

# 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\*

Bundesverband der Deutschen Volksbanken und Raiffeisenbanken/National Association of German Cooperative Banks

1.3 - Please give your e-mail address

info@bvr.de, stolberg@bvr.de

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

Further progress in reducing administrative burden and in better regulation on the EU level is necessary. The installation of a regulatory control council would be useful on the European level. The German "Nationaler Normenkontrollrat" can be a good model for forming such an European regulatory control council.

The Small Business Act with the aim "Think small first" shall bear in mind the different banking structures, especially the smaller banks like the cooperative banks. Therefore proportionality and diversity of banks shall be considered in banking legislation. Otherwise there will be disproportionately regulatory and administrative burdens for smaller banks.

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

Banks play a significant role as sources of financing. We do not agree with the European Commission's assessment that the traditionally strong reliance on bank sources of financing obstructed the availability of financial resources to companies. We have a well functioning corporate financing sector in Germany and many other EU member states. Whilst it may be true that parts of the EU are haunted by an excessively low availability of long-term financing, this lack is due to the present high economic uncertainty and the limited capabilities of the banking systems in the peripheral Member States which is accompanied by the extraordinary interest rate environment that is the result of an extremely expansive monetary policy. For most SME's financing in the capital markets is bound to be overly complex, too expensive and subject to an excessive amount of rules and regulations (e.g. minimum volumes, reporting and disclosure obligations). An arbitrary promotion of capital market financing aimed at weakening the importance of banks is potentially dangerous. When looking at the new financial instrument of crowdfunding it is also worth noting, that from the point of view of investors, crowd investing constitutes a high risk investment involving a potential loss of the entire capital employed. The promotion of crowdfunding shall and may not be assigned a higher priority than investor protection as well as consumer protection.

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

## 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 type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supporting an EU-wide matching platform for universities/business schools focusing on business transfer*	<input type="radio"/>	<input checked="" 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*

## 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 checked="" 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*

## Contact

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