

# A strong European policy to support Small and Medium-sized enterprises (SMEs) and entrepreneurs 2015-2020

## Public consultation on the Small Business Act (SBA)

Fields marked with \* are mandatory.

### Introduction & background

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Since its adoption in 2008, the Small Business Act (SBA) has proven its worth as a policy tool in support of the small and medium enterprises (SMEs). Various initiatives have been taken at both EU and national level to improve the environment in which these businesses operate and help them grow.

It is now time to reflect on what can be done in the years that lie ahead to make life easier for SMEs.

The Commission has drafted a consultation document including the on-going measures and the new proposals (see the link below).

This consultation is designed to collect feedback on the new initiatives set out in the consultation document.

**Please read it before you complete the questionnaire.**

[Consultation document](#)

### 1 - About you

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1.1 - Are you replying as/on behalf of:\*

- ☐ An EU citizen
- ☐ An individual company
- ☒ A national business organization
- ☐ A European business organization
- ☐ A national authority
- ☐ A regional authority
- ☐ Other

1.1b Are you registered on the Transparency Register?\*

- ☒ Yes  
☐ No

1.2 - Please give your name/ the name of the company/organization/authority\*

The Federation of Finnish Enterprises

1.3 - Please give your e-mail address

antti.neimala@yrittajat.fi

1.4 - Your country\*

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

1.5 - How do you want your contribution to appear on the Commission's website?\*

- ☒ **Under the name supplied** (I consent to the publication of all information in my contribution, and I declare that none of it is subject to any copyright restrictions that would prevent publication.)
- ☐ **Anonymously** (I consent to the publication of all information in my contribution except my name/the name of my organisation, and I declare that none of it is subject to any copyright restrictions that would prevent publication.)
- ☐ **I do not want my contribution to appear - please keep it confidential** (It will not be published, but used internally within the Commission.)

## 2 - Reducing the administrative burden

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2.1 How important is a new EU regulation on regulatory simplification, designed to ensure the following in all EU countries?

	Very important	Important	Less important	Not important at all
Setting up a company at a maximum cost of €100 & within 3 days*	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Obtaining the licenses needed within 1 month*	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Making the application of the "SME Test" or an equivalent system mandatory in all EU countries*	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring that national laws provide for a discharge within 3 years at most for entrepreneurs who have gone bankrupt*	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

2.2 - An EU-wide campaign to cut red tape for SMEs is\*

- ☒ Very useful
- ☐ Useful
- ☐ Not very useful
- ☐ Not useful at all

2.3 - Explore the possibility of lowering the transaction costs/fees for SMEs to facilitate their access to industrial and intellectual property is\*

- ☒ Very useful
- ☐ Useful
- ☐ Not very useful
- ☐ Not useful at all

2.4 - Improving consultation at an early stage of SMEs (and the organizations representing them) about burdensome legislation, focusing on implementation procedures at EU and national level, is\*

- ☒ Very useful
- ☐ Useful
- ☐ Not very useful
- ☐ Not useful at all

2.5 - Encouraging EU countries to simplify tax procedures for new companies in their start-up phase to reduce administrative burdens and help them develop faster is\*

- ☐ Very useful
- ☐ Useful
- ☒ Not very useful
- ☐ Not useful at all

2.6 - Identifying and addressing bottlenecks in national legislation which impede SMEs to grow is\*

- ☒ Very useful
- ☐ Useful
- ☐ Not very useful
- ☐ Not useful at all

## 2.7 Any further suggestions or comments?

*1,500 character(s) maximum*

To begin with, FFE would like to emphasize that SBA has taken the SME-agenda forward at the EU-level, and also nationally. FFE sees that there is a need to take SBA to the next level.

As regards the consultation questionnaire, we feel that there should have been some open questions covering the core issues of the SBA: how has it worked as a whole; are the 10 principles still current today as they are; should Entrepreneurship 2020 Action Plan be merged into SBA and so on. Now the Commission has chosen a different approach: there are 5 chosen areas that are covered by the questionnaire. The pre-selection has been made by the sme-envoy Network. We do not see that the Network represents such political powers that this kind of priority setting would be acceptable. The Network has an important role as regards enforcing the SME-agenda at both EU- and national level, but defining SME policy priorities cannot be the Network's duty.

When it comes section "Reducing the administrative burden", we would like to emphasize these points: Absolute targets on dates and expenses are simple and tangible, and that is why they are so tempting. It is true that measurable targets are needed. However, the most important policy objective should always be Think Small first. If all processes applied this principle properly the quality of legislation would improve significantly.

