# Action 2: Think Small First

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EXECUTIVE SUMMARY

NORMAPME accomplished the tasks described in the proposal 2009-2010 in order to achieve all the main objectives which were fixed on July 2009.
NORMAPME has thus been actively involved in policy making activities aimed at bringing forward the implementation of the “think small first” principle in policy making processes having impact on standardisation.
In 2008-2009, NORMAPME participated in the EI M study access to standardisation and the CEN-CLC SMEs access project. The latter project resulted in the creation of a CEN-CLC SME Working Group (SME WG) in February 2010. NORMAPME has a leading role within this group which aims at identifying, implementing and monitoring actions to improve SMEs’ access to the European Standardisation system.
NORMAPME has also contributed to the review of the standardisation system through its work within the EC experts panel (EXPRESS) and via EC public web consultation. NORMAPME’s campaign received a positive reception in the European Parliament where a Hearing on the future of the standardisation system was organised in June 2010. Director Gourtsoyannis discussed with numerous MEPs and intervened at the IMCO committee presenting NORMAPME’s position.

We also monitored and contributed to the European policy making agenda, and focused on the following subjects:
- The Ecodesign Directive recast and Energy labeling especially since the scope of the directive has been extended and does not only include Energy using products but also Energy related products.
- The Construction standing committee
- The EC dangerous substances
- Innovation management
- ICT steering committee
- Lifts WG
- Protection of workers from electromagnetic fields

NORMAPME advocated SMEs positions and sought collaboration with other stakeholders’ representatives in relevant bodies related to standardisation, certification and accreditation. NORMAPME has also set up a European Accreditation SME expert group (EA SME Task Force) to tackle the issue of conformity assessment procedures at accreditation level. The Task Force’s work had the objective of producing two documents for input at EA (European Accreditation group): first, guidelines targeted to Conformity Assessment Bodies (CABs) for harmonizing and monitoring conformity assessment procedures to be applied to SMEs and secondly, harmonised criteria on the capability to implement conformity assessment procedures adapted to SMEs. It is recommended that the EA SME TF is maintained for next contract as it took more time than expected to finalize the documents and receive comments from EAAB, EA/HHC. It is also important to note that this delay has had an impact on other related activities like the ones linked to the IAF.

NORMAPME has also participated in meetings and public events on topics related to standardisation and SMEs during the SME week in May 2010. CEN-CLC offered NORMAPME to co-organise the CEN-CLC open days next year as NORMAPME is the key partner for SMEs interested in standardisation activities. We have also attended events related to innovation, energy efficiency during the sustainable energy week to mention only those conferences.

Besides, NORMAPME has represented SMEs’ interests in the relevant management committees of the standards setting organisations such as the CEN BT, CENELEC BT, CEN CA Administrative Board, CEN-CLC General Assembly, ETSI General Assembly, ICT/SB, ETSI Board and OCG, CEN Technical Committee Management Group.
In addition, we took part in three new other committees and working groups which appeared relevant to our objectives. These groups are namely: CEN BT WG 211 on balanced representation of stakeholders, the Joint President Group, the ETSI OCG related to ICT services for SMEs and ETSI STF on standardisation initiatives for SMEs.

Finally, NORMAPME established (or enhanced) cooperation with other European associations also representing SMEs. In order to evaluate our communication strategy and hence improve our cooperation with the other European associations also representing SMEs, we have circulated a questionnaire to 18 business associations.

The results of this consultation show that these associations are overall satisfied with their cooperation with NORMAPME. However they request more targeted information. NORMAPME plans to correct its approach and will improve its website with an extranet, developed in Action 3/2009, and give targeted access to interested business associations.
**LIST OF DELIVERABLES:**

71/631 Meetings attended

15/15 Conferences attended

1 revised list of business associations including revised planning of cooperation and favourite communication means

19/162 Letters of invitation for official meetings

15/163 Follow-up letters of official meetings

16/16 meetings attended with EU business associations

E-mail exchanges on topics of cooperation with EU business associations: contacts on a monthly basis with some of them

4/4 conferences and events with EU business associations: 3 Orgalime CPD TF, AIE event

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**2.1: Monitor and present SMEs viewpoints on EC horizontal and sectoral policies on standardisation with regards to the “think small first” principle:**

NORMAPME has monitored the European policy making agenda, and mainly focused its efforts on subjects strictly linked to standardisation such as the Express Panel developments, CEN-CLC access to standardisation project and the SME WG, the Ecodesign Directive and implementing measures, ICT standardisation, Lifts, Construction, innovation management and finally the Electro Magnetic Fields. NORMAPME has monitored the revision of New Approach Directives as well as Directives which have an impact on standardisation. We have informed relevant stakeholders (SMEs and NSBs) of their development at EU level providing access to the relevant documents. NORMAPME has also ensured that SMEs submit their input to relevant impact assessments, surveys and consultations such as the EC consultation on the review of the standardisation package and the EC online consultation on the alignment of ten sectoral directives to the new legislative framework. It is also important to note that SMEs’ participation in stakeholders’ fora and public consultations was enhanced and regularised.

We have also advised and recommended the EC on issues related to standardisation and internal market when appropriate and took part in established EC expert groups and standing committees related to “New Approach” Directives and standardisation. These groups and committees are namely: the Construction

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1 Number of official meetings with EU business associations has been revised, see Annex.
2 Number of official meetings with EU business associations has been revised, see Annex.
3 Number of official meetings with EU business associations has been revised, see Annex.
Standing Committee, the ICT Steering Committee, the Lifts Working Group and the EC Expert Group on Dangerous Substances.

Besides, NORMAPME has met the EC and EFTA services in order to discuss relevant standardisation issues affecting SMEs such as the revision of the standardisation package, the standardisation of innovation management services and the Ecodesign of energy-related products. Likewise, NORMAPME has been involved in the activities of the Express Panel as it is closely linked to the revision of the standardisation package, and informed SMEs accordingly. We have indeed actively participated in the review of the standardisation system by defending and supporting the SMEs’ interests (see NORMAPME position paper on the review of the standardisation system available at www.normapme.com in relevant meetings with the EC.

We have ensured the voice of SMEs has been duly taken into account by EC officials regarding the Ecodesign of energy-related products. Together with other SMEs associations, we met different EC services in order to spread SMEs concerns and impact the EC working plan on Ecodesign. We originally planned to focus our action on the Ecodesign consultation forum where stakeholders can intervene, but this process is behind schedule.

NORMAPME intervened in conferences organised by EC or EFTA units and services and participated in several public events related to standardisation such as the CEN-CLC Open day during the SME week, the sustainable energy week, the EC Conference on ICT Standards Education etc. An important event which took place during the year was a public hearing organised by the IMCO committee in the European Parliament on the future of standardisation. Director Gourtsoyannis delivered a speech and presented NORMAPME’s position to the MEPs.

Finally, we have participated in the elaboration of EU standardisation policies by providing comments on various EC working documents and communications on topics such as the Ecodesign of energy-related products, the Lifts Working Group or the standardisation of innovation management services. See details below.

**Improving co-operation with SMEs beyond NORMAPME constituency**

NORMAPME has summarised and analysed EC new or revised legislative actions and asked for comments when necessary (within and beyond NORMAPME membership). These consultations mainly concerned the following topics: the review of the standardisation system, the standardisation of innovation management services, the ecodesign etc.

