



European Office of Crafts, Trades and Small and Medium-sized Enterprises for Standardisation  
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## **NORMAPME comments on conclusions, findings and recommendations of the SME Access Project's Final Report**

### **Background**

More than one year ago, the European standards bodies CEN and CENELEC agreed to establish a working group composed by several stakeholders with the aim of developing recommendations on how to improve access to European standardisation for small and medium-sized enterprises (SMEs).

The group decided to commission to Professor Henk de Vries (Rotterdam School of Management, Erasmus University) and his team a study on possible solutions to improve the value of standardisation and standards for SMEs and to reduce their financial impact. The project addressed European standards (including their development) and standardisation, and related these to the business goals of SMEs.

The contractor and his staff developed a set of 58 solutions: first, for greater benefit to be obtained from standards; second, to achieve more benefit from involvement in standardisation, and a third category of general solutions to facilitate these aims. They are solutions to the barriers SMEs face, and examples of the solutions have been provided. This set of 58 solutions may be seen as a 'toolbox' from which NSBs and trade associations can select the appropriate subset to support SMEs in their country.

A survey among both NSBs and trade associations showed support for almost the entire set of solutions. Many of the proposed solutions are in place already in a substantial number of NSBs.

Further to its recent release, NORMAPME wishes to comment on the conclusions, findings and recommendations of the final report.

### **Identification of barriers for SMEs**

According to the report, SMEs may face the following sequence of barriers to benefit from **standards**:

- awareness of standards;
- awareness of the importance of standards for the SME's own company;



- tracing standards;
- obtaining standards;
- understanding standards;
- implementing standards;
- evaluating the implementation of standards.

They may, in addition, face the following sequence of barriers to benefit from **involvement in standardisation**:

- awareness of the process of standardisation;
- awareness of the importance of involvement in standardisation for the SME's own company;
- tracing standardisation projects;
- becoming involved;
- being involved effectively;
- evaluation.

According to our experience and knowledge, the above listed barriers are indeed what the large majority of SMEs face when it comes to standardisation, and we wish to congratulate the contractor of this study for having identified the problems with such accuracy and precision.

### **Clarity of the report**

The report is very well structured and provides a useful toolkit of solutions as well as very useful recommendations about how to improve the role of trade associations to link the barriers and practices that SMEs may face in accessing standards and standardisation processes (chapter 6.7).

### **General recommendations to NSBs and trade associations**

We believe the general recommendations of this report would be of good use to national SMEs associations, although SMEs-only associations may not be able to have the financial and time resources necessary to implement the measures described in the recommendations addressed to trade associations.

Concerning recommendations to NSBs, the report underlines that the top priority for NSB is to further improve or establish relationships with trade associations at national level, to provide them with knowledge and materials, to discuss with them the respective roles. It should be underlined that in its work programme, which was submitted to the European Commission's



review before the release of this report, NORMAPME has planned to work on enhancing the relations between national SMEs associations and NSBs for the next few years.

### **SMEs demonstrated standardisation is of high importance in their agenda**

SMEs organisations have been very active and contributed to this study: 16 people coming from SMEs associations contacted by NORMAPME responded to the survey Prof. De Vries circulated to our secretariat. Some of them also contributed to this study with examples of good practices they implement for enhancing their members' understanding and uptake of standards (Confartigianato, IFD, ECAP). Despite this active involvement, the report underlines SMEs-only associations were not responding enough, which is true if compared to the number of answers received by NSBs (100% of European NSB responded to the survey).

However, considering the time available for answering the survey and the time resources available to SMEs for this kind of issues, we wish anyhow to congratulate SMEs for their responsiveness.

### **Content of the toolbox:**

Concerning the content of the recommendations included in the report, we understand particular attention would be probably paid by ESOs, NSOs and possible policy makers, to the solutions ranked as the most important/cost effective in Figure 1, 2 and 3.

However, NORMAPME believes this would not be the good decision to take, in order to solve the problem of SMEs' access to standardisation, especially in the light of the following:

#### **1) Participation and responsiveness**

- As the report duly underlines, out of 69 respondents 39 were NSBs or sectoral standards bodies. Therefore, we fear that such a massive responsiveness from NSBs possibly misled the final results towards a direction that does not correspond to the real needs of SMEs, but rather to the opinions of NSBs on this matter.
- SMEs-only organizations who responded to the questionnaire represent less than 20 % of the respondents. Trade associations representing both large enterprises and SMEs represent also less than 20% of the respondents.