We also point out that many questions are ambiguous. An example: "an EU wide campaign to cut red tape" - definition?

## 3 - Access to finance

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3.1 - Strengthening the venture capital market in Europe (through legislation and by other means), so as to attract private institutional investors back to the markets, is\*

- ☒ Very useful
- ☐ Useful
- ☐ Not very useful
- ☐ Not useful at all

3.2 - Mobilising all the funds allocated to the financial instruments under COSME so that at least 220 000 SMEs in the EU benefit from improved access to finance (EU-supported venture capital funds, guarantees and counter-guarantees) is\*

- ☐ Very useful
- ☒ Useful
- ☐ Not very useful
- ☐ Not useful at all

### 3.3 How important are the following initiatives in developing alternative sources of finance?

	Very important	Important	Less important	Not important at all
Removing obstacles to crowd-funding & raising awareness about its risks and benefits and how SMEs can access it (through information, events, forums for those potentially interested, etc.)*	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further developing & spreading mezzanine financing (hybrid, i.e. debt/equity, form of financing) by sharing best practices & setting up discussion forums on the subject*	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Disseminating good practices in the field of supply chain finance through awareness-raising activities*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

### 3.4 - Helping to revive EU securitisation markets through appropriate legislation is\*

- ☐ Very useful
- ☒ Useful
- ☐ Not very useful
- ☐ Not useful at all

### 3.5 - Increase cooperation with financial institutions to raise awareness of EU financial instruments for SMEs by signing agreements with relevant EU and national associations is\*

- ☒ Very useful
- ☐ Useful
- ☐ Not very useful
- ☐ Not useful at all

### 3.6 Any further suggestions or comments?

*1,500 character(s) maximum*

The objectives presented in the questions are all useful. Again however, the question is, how can the European policies support SMEs' access to finance in the most efficient manner. We see that banking regulation should be assessed in this perspective. Targeted SME financing tools, even new ones, are to be welcomed, but the vast majority of SMEs depend on regular bank loans. So, the banking sector's ability to finance SMEs is the most important question to explore, including specifically the impacts of the new regulation covering the financial sector. Having said this we want to highlight that new financing measures for e.g. growth companies benefit the majority of "regular" SMEs as well, since tailor made financing Instruments would make room for financing other companies.

## 4 - Promoting market access for SMEs

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### 4.1 How important are the following initiatives in improving access to the EU single market for SMEs?

	Very important	Important	Less important	Not important at all
Upgrading the Enterprise Europe Network by developing local cooperation with SMEs stakeholders & providing new services*	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Setting up a European Resource Efficiency Excellence Centre to inform & advise SMEs & provide support on this field*	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Helping some 100 less-advanced cluster organizations to develop customised support services for SMEs through twinning schemes with advanced cluster organizations - by 2020*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

4.2 Developing an integrated Commission strategy to help SMEs do business outside the EU (to increase the percentage of such firms up to 20% by 2020)\*

- ☒ Very useful
- ☐ Useful
- ☐ Not very useful
- ☐ Not useful at all

4.2a How important are the following proposals, which could be included in the Commission's strategy to help SMEs do business outside the EU?

	Very important	Important	Less important	Not important at all
Providing added value & complementing the national & regional assistance provided by defining the geographic scope of measures clearly*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Strengthening links between various EU support programmes & initiatives (EEN, IPR Helpdesk, EU SME Centres, etc.)*	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Showcasing successful EU SMEs operating on global markets & increasing awareness among SMEs of EU-financed initiatives in this field*	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encouraging SMEs to expand business outside the EU through Missions for Growth & cooperation within international clusters*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Supporting an international environment that is more conducive to doing business for SMEs by establishing & following up SME dialogues with key EU trade partners*	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



4.3 Exploring the option of targeting policy measures on mid-range companies (firms with over 249 employees) to help them expand their international business is\*

- ☐ Very useful
- ☐ Useful
- ☐ Not very useful
- ☒ Not useful at all

4.4 Any further suggestions or comments?

*1,500 character(s) maximum*

Promoting SMEs' Access to internal market and markets outside the EU is utmost important. Once again we have to express that although targeted measures to enhance SME-exports and internationalisation is important, it is even more important to build a growth-encouraging business environment. To that matter, flexible labor market regulation, SME-friendly public procurement system, environment legislation built on Think Small principle are essential.

About broadening the scope of policy measures (state aid we suppose), we see that there is a risk of loosing the focus, which is concentrating on true SMEs. We understand the difficulty that thresholds create, but we would still stick to the current definition.