NORMAPME has also duly informed other stakeholders also representing SMEs on the opportunity of participating in relevant impact assessments, consultations, conferences and open roundtables organised by the EC. All of these stakeholders receive our circulars, call for consultation and comments. Moreover, it is important to note that within our activities in Action 2.4, we have also met the European business associations also representing SMEs and used this opportunity to exchange opinions on these subjects where we cooperate.
See Action 2.4 for a more comprehensive analysis of our cooperation with other stakeholders also representing SMEs.

Implementation tools:

- Draft and dispatch informative reports: 3 reports
- Publish draft positions and documents open for comments: 20 circulars.

The report below includes for each issue the strategy and objectives (S&O) identified in August-September 2009, an evaluation of the achievements (EA) when objectives were partially or totally achieved. In addition, the relevant meetings attended are also reported.

**CEN-CLC Access to standardisation and the SME WG**

On August 2009, the CEN-CLC Access Project Final report was released. In this report, 58 recommendations are presented as solutions to enable SMES to benefit from standards and to be better involved in the standardisation process. Further to the release of this final report, a new “SME working group” (SME WG) and four CEN/CLC BT clusters in charge of implementing some recommendations related to BT competences have been established to identify, implement and monitor the actions aiming at improving SMES’ access to the European standardisation system (ESS). The SME WG acts as a platform and exchange best practices by reaching out to SMES, their trade associations and related networks.

**S&O:** NORMAPME plays a leading role in the SME WG as Director Gourtsoyannis has been appointed "Champion" during the February meeting for 3 of the solutions identified by the report which mainly deal with the use of the SME Guide to write SME-friendly standards. Champions responsible for specific solutions are intended to examine the relevant recommendations and prepare an operational plan and timeframe on their possible implementation.

Our objective is to make sure the measures identified as priorities by SMEs associations are duly and effectively implemented. In addition, NORMAPME has declared its interest to participate in the clusters in charge of providing solutions to recommendations related to standards writing.

The recommendations for which NORMAPME has been appointed Champion are the following:

- **Recommendation 35:** Trade associations should inform their members of standardisation projects relevant for their sector or discipline. NORMAPME has been appointed as “Champion” for this recommendation, together with DIN and ORGALIME.
- **Recommendation 36:** NSBs should advise trade associations on standardization projects relevant for their (SME) members.
● **Recommendation 18**: TCs should use the Guide to write standards taking into account the needs of micro-enterprises and SMEs and their specificities in standardisation which are being developed by CEN/CLC BT/WG 208

● **Recommendation 19**: CEN/CLC should assess standards for their user friendliness for SMEs, in terms of understanding and implementation, using the Guide.

**EA**: The 12th of May, Ms Karine Iffour presented NORMAPME’s recommendations to the last SME WG meeting. Regarding recommendation 18, she updated the group on the progress done on the CEN-CLC Guide for SMEs which has been officially approved by the two ESOs on the 4th of June. As for recommendations 35 and 36, NORMAPME drew attention on the need for the education of SME experts at the national level. NORMAPME was then asked to enquire the needs of micro SMEs in terms of access to information and their level of involvement. Besides, on the margin of the CEN-CLC GA Conference in Malta, Mr. Loucas Gourtsoyannis was informed that CEN-CLC available resources to implement all 58 recommendations are limited. The outcome of this implementation is to be reviewed in March 2011 to determine what has been achieved and what is left to implement. NORMAPME will make sure the measures identified as priorities by SME associations are duly and effectively implemented.

**Meetings attended:**
- 4th February 2010, Brussels
- 12th May 2010, Brussels

**Standardisation of Innovation management consulting services**

The standardisation of innovation management consulting services is the purpose of TC 389. However, NORMAPME is concerned that TC 389 is mandated by the EC to develop certifiable standards, which might become de-facto mandatory for SMEs applying to public procurement or government projects, or to access finance and insurance policies.

**S&O**: The objective was to avoid that TC 389 is mandated by the EC to issue certifiable standards, which might become de-facto mandatory for SMEs applying to public procurement or EU projects, or to access finance and insurance policies.

**EA**: NORMAPME has alerted the European Commission on the possibility that such a mandate requiring CEN to draft standards for innovation management consulting process and for requirements relating to the delivery of consulting services in the area of innovation management, could lead to some risks for SMEs. Further to that, DG Enterprise officially asked NORMAPME to carry out a broad consultation on the positions of SMEs on this matter. Together with many other stakeholders, we identified some risks in this draft mandate and drafted a final answer to the EC including all the inputs we received by SMEs associations during the 2-month consultation. Further to the responses we collected from the various consulted stakeholders, we suggested the Commission to take out all references to the CWA 15889 and
IMP3ove tool, explicitly stating in the mandate that consulting services on innovation management should never be considered as a selection criterion for public funds. In case those changes were not feasible, we recommended the Commission to entirely withdraw this mandate. The Commission has recalled that it seriously considered the concerns of SMEs and consequently decided to delay the submission for validation of this draft mandate to the 98/34 committee. This decision to suspend the adoption of the mandate was confirmed during last TC 389 meeting which took place the 8th of June. From now on, the work will mainly focus on technical specifications. NORMAPME will keep monitoring this issue closely. For this reason, NORMAPME decided to officially appoint Mr. Jacques Perrissin-Pirasset, supported by the French association of SMEs APCM, as our expert in TC 389.

Meetings attended:
- 8th December 2009 (Breydel) with Mr. Schade, Mr. Collin and Ms Augustin.
- 14th January 2010 NORMAPME attended a meeting at DGCIS in Paris: the Innovation management issue was also discussed.

Ecodesign of energy related products
Since November 2009, the recast version of the Ecodesign Directive expands its scope from the previous energy-using products (EUP) to energy-related products (ERP). ERP can include items like building insulation and windows, clothing and paper, among many others. The recast of the Ecodesign directive can affect European SMEs as ERP products are usually manufactured or installed by SMEs.

S&O: the objective is to ensure SMEs are consulted during the preparatory studies preceding the discussion and the issue of implementing measures. In addition, we aim at ensuring the presence (physical or through written contributions) of representatives at those meetings where implementing measures affecting SMEs are discussed, taking into account the working plan of the Ecodesign Consultation Forum. For the moment, the process is at its beginning as the Commission launched a call for tender at the beginning of April 2010. The selected Consultant, who is likely to be GRC according to Ms. Villő Lelkes from DG ENERGY, is to start working by September. The Consultant will be in charge of drafting a report elaborating a ranking of potential candidate products for Ecodesign. Once the identity of the Consultant will be revealed, NORMAPME will get in touch with them to ensure SMEs are taken into consideration. The Commission is expected to set up a Working Plan further to the release of the report. Then, each product group is analyzed in a preparatory study to assess whether and which Ecodesign requirements are appropriate. In parallel, CEN-CLC will launch a mapping of all the standards existing which can be used for manufacturing Ecodesign products to make sure standards are available when implementing measures are adopted. NORMAPME’s aim will be to ensure SMEs are duly consulted during these preparatory studies.

