

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*

Federation of Hellenic Associations of Young Entrepreneurs

1.3 - Please give your e-mail address

info@esyne.gr

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- ☐ **I do not want my contribution to appear - please keep it confidential** (It will not be published, but used internally within the Commission.)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

There is also a lot of private side administrative burdens i.e. in Greece to open a bank account and be able to use it it takes more than 3 weeks in some cases while the typical is 10 working days. In VC funding rounds there are a pile of cumbersome clauses in share holders agreements that basically limiting heavily entrepreneurs freedom of movement even in case the investor has just the 10-20% of the companies shares. these agreements tent to take months to finish due to the legal complexity they introduce. A set form of shareholder agreement set as a standard will vastly minimize the time needed to reach an agreement for funding.

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

All the proposed actions above are in the plane field of communications or in favour of the investors. What is not understood by EU Commission is that investors are not driving the ecosystem, the products and value that start-up and SMEs produce are what can drive an ecosystem to thrive. All measures listed, even crowdfunding, are inadequate to solve the problem of access to finance. In Europe there is a culture of risk averse in investments. Expecting or assuming that investors will start investing suddenly because of regulation removal or incentives, or even due to awareness is at least naive. Disregarding the deep roots of the problem which is safe investment culture and lack internal urge to give back to society is one of the main problems the planned policies have. In Europe crowdfunding is failing not because of regulation but because of investment culture. the same is the reason behind of the lack of Angel investments. You cant persuade a lazy investor to invest to risky startups whatever legislation you make. Only one thing can bring investors to startups. The successful products and ventures. To get them you have to bypass the bottleneck of investors in the early stage. There is a way to do it institutionally in a market driven way. Our organization has filed a proposal to EIF - EIB that is called iDea Framework that can solve the problem by utilizing European Social Fund and private Charity Funds while the whole system is driven by the entrepreneurs themselves.

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

In Europe the difficult part is to start a business. All the efforts are needed for businesses that have 0 to the first 30 employs and are extrovert. The others need more regulatory assistance and lesser support per se. Please to grow jobs we need to support really the little guys that start not the big guys that have access to numerous of tools and capital to invest to use them.

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

There is a misunderstanding that Clusters are created by someone that will make it happen somehow magically or with incentives. There is not such thing. A company that builds a product starts a need. Other companies that can assist are born to help the first to cover the need to deliver fast and efficiently. More companies are coming in the newborn cluster to compete the first. Then we have a cluster. What makes a cluster is the first little guy that starts his idea and makes a success. EU Commission consistently forgets that major first step. The startups and the successful SMEs that thrive create a Cluster IF THEY NEED ONE TO EXIST not the top down policies or the consultant firms. Your aims are still wrong. If you ask consultants and academia to tell you what is needed for entrepreneurs you will get more consultants and academia at the end, and NOT entrepreneurs and sell-able products.

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 type="radio"/>	<input checked="" 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 number one issue is the access to Seed capital and especially in the South of Europe. There is a tendency to hide the real issues. In Greece we have four VC funds since 2013 for the ICT sector. Until today from all over Greece they have received from young entrepreneurs, inventors, researchers and ordinary people more than 4000 proposals. They have invested in Seed in just 20. All that in a country that has 60% youth unemployment. We cant say anything more. Your measures till now are at least inadequate. You don't see that there is a culture in safe investment and a huge risk aversion together with monumental lack of technology understanding from the investing community. If somehow don't find a way to disconnect the young and novel with the old and traditional we will never get up and compete with the rest of the world. We have a proposal submitted to EIF and its called iDea Framework. Find it and implement it. It will solve everything coz it places in the driving seat the young and novel while allowing the old and traditional to help at no cost and allowing the old to smell the profit and see results. We have to remember that we cant push investors to invest in risky business, but we can pull them to invest in ideas that have got traction. If we never allow ideas to get traction we will never attrac investors. So stop focusing in regulation and awareness and start helping directly the entrepreneurs. The startups are creating the ecosystem not the ecosystem the startups.

Contact

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