expected to fight for the confidentiality of their business secrets, if necessary by judicial means. This is all the more problematic as legal protection can be obtained only before the ECJ, so that a procedure is associated with high legal costs.

In the view of the DIHK this is not consistent with the EU directive on the protection of business secrets 2016/943/EU. By adopting this directive the European legislature has just emphasised the importance of an appropriate safeguard mechanism for companies in the internal market. It should not itself help to risk this protection.

Instead, companies should be entitled to reject information requests if they concern company secrets. They themselves can predict much better which information might put their business at risk if they reach the public. In addition, the information provided should not be used in subsequent proceedings against the undertakings themselves. The obligation to provide information must not lead to companies having to accuse themselves. Therefore, requests for information should be inadmissible if the undertakings concerned would be forced to accuse themselves. A misconduct needs to be substantiated by the Commission. Otherwise, this would infringe the privilege against self-incrimination and the right of defense (ECJ, Case 374/87 [1989] ECR 3283, para 34 et seq. – Orkem/Commission; CFI, Case T-34/93 [1995] ECR II-545, para 74 – Société Générale). It would make sense to interpret the right to refuse to disclose information in accordance with the jurisprudence of the European Court of Human Rights (ECtHR, 25.2.1993 – Case 10828/84, para 41 et seq. – Funke; 17.12.1996 – 19187/91, para. 68 – Saunders).

There must also be effective legal protection. To this end, it would also have to be ensured that appeals against information have suspensory effect. This is even more important because of the sanctions for not respecting deadlines. It is currently unclear how this can be ensured. If this cannot be guaranteed, companies may not be legally required to disclose business secrets.

In addition, the limits of national and European reporting requirements should also be taken into account when designing the Single Market Information Tool. If public authorities are prevented from collecting certain data or providing information to the Commission on the basis of national and/or European laws, the protection function of these regulations cannot be circumvented directly via information requests against companies.

Finally, it must be ensured that the information communicated to the Commission is preserved safely. In particular, it must be protected against data spying and economic espionage. Furthermore, it is necessary to exclude an obligation of transparency of the Commission towards third parties on the basis of the transparency regulation 1049/2001/EC. This regulation gives citizens and companies the right to access commission documents. In the case of transfer to other bodies, Member States, the ECJ or third parties, the company should first be consulted, even if the data are aggregated. Particularly in the case of a few market participants, it is often possible to draw

conclusions concerning individual companies from aggregated information. In addition, if the requested information is published business partners or competitors from third countries could obtain information about average cost advantages from aggregated information, for example in the context of contractual negotiations. A judgment from July (ECJ, Case C-213/15 P – Commission/Breyer) provides doubts as to how it can be ensured that the Transparency Regulation does not create such an individual right. Without this being excluded, companies may not be required by law to deliver business secrets to the Commission.

8. No sanctions

The penalties provided for by the regulation in the event that the respondents do not respond adequately, incompletely or not in a timely manner to the request for information have to be deleted. The fines of up to five percent of the daily turnover or one percent of the annual turnover are much too high. This is all the more true because there are also such companies concerned, which have nothing to do with the internal market disturbance itself. In particular, in the case of simple requests which are non-binding, sanctioning is disproportionate in the case of incorrect or misleading information, even if intentional or grossly negligent conduct are required. Moreover, the reference point of turnover does not take account of the fact that profit margins differ widely in different sectors. In sectors with low margins, the fines would be particularly significant. This provision should at least be mitigated, if not deleted.

Also the publication of decisions on fines in the Official Gazette (Article 15 (2)) should be deleted. It seems as if pressure shall be created here to force the companies to cooperate. It cannot be excluded that such publication could have a negative impact on the reputation and business of the company concerned. Again, the principle of proportionality should be taken into account. The company may have nothing to do with the internal market disturbance. Perhaps it "only" did not fulfil its obligation to provide information.

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