EA: We have asked interested SME associations to identify the groups of products of their interest. Together with the relevant associations, NORMAPME attended a meeting with DG Enterprise responsible units to ensure SMEs are duly consulted during the ranking study and the preparatory studies which are to be launched soon. We have also been ensured that there will be an impact on standardisation, as a standardisation mapping will be launched in parallel with the preparatory studies.

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Likewise, it is important to also monitor energy labelling as it is an issue which is closely related to Ecodesign. For this reason, together with three other relevant SME associations (EBC, UEAPME and ZDH) NORMAPME attended a meeting with Ms. Villő Lelkes, from DG ENERGY who is currently working on an energy efficiency label for windows. Further to this meeting, the SME associations, including NORMAPME, have sent comments to Ms. Lelkes to provide her with the SMEs input.

Meetings attended:
- 22nd January 2010 at DG Enterprise.
- 29th June 2010 at DG Energy with Ms Villő Lelkes.

Review of the standardisation system

The EC is preparing a new "Standardisation Package" addressing the future developments of the ESS and will involve a revision of Directive 98/34/EC.

S&O: the main objective is to obtain that the balanced representation of stakeholders, the principle of transparency and accessibility for SMEs are included in the revised Directive 98/34. The issue of obtaining voting rights (even at symbolic one vote level) for weak stakeholders at TC, BT and CA levels of the ESOs will also be promoted.

EA: NORMAPME is involved in the review of the ESS since the beginning of the revision process: Mr. Loucas Gourtsoyannis attended meetings of the Express panel and NORMAPME commented on the draft reports. Our main achievement on this issue is that within the Express panel, almost every point submitted by NORMAPME was included in the Express Final Report issued on February 2010. Ms Karine Iffour and Mr. Gourtsoyannis also discussed with EC services at DG Enterprise (Mr. Ortun and Ms Weissenhorn) and with EFTA the possible re-shaping of the European standardisation system. In that prospect, we have provided inputs to Technopolis, the selected Consultant in charge of drafting an impact assessment study of the revision of the ESS analyzing 5 different policy options. NORMAPME has consulted SME associations about the review of the ESS on May 2010. Once the SMEs viewpoints were collected and summed up in an official position, NORMAPME answered the EC public consultation and provide the EC with our data.

A public hearing on the future of the standardisation system was organised on June 23rd 2010 by the Internal Market and Consumer Protection Committee (IMCO) of the European Parliament in relation to an own-initiative report conducted by MEP-rapporteur Edvard Kožušník. The hearing assembled important experts from major stakeholders in the field, including standardisation organisations, industry, and associations representing weak stakeholders.

EA: Director Gourtsoyannis was invited to comment on the importance of standardisation for European Small and Medium Enterprises, and to underline the obstacles faced by SMEs in terms of resources, information, access and representation. He focused on the need for institutional recognition and support for NORMAPME and other weak stakeholders, voting rights for these organisations, a balanced composition of TCs and WGs and SME oriented discounts for bundles of standards. The IMCO final report is expected to be voted on by the Committee at the end of September 2010 and submitted to the Parliament’s second plenary session in October. In parallel, the Commission is currently
working on a legislative proposal to revise the European standardisation system. The legislative package should be submitted to the Parliament and the Council for what was previously known as “co-decision” in December 2010.

Prior to this hearing, NORMAPME also participated in two working breakfasts with MEPs belonging to the European Parliament SME intergroup and the SME Union. We have also met various MEPs seating at IMCO committee in order to pave the way for the hearing: we presented our viewpoints and raised awareness about the needs of SMEs in the standardisation system.

The debates during the hearing showed MEPs have well understood SMEs needs and are concerned about their representation in the ESS. Rapporteur Edvard Kožušník, emphasized in his report some of our main propositions:

- Ensuring a balanced composition of TCs and WGs, institutional recognition and vote rights for NORMAPME and weak stakeholders in BT, TC and FV.

- SME oriented discounts for standards were also promoted as well as the integration of the WTO principles\(^4\) into the European legal framework for standardisation.

- The need to promote the inclusion of standardisation in education programmes.

At this point, NORMAPME is very satisfied with the positive and pro-SMEs attitude of the Parliament and will make sure the EC’s proposal will include the measures agreed during the hearing.

Meetings attended:

- 18th November 2009: meeting with EFTA (Gunnar Selvik and Tore Thomanssen)
- 4th December 2009: 98/34 extended Committee
- 7th December 2009: meeting with DG Competition
- 22nd January 2010: meeting with DG Enterprise (Mr Ortun and Ms Weissenhorn)
- June 2010: 5 meetings with MEPs seating at the IMCO committee have been scheduled to prepare the Hearing on the future of the European Standardisation system. These MEPs are: Ms Lara Comi, Ms Heidi Ruehe, Mr Edvard Kožušník, Mr Malcolm Harbour and Mr Mitro Repo.

**Protection of workers from Electromagnetic Fields**

**S&O:** the final objective here is to obtain the inclusion of a simplified risk assessment for the large majority of European enterprises and a “step-by-step” approach taking into consideration the factory processes applied by enterprises.

**EA:** NORMAPME has participated to the EMF workshop scheduled on 6th -8th October 2009 in Umea (Sweden). We informed the EC on that occasion that we were in favour of simplified procedures for complying with the limits. Mr Herbillon (DG for Employment, Social Affairs and Equal Opportunities)

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\(^4\) The WTO principles are the following: transparency, openness, impartiality, consensus, efficiency, relevance and consistency
took in due account our recommendations and included the point in his conclusive speech at the Umea meeting.

Moreover, the most recent TC meeting took place May 5th in Espoo, Finland. Two new documents were issued by the ICNIRP (International Commission on Non-Ionizing Radiation Protection), which provided the guidelines and exposure levels considered in the 2004/40/EC EMF directive. On the 20th of May 2010, the European Commission decided to launch the second stage consultation with the social partners at EU level as regards the possible amendment of Directive 2004/40/EC on minimum health and safety requirements regarding the exposure of workers to the risks arising from physical agents (electromagnetic fields). NORMAPME expert, Florent Liffran has formulated comments on the consultation with respect to the position of SMEs and will respond conjointly with UEAPME to the call for opinion and input by July 5th 2010.

Meetings attended:
- 10th September 2009 in Luxembourg
- 6th-8th October 2009, in Umea (Sweden)
- 5th May 2010, in Espoo (Finland)

Construction standing Committee
The Construction standing committee is in charge of applying the construction product directive (CPD).

S&O: NORMAPME’s aims are to make sure that standards that are not SME-friendly are not cited in the OJ and to minimize burdensome conformity requirements that products have to comply with.

EA: So far, Ms Karine Iffour representing NORMAPME in this committee has succeeded in postponing the standards on timber structures since they are not mentioned in the Official Journal. NORMAPME will keep striving for its non-adoption until these standards are adapted to SMEs’ needs. The preparatory meeting scheduled on April 16th 2010 was cancelled.

Meetings attended:
- 26th-27th January 2010 in Brussels. A preparatory meeting with CEPMC was also scheduled and attended.

Lifts Working Group

S&O: Within this Lifts WG, NORMAPME intends to represent the interests of lift installers concerning the upcoming revision of the Lifts Directive and especially on the impact of the PESSRAL (Programmable Electronic Components and Systems in Safety Related Application for Lifts) issue on SMEs. Our final objective for this year is to convince the relevant EC service to investigate further and to include the settlement of the PESSRAL issue in their work programme.