## 5 - Releasing entrepreneurial & innovation potential for growth

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5.1 - Scaling up the "Erasmus for Young Entrepreneurs Programme" from 800 to 10 000 exchanges a year by 2020 is\*

- ☐ Very useful
- ☒ Useful
- ☐ Not very useful
- ☐ Not useful at all

5.2 - An EU-wide Early Warning Platform for stakeholders and experts to provide counselling to business in difficulties and help viable companies surmount the crisis, save jobs and avoid bankruptcy is\*

- ☐ Very useful
- ☒ Useful
- ☐ Not very useful
- ☐ Not useful at all

5.3 - Setting targets for all EU countries to integrate entrepreneurship into secondary school curricula as a key subject by 2018 is\*

- ☒ Very useful
- ☐ Useful
- ☐ Not very useful
- ☐ Not useful at all

5.4 - Ensuring that the on-line platform for women entrepreneurs (to be launched in 2015) becomes a recognised and used one-stop shop involving local, national & EU stakeholders is\*

- ☐ Very useful
- ☒ Useful
- ☐ Not very useful
- ☐ Not useful at all

5.5 - Consulting entrepreneurs throughout Europe to collect ideas for new initiatives to promote entrepreneurship and youth start-ups is\*

- ☐ Very useful
- ☐ Useful
- ☒ Not very useful
- ☐ Not useful at all

5.6 - Supporting EU countries and regions to develop models for start-up and growth centres and promoting these models is\*

- ☐ Very useful
- ☐ Useful
- ☒ Not very useful
- ☐ Not useful at all

5.7 How important are the following initiatives in facilitating the transfer of business?

	Very important	Important	Less important	Not important at all
Urging EU countries to put in place national action plans on business transfers and have a one-stop shop on transfer or a transfer of business element in existing one-stop shops by 2017*	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Developing and spreading "Quality Standards" for online markets for business transfers & encouraging the linkages between already existing cross-border matching platforms*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Facilitating EU-wide networking to encourage exchanges between researchers & practitioners; setting up a European Mentors Network for Transfers*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Supporting an EU-wide matching platform for universities/business schools focusing on business transfer*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

5.8 How important are the following measures in supporting the Commission's new clusters strategy?

	Very important	Important	Less important	Not important at all
Promoting and supporting business management innovative models, also through initiatives aimed at developing new managerial skills for SMEs*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Bringing together cluster policy-makers in a European Cluster Growth Policy Platform, to share policy experience & develop a shared methodology for cluster policy*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Setting up a regular dialogue on emerging industries with SME communities and business support & clusters practitioners	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

## 5.9 Any further suggestions or comments?

*1,500 character(s) maximum*

This part of the questionnaire included very heterogenous issues. We see that setting up new schemes, programs, platforms etc. is not as important as securing the efficient enforcement of those initiatives that exist already.

We do not fully believe that an EU wide Early warning platform could be feasible. Increasing co-operation between existing means of co-operation could be a more pragmatic way forward.

Point 5.3. touches integrating entrepreneurship into secondary school curricula: We point out, that it is necessary to integrate entrepreneurship into curricula at all levels of education and training. As important as encouraging women's entrepreneurship is, we see that it might not be very useful to separate this phenomenon from other forms of entrepreneurship. Of course, there are common nominators touching female entrepreneurs, but the broader issues of business environment are equally important for male and female entrepreneurs.

Collecting ideas from entrepreneurs to promote entrepreneurship sounds quite strange. It is far more important that the Commission concentrates on policy issues.

Developing models for start-up and growth centres: again, focus should be on efficient policies, not on building new layers of organizations. All in all, it should be considered to merge SBA and Entrepreneurship 2020 Action Plan. There are many overlapping issues, which risks the efficiency of the policies.

## 6 - Boosting skills development

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6.1 How important is to launch a Commission initiative, comprising employment, education & enterprise dimensions, to overcome the shortage of skilled labour by promoting the following measures?

	Very important	Important	Less important	Not important at all
Training schemes for skilled workers directly involving SMEs from the concerned sector*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
A dual system in vocational training*	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A better image of skilled crafts & technical jobs in SMEs*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

6.2 Any further suggestions or comments?

*1,500 character(s) maximum*

We see that boosting skills development is highly important. But the questions that should be thoroughly touched here are related to the functioning of the European labor market. One key issue should be modernizing the labor related legislation at both EU and national level. This kind of an initiative has already been included in the Entrepreneurship 2020 Action Plan. We believe in better policies, not in campaigns.

## Contact

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