



NORMAPME Comments on the Final Report of the Study “Access to Standardisation”

NORMAPME wishes to express its satisfaction for the completion of this study that aimed to give insights in the real conditions of access to standardisation.

The problems of access to standards and consequently for the use of standards by SMEs are in our experience acute and they are related to the difficulties SMEs face in participating in standardisation.

We express our satisfaction that many of the problems for SMEs and other weak stakeholders have been brought to light and we wish to congratulate the researchers for their work and the EC for having initiated and guided the study.

The conclusions are sound in general and they reveal that while the European Standardisation System is open and sound it can also be “heavy” to use and take full advantage by weak stakeholders such as SMEs in general. This is particularly true for micro enterprises and SMEs in traditional sectors.

The recommendations address several important aspects such as the unequal conditions of access existing in the European member countries in standardisation; the price of standards; the reorganization of both standardisation institutions, stakeholders and trade associations in particular to improve participation of SMEs; the dilemma of national versus European models for organizing standardisation. All those points are clearly put on the table. The need for a significant effort in training is well expressed; better cooperation between standards organizations and stakeholders is properly presented.

We are convinced proper registration of participants in standardisation is a good recommendation for transparency and would lead to a more balanced representation of all concerned stakeholders.

Balanced representation of relevant stakeholders should be verified both at national and at European level.

Voting rights of CEN associate members and CENELEC cooperating partners at BT and TC level is necessary to increase their influence.

Better distribution of information material starting with public enquiries and the use of ICT communication tools for wider consultation of stakeholders are useful recommendations.

Nevertheless we wish to point out some weaknesses of the study due to inherent difficulties that have not been overcome.

1. The study fails to provide a full overlook on the lack of penetration of standards in the European economy. The statistics concerning the number of standards sold and the amount of customers of standards are not reported. We have data indicating that very few standards are



sold to a very limited number of customers compared to the 22M enterprises existing in Europe. Complete data could be useful as a benchmark for future improvements.

2. The sample of SMEs that was used for the study tends to originate in the enterprises that already participate in standardisation and thus have a more positive opinion of the existing conditions than the vast majority of SMEs that do not participate individually or through representative organizations. In addition, consultants and certifiers often present themselves as SMEs and thus are registered in the wrong category.

These weaknesses of the study do not allow seeing a clear picture of the huge differences of awareness existing towards standards and access to standardisation. For instance, Table 7.14 shows that the average SME responding to the questionnaire has participated on the average in 5 TCs in the last five years. This is very far from the reality of SMEs. The trends are not wrong since we find that large enterprises and certifiers, consultants and laboratories participate much more frequently than SMEs. It is only that the actual gap is grossly underestimated.

3. Finally the strong competition that exists at both European and national level for the title of “representative of SMEs interests” has not been filtered out by the study team and the “political” statements of some respondents have been received and published as hard data. Section 3.3.5 is unfortunate in our opinion as much as the specific comments about NORMAPME on the pretended operation of other stakeholder organizations “working in a vacuum” are reported. It should be revised.

In summary we believe that the study is a good step forward that should be followed by further concrete steps in order to actually strengthen and improve the European Standardisation System.