EA: NORMAPME is joining EFESME when denouncing the negative impact of the PESSRAL standards (Programmable Electronic Components and Systems in Safety Related Application for Lifts) on SMEs in
this sector. These standards allow lift manufacturers to place their products on the market without supplying the necessary information and equipments needed to adjust, maintain and repair them. Concretely, this would have allowed multinationals to sell lifts equipped with special electronic safety devices (PESSRAL) and get clients to sign exclusive maintenance contracts, forcing independent SME maintainers out of the market.

On April 2008 the EC had requested CEN to revise PESSRAL standards in order to include provisions for the supply of special tools and software to rescuers and maintainers. However, CEN has not yet started reviewing the standards, which is negatively affecting SMEs.

NORMAPME tried to convince the EC to include the settlement of the PESSRAL issue in their work programme and thus ensuring the voice of lifts installers is taken into consideration into the new Lifts Directive.

The PESSRAL issue has indeed been raised during a meeting, Ms Valentina Mauri attended with the European Commission. The issue was raised again at last Lifts Working Group (LWG), scheduled on 1st-2nd March 2010. During this last meeting, all members were invited to send their comments and observations to the proposed draft of the Lifts Directive recast by the end of April 2010. NORMAPME submitted its written comments to the EC, supporting EFESME position, on 30th April 2010. We focused our comments on Annex I Section 2.2.of the LD and proposed to modify it as follows: “The lift must be designed and constructed to prevent the risk of crushing when the car is in one of its extreme positions. The objective will be achieved by means of permanent free space or refuge beyond the extreme positions. However, in existing buildings, where this solution is impossible to fulfill, other appropriate means shall be provided to avoid the risk”.

Another important point highlighted in NORMAPME position concerns obligations for Installers as to the control of products already placed on the market, as required by clause 4.3 of the EC proposal. NORMAPME, as requested by EFESME, outlined that the above clause should not imply any obligation for the Installer as to the conformity of those lifts already placed on the market, whenever subsequent publication of new harmonised standards occurs.

Nevertheless, we noticed our points were not completely taken into consideration by the EC during last LWG, especially on art 2.2 of Annex 1.

Meetings attended:
- 10th November 2009 with Mrs Beata Pich (EC),
- 1st-2nd March 2010 the Lift Working Group in Brussels.

**Dangerous Substances EC Expert group**

**S&O:** the main objective for this group is to ensure that it will not produce requirements that do not already exist in Member States and that tools are available for SMEs to facilitate their compliance. The idea is to avoid unnecessary testing for SMEs (as they usually produce small series of products) and at the same time take due account of the complexity of some products.

**EA:** NORMAPME has decided to officially appoint Ms. Csilla Csiha as our expert at the Dangerous Substances EC Expert group. She has participated in two meetings in Brussels, on November 12th 2009
and on March 2\textsuperscript{nd} 2010. She is working under the supervision of Ms Karine Iffour. She reported that the requirements of a product will be limited to the Member-States requirements without any further addition. NORMAPME’s goals were achieved as the requirements of a product will be limited to the Member-States requirements without any further addition.

Meetings attended:
- 12\textsuperscript{th} November 2009 in Brussels,
- 2\textsuperscript{nd} March 2010 in Brussels.

**ICT Steering Committee**

**S&O:** Last July, the EC released a White paper on “modernizing ICT standardisation”. This White paper describes some of the changes which have taken place in the ICT standardization landscape and invites comments on actions to adapt to these changes. Our objective is to present the SME’s point of view in the consultation on the White Paper on “modernisation of ICT standardisation” and to ensure this is taken into consideration.

**EA:** NORMAPME prepared its response to the EC White Paper and sent it in September 2009. The issues raised by NORMAPME concerned in particular the treatment of Intellectual Property Rights (IPRs) within the standard setting processes. We supported the inclusion of a Royalty Free IPR approach and “ex ante declaration” of terms which may have positive effects on SMEs, whether they are new market entrants or standards users.

Since then, further discussions took place concerning the results of the public consultation and the next actions of the EC. The results of this public consultation enhanced the lack of consensus on the issues we raised and it is unlikely that our objectives will be achieved.

5 Meetings attended in Brussels:
- 29\textsuperscript{th} September, 2009
- 19\textsuperscript{th} November, 2009
- 10\textsuperscript{th} December, 2009
- 20\textsuperscript{th} January, 2010
- 29\textsuperscript{th} April, 2010

**EC public consultation on the revised rules for the assessment of horizontal cooperation agreements under EU competition law**

On May 4\textsuperscript{th} 2010, the EC launched a public consultation to receive the inputs from stakeholders on the revised draft rules for the assessment of horizontal cooperation agreements under EU competition law. The consultations concerned, inter alia, the revised draft of the so called “Horizontal Guidelines” on the applicability of article 101 of the Treaty on the functioning of the European Union to horizontal cooperation agreements. This revised draft includes an entire chapter (Chapter 7) dedicated to Standardisation agreements.
S&O: Our objective is to make sure SMEs are taken into account in this consultation and to report to the EC cases where SMEs are biased because of a restriction of competition due to standardisation activities.

EA: NORMAPME prepared a detailed position paper on Chapter 7 of the revised horizontal guidelines. This consisted of a case-study based analysis of standardisation agreements restricting competition, grounded on our experience within standardisation technical committees and working groups over the last ten years of NORMAPME activity. NORMAPME submitted its comments to the EC on June, 25th 2010. On July, 15th 2010 Ms Sara Gobbi, Mr. Gourtsoyannis and Mr. Toffaletti presented NORMAPME’s position paper to the EC during a meeting at DG COMP. The DG COMP officials who attended the meeting were very impressed about our contributions and asked us to provide them with suggestions on how to amend some paragraphs of the Horizontal Guidelines. Moreover, we were told that some of the cases presented in our position paper could be further assessed by DG COMP and encouraged us to directly contact their colleagues in charge for cases. We submitted to the Commission our proposal of amendments of the draft horizontal guidelines.

Meetings attended:
- 15th of July 2010: DG Competition

**EC proposal to align ten product harmonisation directives to Decision 768/2008 of the New Legislative Framework**

On 20/05/2010 the European Commission launched a public consultation on the proposal to align ten product harmonisation directives to the decision 768/2008 of the New Legislative Framework. The consultation concerns the marketing of electrical and electronic products, lifts, pressure equipment, measuring instruments, civil explosives, pyrotechnic articles and equipment for use in potentially explosive atmospheres.

S&O: Our main objective is that the SMEs friendly provisions included in the New Legislative Framework are properly implemented in the current revision of the New Approach directives.

EA: We consulted SME associations (see NORMAPME circulars no 29 -32-35-37) and drafted a consolidated position to be submitted to the European Commission within the new deadline for the public consultation which has been rescheduled on 15/09/2010. In particular, we recommended that the following principles were included in the ten directives to be aligned:
1. Facilitated assessment procedures for small series production
2. Scalability of conformity assessment procedures
3. Possibility for laboratories belonging to business associations to be accredited.

