

## **NORMAPME POSITION PAPER ON THE EUROPEAN COMMUNICATION “Towards an increased contribution from standardisation to innovation in Europe”**

First of all, European Small and Medium sized Enterprises (SMEs) thank the European Commission for demonstrating your interest in their cause by having incorporated in the communication most of the comments that NORMAPME made to the European Commission’s working document on “strengthening the contribution of standardization to innovation”.

Having stated our overall agreement with your communication, we believe that few points need some clarification:

- In the last paragraph of **Part 3**, we would like to outline that the refusal of some standards in the service sector by SMEs is not only based on their difficulties of access to standardisation. We believe that standardisation should remain market driven. It would be inappropriate to impose service standardisation to SMEs based on their difficulties of access to standardisation and by ignoring their rejection of such standards in some service sub-sectors.
- In **Part 4 (3)**, we believe that the European Commission should be extremely cautious about encouraging public authorities to refer to standards in public procurements. This may lead de facto to the disappearance of the standardisation voluntary principle.
- In **Part 5 (2)**, the solution to achieve better coherence between formal and informal standards should preserve the possibilities for SMEs and their representatives to participate considering also their limited resources.

As mentioned in **Part 5 (3)**, globalisation is a key issue for standardisation. Nevertheless due to insufficient resources, it is more complicated for SMEs to take part in standardisation at international level than at European level. The use of European developed standards should be promoted as well as the transposition of European standards at international level. To achieve these two points, National Standards Bodies should be urged to act via their European Bodies when dealing with other parts of the world.

We believe that **Part 5 (6)** should emphasise the importance for our traditional SMEs to be able to implement both existing and new standards in their organisation. The usage relevance is increasing when concerning management standards. The implementation of well adapted standards constitutes an innovation per se and it facilitates the innovation abilities of SMEs leading to enormous economic benefits. Therefore in order to improve the usage of standards by SMEs, national policies to increase standard visibility and simplification and to mentor SMEs should be initiated and coordinated at European level.