

# 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

---

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

---

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\*

Géraldine Verbrugghe, EuroCommerce

1.3 - Please give your e-mail address

verbrugghe@eurcommerce.be

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- ☐ **I do not want my contribution to appear - please keep it confidential** (It will not be published, but used internally within the Commission.)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

---

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 type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input 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*

EuroCommerce calls for a new impetus to the Small Business Act with tangible measures to restore the competitiveness of businesses. Legislation needs to be properly designed by strictly applying the Think Small First principle, based on independent impact assessments and a compulsory SME test in all three institutions. The EU needs an ambitious smart regulation programme including competitiveness proofing. REFIT should focus first on the most burdensome regulations. Evaluation process in REFIT has to remain pragmatic and the policy option chosen be strongly justified and corroborated by high standard evidence. In this regards, we ask the Commission to maintain the commercial agents directive 88/653/EC, which has played an instrumental role facilitating the development of cross border commercial agency activities and which is still fit for purpose. We also need a think of commerce reflex in policy making when considering new legislation or changes to existing legislation: the retail and wholesale sector face the challenge of meeting a wide range of legislation and is disproportionally affected as a result of the number of products and product categories our members sell.

## 3 - Access to finance

---

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 type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Disseminating good practices in the field of supply chain finance through awareness-raising activities*	<input checked="" type="radio"/>	<input type="radio"/>	<input 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*

## 4 - Promoting market access for SMEs

---

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 type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strengthening links between various EU support programmes & initiatives (EEN, IPR Helpdesk, EU SME Centres, etc.)*	<input checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input 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*

A renewed commitment by Member States to the Single Market vision is needed. EuroCommerce calls for better governance and enforcement, by fully respecting the principle of mutual recognition, stopping gold-plating of EU law and ensuring effective enforcement of EU law and far better co-operation among Member States on a voluntary basis to pursue the Single Market. We also call for proper implementation of the Services Directive, well functioning single points of contacts and the lifting of discriminatory barriers.

With regards to access to markets outside the EU, we consider tariff and non- tariff barriers the main challenges having an impact on the performance of EU businesses. We encourage more legal certainty and predictability as key principle of EU external policies. We recommend a focus on the reduction of non-tariff barriers which creates problems on harmonisation and mutual recognition of labelling and certification rules. The administration of such barriers increases costs for import/export traders, wholesalers, retailers and ultimately consumers. As a good practice example, we lend our full support to the EU Market Access Partnership, a key pillar of trade policy aiming to reduce the obstacles faced by European exporters of goods and services. We also call for the promotion of International trade agreements wherever possible. Last but not least, we would also encourage DG Taxud to better take into account the aspect of competitiveness in its proposals.

## 5 - Releasing entrepreneurial & innovation potential for growth

---

### 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilitating EU-wide networking to encourage exchanges between researchers & practitioners; setting up a European Mentors Network for Transfers*	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supporting an EU-wide matching platform for universities/business schools focusing on business transfer*	<input checked="" type="radio"/>	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

## 5.9 Any further suggestions or comments?

*1,500 character(s) maximum*

E Commerce is a great driver of innovation and growth but we need to make sure that there is an adequate European regulatory environment. Online competition does not just concern the price of products, but also other factors such as customer service and delivery. As such, it is important that there is a level playing field for companies, online and offline, large and small, in which fair and healthy competition can occur across Europe.

Removing barriers which act as impediments to trading online is also critical: market entry costs, offline bureaucracy, or having to adapt to different harmonized product requirements and return policies. By completing the Digital Single Market, the capacity of businesses to trade on the same basis in all Member States will be greatly boosted. VAT regimes also differ from Member State to Member State. In the long-run there should also be one EU VAT system with harmonised rules and one VAT return for all transactions within the internal market. In the meantime, EuroCommerce calls for a data point where businesses can find a summary of all the regimes across the Member States.

Finally, the digital age puts the consumer in control. Data protection is something that is highly valued by consumers and citizens in general. There is a need for balance between the consumer and business interest and a need not to prohibit legitimate uses of data.

## 6 - Boosting skills development

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 checked="" type="radio"/>	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## 6.2 Any further suggestions or comments?

*1,500 character(s) maximum*

The commerce sector is undergoing a major transformation, driven primarily by the rapid expansion of the digital economy affecting business models and processes of retailers and wholesalers. This digital revolution requires a whole set of new skill sets. In addition to this new landscape, consumer spending is down and competition is fierce, putting a premium on innovation and efficiency, while making it harder to earn a return on investment. The regulatory environment also continues to exercise a significant influence over developments in the commerce sector. In the light of these changes European Skills Council Commerce partners have identified a core group of knowledge, skills and competences for each of the following occupations; warehouse operator, store manager, shop assistant, call centre agent, supply chain professional, checkout manager, retail entrepreneur, and specialist seller. General knowledge needed refer to the products and/or services on offer. There is also a list of supplementary skills needed by the digitalisation of the sector as well as new soft skills which are sometimes difficult to describe, difficult to acquire and even more difficult to assess.

## Contact

✉ [entr-sba@ec.europa.eu](mailto:entr-sba@ec.europa.eu)

---