Within the frame of this consultation we had many contacts with SME associations and our experts by means of written communications (emails – letters), telephone conversations and brief meetings.
In particular we have also informed other stakeholders also representing SMEs on the opportunity of participating in the consultation (among others: ORGALIME, CEPMC, CECIMO, FIEC, CEFIC).

**Information and consultation activities for Activity 2.1:**
NORMAPME informed SMEs and their representatives on a regular basis. In particular on important issues such as the review of the European Standardisation system, the developments of the SMEs access project, the innovation management dossier. Finally, press releases on the recent creation of the SMEs Working Group, the issue of the EXPRESS final report and on the setting up of the CEN-CLC SMEs Helpdesk were uploaded on the website on a regular basis.

**Conferences attended for Activity 2.1**
- 8th September a conference on Energy labelling at Borschette center;
- 15th-16th October 2009, Interlifts conference, Augsburg;
- 18th November 2009 at the conference on ICT Standards Education;
- 19th November 2009 SMEST final event in Brussels;
- 2nd December 2009 Anniversary of the SBA at the EESC;
- 14th December 2009 “A Lead Market Initiative for Europe Protective Textiles Workshop”;
- 16th March Innovative highly productive and strong implementing energy efficiency Representation of North Rhine Westphalia (Brussels);
- 23rd March 2010 Energy Week, Brussels Energy management and energy efficiency standards
- 28th May 2010, SME week: CEN-CLC Open day
- 27th May 2010, SME week: Standardisation and SMEs Webinar
- 1st June 2010 SME week: the labour rights and responsibilities guide: CSR a matter of size?
- 10th June 2010: “Openness at the heart of the EU Digital Agenda”
- 1st June 2010: Intellectual Property, Open Source, and Standards: Friends or Foes?
- 22nd June 2010: SME Union Breakfast at the European Parliament on “the European standardisation: a way out of the crisis”
- 23rd June 2010: SME intergroup working breakfast
- 23rd June 2010: Public Hearing at the European Parliament on the future of standardisation

**Deliverables:**

a) Recommendations towards the EC have been issued on relevance basis
b) 21/20 Meetings attended
c) 16/15 Conferences attended (reports available upon request)
d) Documents were distributed when necessary

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Action 2 – Think Small First – Final Report
Milestones:

M2.1a: We have defined specific objectives and a strategy (S&O) to achieve them. It has been included in the description of activity 2.1.

M2.1b: An evaluation of our achievements (EA) based on our strategy has been accomplished and integrated in the description of activity 2.1.

M2.1c: Evaluation of quality and quantity of inputs received from consulted organisations:

EI: NORMAPME has managed to base all the interventions on inputs, data and examples received by SMEs and their representatives. In general, whenever a proper formal position was expressed by NORMAPME representatives, this has been preceded by a consultation with SME associations and other SMEs representatives. Those consultations have been carried out also in an informal way. In summary, NORMAPME has improved its consultation tools by sending Circulars for consultation beyond its membership and uploading the relevant information on its “SMEs Consultations” webpage (9 documents uploaded).

Even though those documents were available for comments by above mentioned stakeholders, not many inputs and information have been provided by non members. In particular, NORMAPME has observed that most of the European associations with which we managed to establish cooperation are reluctant to provide contributions on technical matters. Most probably this situation is due to the fact that similar collaborations need more time to become effective and to the fact that most EU associations do not have expertise on technical subjects.

On the other hand, it should be underlined many SME representative associations, both members and non-members, provided their inputs and comments to NORMAPME when the EC launched its online consultation on the review of the standardisation system. All the contributions were duly taken into consideration by the Secretariat when drafting the response to the consultation. Several SME associations (namely APCM, WKO, CEETB, EMU, ZDH, EFESME, ECAP and ORGALIME) have also shown much interest concerning the alignment of the ten directives to the NLF.

Finally, many members and non-member SMEs associations alerted NORMAPME about restriction of competition problems due to the misuse of standardisation agreements. Further to this, NORMAPME has elaborated and presented to the EC a comprehensive case-study analysis of standardisation agreements restricting competition, grounded on our experience within standardisation technical committees and working groups over the last ten years of NORMAPME activity. In that prospect, we have had several telephone calls and exchange of emails with EFESME and ECAP. The Commission seemed very interested in the problems we raised; hence they asked NORMAPME to submit its proposal to amend the so called “Horizontal Guidelines” on the applicability of article 101 of the Treaty on the functioning of the European Union to horizontal co-operation agreements as Chapter 7 is dedicated to standardisation agreements. More details and outcomes of our initiative will be available in the next few weeks.
2.2: Exchanging views and engagement with relevant stakeholders active in standardisation, certification and accreditation related matters:

NORMAPME advocated SMEs positions and sought collaboration with other stakeholders’ representatives in relevant bodies related to standardisation, certification and accreditation namely European Accreditation System (EA), International Accreditation Forum (IAF), and the EXPRESS Panel. NORMAPME has managed to intervene as frequently as possible through providing inputs, ideas, positions and comments on documents and to fora.

We have achieved our objectives within the Express Panel for the review of the standardisation system set up by DG Enterprise as most of the SME-friendly crucial points have been integrated in the EXPRESS final report released on February 2010.

NORMAPME has also mainly focused on the European Accreditation Advisory Board activities. We participated in the EAAB meetings as member of the Industry College.

Building on our previous active participation in the work accomplished within this college, NORMAPME committed to ensure a due implementation of the New Legislative Framework in the European Accreditation System especially when it comes to conformity assessment facilitated provisions for SMEs (REGULATION (EC) No 765/2008, art 8.10, DECISION No 768/2008/EC art 4). Hence, NORMAPME has put in place an EA SME Task Force (European Accreditation SME Experts Group) to submit ideas and suggestions to the EA responsible people in charge of translating the NLF into concrete accreditation and conformity assessment practices.

Nevertheless, although the work with our experts is fruitful, the EA SME task force should be maintained for next contract as it took us more time than expected to finalize the documents and receive comments from the EAAB. It is also important to note that this delay has had an impact on other related activities like the ones linked to the IAF.

Indeed, our EA SME TF documents have been put on the IAF agenda and will be discussed as soon as the documents are finalized and approved by the EAAB. Our activities within this forum have thus been delayed as well.

As for the EFCA activities, NORMAPME realized there was little interest in this activity for industry and SMEs in general. Discussions by industry participants confirm that the committee may not justify continuation.

Finally, NORMAPME decided not to participate in debates within IFAN the “European Branch of Standards Users Group” as our planned activities within this group depended on the status of our SME Guide. Indeed, NORMAPME intended to present and promote the SME Guide to IFAN. The SME Guide has finally been adopted by CEN-CLC the 8th of June. The presentation of the SME Guide is thus postponed to next year.

**European Accreditation Advisory Board (EAAB)**

**S&O:** NORMAPME is involved in the work the European Accreditation Advisory Board is carrying out on the implementation of Regulation 765/2008 and particularly concerning conformity assessments performed by CABs on SMEs (article 8.10).
In 2008-2009, we had underlined that the procedure for applying to membership to EA looks too complex and might create a burden for associations who may want to participate in consultations. The Board agreed that NORMAPME should put forward suggestions on how to tackle this issue. As a consequence NORMAPME has set up a Task Force to work in strict relation with the EA in order to guide the CABs when carrying out conformity assessment of SMEs. The Task force is composed of 4 experts coming from different sectors where SMEs are involved. It is also important to note that the experts were appointed following a call for experts and were thus suggested by SME representative associations. The EA SME TF’s objective is to produce 2 documents. First, it drafted guidelines targeted to NABs in evaluating the capacity of CABs to assess SMEs. The final version of the document is enclosed. The second document is a set of harmonized criteria on the way to implement conformity assessment procedures adapted to SMEs.