#### **2) Different ranking of priorities between mixed trade associations and “SMEs-only” associations**

- We observe many differences between SMEs-only associations and mixed trade associations when it comes to the perception of priorities.



For instance, each of the following solutions has been rated as priorities by SMEs-only associations (fig 16, 17 and 18) but obtained a lower score when rated by mixed trade associations:

S13: Method for tracing standards on NSB websites

S18: TCs should use the CEN/CENELEC Guide to write standards considering the needs of SMEs

S19: CEN/CENELEC should assess standards on user friendliness for SMEs

S3: NSBs should develop communication for SMEs

S26: Trade associations should provide education, training and advice to SMEs on implementing standards

S21: TCs should create a document for interrelated standards

S27: NSBs should create online user panel per standard to enable discussions and interpretation

S49: NSBs should provide assistance to SMEs to initiate new activities

S45: CEN/CENELEC should make methods available to evaluate rate of return on resources used for standardisation

S47: CEN/CENELEC should develop methodology to evaluate standardisation projects incl. stakeholders' involvement

S40: NSBs should seek mechanisms to ensure that cost is not a barrier to SME participation in standardisation.

Among those solutions, we believe S19, S21, S47, S40, S3, S49 would be of greatest benefit to SMEs if duly implemented. Although those solutions did not encounter the enthusiasm of mixed trade associations, we are convinced they should be included among the cornerstones of the review of the European standardisation system.

### **3) Difference between SMEs-only priorities and overall classification**

- We understand that due to the responsive rate of SMEs-only associations, which was much lower if compared to the one of NSBs, many differences exist between the overall classification of priorities and the one built upon the collection of SMEs associations' inputs.

However, we believe it would be regretful if some of the solutions that were considered as priorities by many European SMEs (e.g S3; S19; S18; S40 and S49) are dismissed by ESOs and policy makers because of their low position in the overall classification (fig 1, 2 and 3).

In its constant dialogue with European SMEs and in its dealing with standardisation technical committees during the last few years, NORMAPME has observed some discrepancies between the perception standardisers have of the user friendliness of the standards they draft, and SMEs' perception of the same standards.

This is the reason why we warmly suggest S19 (CEN/CENELEC should assess standards on user friendliness for SMEs) to be considered as a very valuable recommendation.



In addition, in order to ensure the user friendliness for SMEs is maintained, the presence of SMEs in the Technical Committees in charge of drafting the standards is of paramount importance. One of the reasons why SMEs do not usually participate in the work of the TCs is the direct and indirect costs it would imply to be present. Hence, we are convinced recommendation S40 (NSBs should seek mechanisms to ensure that cost is not a barrier to SME participation in standardisation) is very valuable and should be duly taken into consideration. Finally, we do believe NSBs should provide assistance to SMEs to initiate new activities. It is in fact our experience that SMEs face much more difficulties than large enterprises or certifiers in initiating new standardisation activities. For instance, we acknowledged the case of a SME which had actually developed an innovative technology, but which faced (and is still facing) huge barriers to obtain that this new safe, revolutionary and environmentally friendly new technology is finally accepted and standardised by the relevant TC due to strong pressures coming from other stakeholders. Hence, we recommend S49 is also retained by the policy makers and ESOs as a good suggestion for the forthcoming review of the standardisation system's rules.

## **Conclusion**

NORMAPME welcomes the initiative of the CEN and CENELEC to question the accessibility of European standardisation system and of European standards for small and medium-sized enterprises.

We do warmly recommend considering the list of priorities as compiled by SMEs-only associations as in figures 16, 17 and 18, as it better reflects the needs and wishes of European SMEs.

In the light of the increasing contribution of standardisation to innovation in Europe, we feel that the opportunity of amending the system in a more SMEs' friendly manner should not be missed. We would welcome the support of policy makers and ESOs towards the implementation of the suggestions SMEs consider the top priorities, and which should be addressed by a possible reform of the entire system.