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**Market surveillance
from manufacturer
perspective**

—
DMÜK 2025

2025-09-18
André Malitte (BSH COS-TA)



*„We call for a strong market surveillance.
Market surveillance must be powerful and efficient.“*



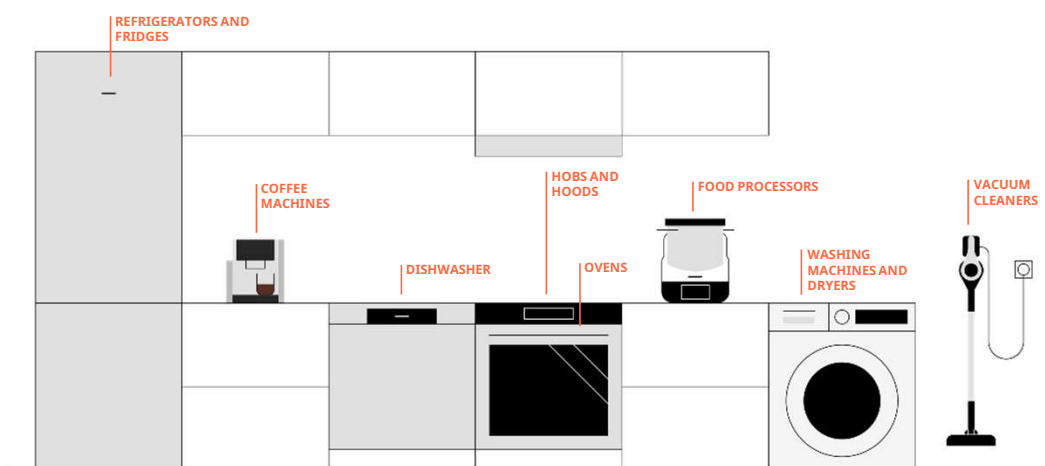
Content of the presentation

1. Overview BSH
2. Flood of regulations as a sporting challenge for manufacturers and authorities
3. Practical experience with market surveillance
4. Common topics 2025ff. (DPP, eCommerce, AI)
5. Conclusion

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Our Purpose: We Improve Quality of Life at Home



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Our Brands

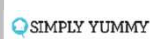
Home Appliance Brands



Eco-system Brand



Service Brands



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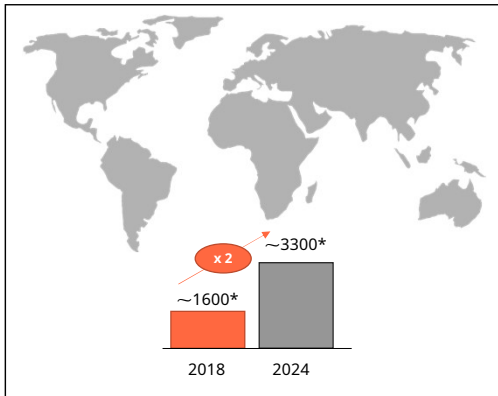
„Some requirements are challenging even for strong companies.“

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Regulations and standards for home appliances have doubled since 2018, globally

Number of new regulations in target markets



Complexity increased

- **Number** of regulated topics
- **Diversity** (EU, national, individual states)
- **Level of detail** in the provisions
- **Ambiguities** (especially in the case of missing standards)

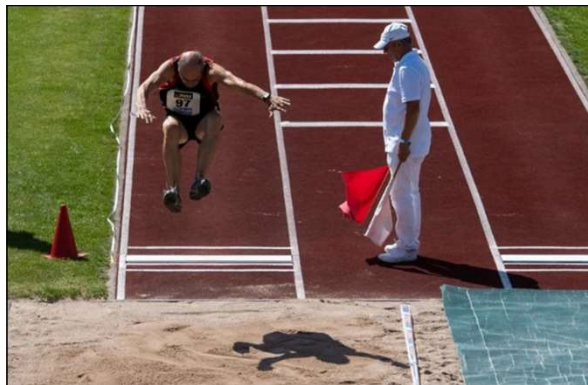
In addition, increasing **short-termism**

- In **announcements, deadlines** and late **clarifications**
- For **new projects** and **revisions**

* Evaluation of new entries per year in regulation databases for household appliances, globally

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*„Hard training
and great performance
often meet control of details.“*

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Market Surveillance Statistics 2024 – Management Summary

Facts

- In total **more than 300 Market Surveillance Requests** to BSH in **2024**, similar high level as in 2023
 - Region **Europe** **120**
 - Region **Emerging Markets** **150**
 - Region **China** **40**

Observations

- **All cases have been successfully completed**, but
 - the **effort** to answer and clarify the requests has **increased** due to
 - an **increasing level of details and complexity** of the requested information.
- MSA requests **focus on checking formal compliance, more intensive checks of website content**
- **Starting point for requests is often an online offer (Webshop, eCommerce)**
- Number of **laboratory tests increased slightly** in Europe

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Region REU (+CH): Number of requests – year 2024



- **120 requests in 2024**
- **High number in 2025 so far**

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„Same knowledge and understanding of new rules is key.“



Common topics in 2025ff. – A lot of!

Wood Flame retardent **Transparency** **Artificial Intelligence**
 Reporting Packaging Information on websites Geo political tensions
 Trainings Environmental Topics Responsibilities Role clarity
DPP Eco-design PFAS Repairability Index Critical raw materials **Data**
 Cybersecurity **Ensure Market Access** Handling global topics
 Malamud Case **ESPR** ProCodex Be ahead Single State Regulations
 Repair Index Standby Ban of EPS Complexity Processes **QR Code**
 Food Contact Drinking Water Refurbishment Detergents
 Material compliance Energy Label Circular Economy Revision NLF
 Labeling 3rd party Certification Packaging Waste Battery Regulation
Market Surveillance

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Promote justified Data Transparency – Step by step approach following clear priorities
Real benefit for consumer and society as well as need to know principle are key.



- Challenge legislative requirements increasing **pure bureaucracy without creating real added value**
- **Less is more: proceed step by step, requesting data & reports by priority**
- Examples for home appliances:
 - **Use existing Databases first** (EPREL, SCIP, etc.)
 - Expand to new „DPP“ data only where urgently needed
- **In any case: Avoid publication of confidential product data and organisational information**

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Demand for an Enforceability Assessment

New EU harmonisation legislation should undergo an improved impact assessment.

- **New Regulation is only as good as its enforcement.**
- Without ensured sufficient market surveillance, no new Regulation should be approved.
- During elaboration and the drafting period for the NLF 2.0 the need for an intensified **Enforceability Assessment** should be proposed.



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Moving towards a Pan-European Market Surveillance Organisation

Better coordination of activities can bundle MSA power and support a level-playing field



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"A level playing field and same rules for all."

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THANK YOU for
your continuous
support and for
FAIR PLAY

—
No success without
Market Access &
Market Surveillance

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