**EA:** The first documents took more time than expected to be finalized. Indeed, the first Guidelines document has been sent to the EA HHC and EAAB on 5th March 2010, one month later than expected according to our schedule. The Harmonised criteria is currently being drafted and will present 3 examples of successful collective schemes (sectors: windows, food, dentistry) to demonstrate that the concept of proportionality to the size of an undertaking can bring down the inspection time when the production is small, simple etc. One of our experts will also set up a risk analysis scheme using criteria (size, complexity, etc.). Our aim is to explain what proportionality means and to show how risk assessment can bring down the costs when the production is small, simple etc. During the last EAAB meeting on April 15th, we have received some feedback on our work and potential support from the other industry representatives namely Business Europe and ORGALIME. Unfortunately, the second document will not be finalized in due time and will be completed before September 2010. Next EA SME TF meeting is already scheduled for October 2010.

**Meetings attended:**

- 28th-29th October 2009: EAAB meeting
- 8th February 2010: EA SMEs Task Force experts meeting
- 15th April 2010: EAAB meeting
- 27th April 2010: EA SMEs Task Force experts meeting

**Expert Panel on Standardisation (EXPRESS)**

**S&O:** NORMAPME is actively involved in the review of the standardisation system notably through the EXPRESS panel. The Commission has established in January 2009 the Expert Panel for the Review of the ESS in order to revise its entire functioning coherence, financing and legal framework.

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5 NORMAPME’s four experts are namely: John Ryan (Certification Europe Ltd), Helmut Haybach (Association of wood joinery), Bob Salmon (Food Solutions Publishing Ltd) and David Smith (Phoenix Dental Castings Ltd)

6 HHC: Horizontal Harmonisation Committee
The recommendations of the Express Panel together with other inputs will lead the Commission to present a “Standardisation package” to the EP and the Council in December 2010.

**EA:** Mr. Gourtsoyannis has participated in three EXPRESS meetings and expressed SMEs concerns concerning the review of the standardisation package. On February 2010, the EXPRESS final report was released including most of the SME-friendly crucial points as well as recommendations in order to improve the accessibility to standards information and the participation of SMEs in standardisation work (transparency, controls on composition of the TCs, openness of the system and accessibility to SMEs). We consider having accomplished our tasks in this group in a proper and effective manner.

**Meetings attended in Brussels:**
- 9th-10th September 2009
- 15th October 2009
- 19th January 2010

**International Accreditation Forum Industry Consultation Group (IAF)**

**S&O:** Our aim is to extend our work in simplification of conformity assessment systems obtained at the EA level to the IAF through the EAAB interventions. The idea is to promote at international level the European gains in simplification for SMEs.

**EA:** In that prospect, our guidelines document on the use of adapted conformity assessment for SMEs elaborated within our EA SMEs task force, have been preannounced to the User advisory Committee (UAC) and will be submitted after receiving EA validation.

However, as the EA SME TF timeline has been revised due to some delay, the activity within this forum is also delayed.

On the other hand, NORMAPME achieved to obtain a better definition of the expectations from ISO 9000 including mention of “adapted conformity assessment to size and production system”. It will soon be adopted by IAF and ISO.

Finally, a strong warning to deter Corporate Social Responsibility certification with ISO 26000 has been introduced through a joint IAF ISO document. The proposal was made by Director Gourtsoyannis and has been submitted to both IAF management and to ISO. A decision is expected tentatively from the IAF in October 2010.

**Meetings attended:** (1 mission, 1 canceled)

NORMAPME was expected to attend one meeting of IAF.
- The IAF meeting scheduled for on October 2009 was cancelled due to low participation resulting in the revision of the number of meetings to attend for this action.
- The number of meeting to attend has been brought down to 8 instead of 9.
- Nevertheless, Mr. Gourtsoyannis attended the UAC the 9th of March in Paris.
International Federation of Standards Users European Group (IFAN)

S&O: NORMAPME originally planned to attend 2 IFAN meetings in order to explain the realities of SMEs to the major stakeholders seating at IFAN. Participating in IFAN debates was considered strategic as ESOs and ISO take into account its interventions and opinions.

EA: Nonetheless, our planned activities within this group have been significantly disturbed due to the delays accumulated in others related activities like the drafting of the SME Guide. Indeed, NORMAPME intended to present and promote the SME Guide in front of IFAN as soon as it is finalized. As a consequence, no IFAN meeting has been attended.

As reported in January progress report, we chose not to attend the IFAN meeting scheduled in Berlin on 27-28th October 2009 as it was not considered a crucial one.

Likewise, we considered irrelevant to attend the IFAN group meeting scheduled on April 26th in Geneva as our SME Guide took more time than expected to be adopted. The SME Guide has finally been adopted by CEN-CLC the 8th of June. The presentation of the SME Guide is thus postponed to next year.

European Forum for Conformity Assessment (EFCA)

S&O: NORMAPME is participating to the EFCA meetings in view of influencing the Conformity Assessment discussions in taking into account the need for simplified schemes of SMEs. We had envisaged putting our EA SME TF inputs on the agenda.

EA: However, although we had high expectations for this group, it turned out there is little interest in this activity for industry and SMEs in general due to the high number of certifiers in this forum. Considering these elements, in agreement with the other industry representatives, NORMAPME may not continue to attend EFCA.

Meetings attended:

EFCA meets in general twice a year in Brussels.
- 8th October 2009: One meeting was attended
- The meeting scheduled the 5th of May was postponed to September resulting in the revision of the number of meetings to attend for this action. The number of meeting to attend has been brought down to 7 instead of 8.

Improving cooperation with SMEs beyond NORMAPME constituency

NORMAPME has participated in fora and working groups on standardisation organised and led by other business associations also representing SMEs namely Orgalime CPD Task force and AIE Safety and Standardisation task force meetings. See Action 2.4 for more details.
NORMAPME has consulted other “relevant” European business associations on documents circulated for comments. For instance, in the framework of our work within the EA SME TF, we have contacted and asked Business Europe and ORGALIME, the other members of the Industry College at the EAAB, for comments and co-operation. These two organizations have provided their support to NORMAPME.

**Deliverables**

a) Once the extranet is established, documents received from the relevant fora and those documents integrating NORMAPME inputs will be made available by this means.

b) Attendance and contribution to 7/9 meetings (It is important to know that one EFCA meeting is postponed to September while one IAF meeting has been cancelled)

**Milestones**

a) Strategy and objectives (S&O): the document was finalised and included in the text.

b) An evaluation of our achievements (EA) based on our strategy has been accomplished and included in the text.

c) A quantitative and qualitative evaluation of inputs (EI) received from consulted organisations has been undertaken in month nine

**EI:** In the framework of activity 2.2, NORMAPME has focused its efforts on the setting up of a European Accreditation SME Experts Group (EA SME Task force) in order to guide the CABs when carrying out conformity assessment of SMEs. The idea is to submit ideas and suggestions to the EA responsible people in charge of translating the NLF into concrete accreditation and conformity assessment practices. The recruitment of the four experts composing the task force has been based on a call for experts (circular n° 61/09) and advice launched among SME representative associations. They have suggested qualified people working in different sectors where SMEs are well-represented: dentistry, food sector, wood industry. The last expert we selected was suggested by the Irish SME associations and is working in the certification services. The EA SME Task force benefited from the experiences of its members and has produced a valuable work that NORMAPME intends to promote at other levels: IAF for example. It is also important to note that we have also consulted other European organisations also representing SMEs for this task (notably for the call for experts). In particular, we have expressed our intention to work in close collaboration with the other organisations which are members of the EAAB Industry College namely ORGALIME and Business Europe. These two organisations have appreciated being consulted and informally promised to provide us with their support, inputs and comments on our work.

Regarding NORMAPME’s activities within the EXPRESS panel, we have made sure SME representative associations were informed of the developments of this important group whose reports would have an impact on the current review of the standardisation package. NORMAPME has elaborated and translated circulars on this subject (circular n° 4, 5, 6, 7/10) as well as headlines uploaded on the website including a link to the EXPRESS final report. Finally, NORMAPME’s activities within action 2.2 are bound to
accelerate since the SME Guide has now been adopted in June and is no longer blocking our action in IFAN. Likewise, the documents produced by our EA SME Task Force are being finalised and will be promoted actively through IAF.

2.3: Promote the “think small first” principle in the European Standardisation System

NORMAPME has represented SMEs’ interests in the relevant management bodies of the standards setting organisations (see details below).
NORMAPME had originally listed 11 activities to monitor but some changes were brought as new activities emerged and we realized others were not relevant anymore. Indeed, on one hand NORMAPME has decided to participate in 4 additional groups, namely: the Joint President Group, CEN BT WG 211 on balanced representation of stakeholders, ETSI STF and ETSI OCG. On the other hand, one activity was abandoned: CLC CA as we are not invited to attend. To sum up, NORMAPME is involved in a total of 14 activities to monitor resulting in a major involvement of NORMAPME staff in this activity compared to others. We have indeed overreached our objectives in the sense that we were able to attend 29 meetings for this activity instead of the 19 meetings target we agreed to attend.
Finally, we have informed SMEs on the activities of these groups when relevant and taken into account their comments so that NORMAPME’s positions are fully SME representative.

CEN & CENELEC General Assemblies

S&O: Follow the adoption of SME-friendly measures promoted through specific interventions at other levels i.e. BT, TCMG, TCs, WGs, FLESS, SME Access Project, NLF steering committees.

EA: CEN GA and CLC GA meetings which took place on November 2009, mainly dealt with the restructuring of the two organizations under joint management. On the margins of the meetings further promotion of the strategic goal of balanced representation, participation in the implementation of the SME Access project was achieved.
The first CEN-CLC GA meeting took place the 1st-3rd June 2010 in Malta. Director Gourtsoyannis represented NORMAPME in this event. During the joint conference, he stressed the need to have standards for SMEs easy to understand or simplified implementation manuals for complex standards.
On the margins of the GA, Mr. Gourtsoyannis was informed that resources available to implement the 58 recommendations resulting from the CEN-CLC SME WG promoting the SME access to standardisation, were limited. NORMAPME will thus closely monitor this issue in order to make sure the most important recommendations will be achieved.

Meetings attended:
- CEN GA 25th November, 2009
- CLC GA 16th November 2009
- CEN-CLC GA in Malta 1st-3rd June 2010
CEN CA

S&O: Follow the adoption of SME-friendly measures promoted through specific interventions at other levels i.e. BT, TCMG, TCs, WGs, FLESS, SME Access Project, NLF steering committees.

EA: On March, 11th 2010, Loucas Gourtsyannis took part in the CEN CA. Discussions were raised on the possibility of joint effort to finance awareness and promotion of standardisation at the national, sectoral and regional levels. NORMAPME will keep following the adoption of SME-friendly measures promoted through specific interventions at other levels (BT, TCMG, TCs, WGs etc.).

Meetings attended:
- 11th March 2010 CEN/CA Board Part II

CLC CA

We have decided to abandon this activity as NORMAPME was not invited to attend its meetings.

ETSI General Assembly (ETSI GA)

S&O: Follow the adoption of SME-friendly measures. The medium-term specific objective in the ETSI GA will be to ensure that the ETSI SME guide is adopted.

EA: On 24th and 25th November Ms Karine Iffour participated on behalf of NORMAPME in the ETSI General Assembly. Last year, she was elected Vice Chairman in ETSI. Karine Iffour also took part in the ETSI GA scheduled 29th-31st March 2010. She will keep pushing for the adoption of the ETSI SME Guide.

Meetings attended:
- 24th-25th November 2009 (Cannes)
- 29th-31st March 2010

ETSI Board

S&O: The main objectives of NORMAPME are to contribute to the re-thinking of the open source, preserve the possibility for EC/EFTA STF and monitor the work on SME access to standardisation in ETSI.

EA: NORMAPME is currently participating and monitoring the ETSI SME Access Working Group. We have welcomed the fact that the other STFs have managed to maintain their financing. NORMAPME has also decided to officially appoint Mr. Johann Steszgal as ETSI Board member. He took part in 4 meetings and is supervised by Ms. Iffour.
Meetings attended:
- 8th - 9th September 2009;
- 4th - 5th November 2009;
- 2nd - 3rd March 2010;
- 17th - 18th June 2010.

**ETSI STF 376**

**S&O:** Follow the adoption of SME-friendly measures.

**EA:** Mr. Sebastiano Toffaletti participated to the last ETSI standardisation initiatives for SMEs which occurred the 8th of July, 2010. During this meeting, the problems SMEs have with standardisation have been discussed as well as the role of associations in providing collective representation of SMEs interests. A proposal has been submitted to ETSI STF to make sure relevant sectoral associations are more involved and implicated in the group’s activities. NORMAPME intends to play an enhanced role within this group by providing the SME helpdesk as well as other sectoral associations such as PIN-SME

Meeting attended:
- 8th July, 2010 in Vienna

**CEN and CENELEC BT**

**S&O:** The main objectives are to promote balanced representation and to ensure that the SME guide is adopted. In addition, we strive for the creation of a working group dealing with the issue of balanced representation of stakeholders in the TCs.

**EA:** NORMAPME has strived and succeeded in obtaining the creation of a working group dealing with the issue of balanced representation of stakeholders in the TCs. This BT Working Group 211 on balanced representation as well as its Task force is in charge of identifying the relevant stakeholders. As for the SME guide, although its adoption was delayed, NORMAPME has monitored the CEN secretariat about the issue and the Guide has finally been adopted CEN-CLC the 8th of June. Concerning achievements at CLC BT, we succeeded in raising awareness (see enclosed presentation of Karine Iffour at last CLC BT) and preparing CLC to the adoption of the SME guide.

Meetings attended:
- 21st - 22nd October 2009 in Brussels,
- 17th - 18th November 2009,
- 23rd - 24th March 2010 in Brussels.
CEN CCB

S&O: only monitoring activities

EA: The activities were monitored.

Meetings attended:
- 9th October 2009, in Brussels

ICT Standards Board (ICT SB)

S&O: Our objectives are: gathering and distributing information about ICT standardisation projects at different SSOs, promoting better cooperation among SSOs; this includes for instance advocating for avoidance of duplications of works.

EA: NORMAPME is invited as observer to this group. We have used this opportunity to gather and distribute fresh information about ICT standardisation projects at different SSOs, and promoted better cooperation among SSOs. Although NORMAPME could not attend the 46th ICT Standards Board in Sophia Antipolis, inputs were provided to the board in written form prior to the meeting. Then, we attended the ICT SB meeting the 23rd of April 2010 in Milan and updated our position in these activities.

Meetings attended
- 23rd November 2009: we were unable to attend but inputs were sent to the board prior to the 46th ICT Standards Board in Sophia Antipolis
- 23rd April 2010: Rémi Orth attended the ICT SB meeting in Milan

CEN/TCMG

S&O: The objective is to ensure that SME’s interests are defended when TCs’ strategic issues are discussed.

EA: NORMAPME defended SMEs interest in TC discussions by ensuring that CCMC was aware of the problem related to the lack of candidate to take over the secretariat of CEN TC 254, TC of high importance for SMEs. We supported the allocation of the CEN TC 124 to AFNOR. This NSB already demonstrated to support SME views when they faced difficulties relating to timber standards. Ms Karine Iffour participated in the 40th BT/TCMG which took place the 3rd of December 2009 in Berlin while for the last CEN TCMG meeting; she was accompanied by Mr. Loucas Gourtsoyannis on 20th May 2010.
Meetings attended:
- 3rd December 2009: NORMAPME took part in the 40th BT/TCMG in Berlin
- 20th May 2010, Brussels

**Joint President Group (JPG)**

**S&O**: JPG is the ESOs highest political meeting. NORMAPME is attending this group as an observer to ensure SME-friendly decisions are taken at this level as well.

**EA**: We have successfully achieved to put on the agenda the issue of Innovation Management consulting services standardisation activities. Our views on innovation management were discussed and accepted. Unfortunately, NORMAPME’s proposition to have full membership in the new ICT SB mentioned here above was rejected.

Meetings attended:
- 10th December 2009, Brussels
- 4th May 2010, Brussels

**ETSI OCG**

**S&O**: NORMAPME deals with the coordination of many TCs which produce standards and other standardisation deliverables. NORMAPME wants to ensure that SMEs are provided with high quality services as ICT users.

**EA**: NORMAPME has achieved to maintain the financing of 3 STF developing standards which will help SMEs as ICT users to evaluate invoicing services. Basically, these STF should enable SMEs to increase the quality of their production with lower costs.

Meetings attended:
- 3rd November 2009 in Nice
- 16th June 2010 in Sophia-Antipolis

**CEN BT WG 211**

**S&O**: The WG will issue a document on balanced representation in TCs. Our objective is that SMEs are defined as stakeholders having specific and peculiar needs in the standardisation arena.

**EA**: NORMAPME has also managed to increase its number of experts coming from SMEs from 1 to 4. At the second meeting of the WG the team decided that balanced representation should be considered not
only in technical bodies but all along the standardisation process. As one of the main points was the stakeholders mapping in Technical bodies, a task force has been implemented to come with a proposal for the next meeting in Milan.

The outputs of the meeting in Vienna were very positive as SMEs were considered as a specific category having specific and peculiar needs in the standardisation arena. A draft system for expert nomination at different levels (mirror groups – TC – WGs) was produced.

During last BT WG 211, a Draft CEN/CENELEC Guide "Guidance for balanced representation in technical bodies" was circulated and is considered as the first version of the possible output of WG 211 work.

Meetings attended:
- 2nd December 2009 in Berlin;
- 2nd February 2010 in Brussels;
- 9th March 2010 in Vienna;
- 28th April 2010 in Milan;
- 23rd June 2010 in Brussels.

Information and consultation activities

When the Extranet will be ready, all the relevant working documents will be uploaded. We have forwarded documents relating to one of these working groups only to the associations which manifested their interest.

Improving co-operation with SMEs beyond NORMAPME constituency

Unfortunately, NORMAPME could not establish an extranet during the present contract. Consequently, we were unable to publish the relevant documents via this channel of communication for consultation by SME associations (we will send circulars until the extranet is operational by September 2010). However, whenever NORMAPME envisaged taking an official position on a document, we sent the position and the relevant documents to all SMEs representatives for consultation.

Deliverables

a) Documents were made available before meetings when relevant;

b) It was not necessary to draft official positions;

c) Attendance and contribution to 29/19 meetings is available on request.
Milestones

a) Strategy and objectives (S&O) was finalized and included in the analysis.
b) An evaluation of our achievements (EA) based on our strategy was accomplished and included in the analysis.
c) A quantitative and qualitative evaluation of input (EI) received from consulted organisations will be undertaken in month nine.

EI: NORMAPME has invested a lot in the activities of Action 2.3. Indeed, as new working groups relevant for SMEs emerged, we adapted to these changes and sent NORMAPME representatives to defend and promote SMEs interests.

In some specific cases, NORMAPME has decided to appoint experts as official representatives of NORMAPME: hence Mr. Johann Steszgal is now representing NORMAPME as an ETSI Board member. The appointment of Mr. Steszgal has been submitted to SME representative associations’ approval prior to his nomination at ETSI Board.

Finally, although the activities monitored within action 2.3 were not the object of any proper circular this year, documents were made available before meetings when relevant and on the request of the interested members or associations. The latter have reacted mainly on CEN BT issues and ICT policy for instance.

2.4: Cooperation with other business organisations

Although NORMAPME is the unique European organisation representing only SMEs in the standardisation system, other EU sectoral/horizontal organisations have SMEs among their membership. With regards to this, NORMAPME has worked hard to enhance its cooperation with other European associations representing SMEs. NORMAPME has implemented some actions aimed at including in its consultation processes as many SMEs’ representatives as possible.

Consulted stakeholders are all NORMAPME member associations, all UEAPME member associations, European industry associations whose membership also includes SMEs and any interested stakeholder representing SMEs.

It should also be noticed that NORMAPME collaborate with these European associations following a step-by-step process which means NORMAPME cannot bypass them and reach directly their SMEs. Hence, NORMAPME meets these associations (also) representing SMEs on a regular basis in order to collect their SMEs’ viewpoints. Although our collaboration is mainly fruitful and cordial, co-operation is sometimes tainted with suspicion. NORMAPME is currently working on this matter in order to ensure a smooth collaboration with its partners.

In addition, letters requesting meetings and their follow-up have been drafted and sent in due time to relevant associations. With the identified organisations we met “officially” once or twice during the year in order to discuss our strategy, working plan or common projects.
Relevant e-mail exchanges and phone calls on different topics of cooperation have occurred, mainly on Innovation management, EAAB issues, Express panel developments, CEN BT issues, ICT policy, safety of swimming pools, Voltage characteristics of electricity and standards implementation guides.

Considerations regarding meetings between NORMAPME and Other European organisations

NORMAPME has met several European associations also representing SMEs during the year to discuss and identify common interests and concerns. These meetings mainly dealt with the review of the standardisation package (the second row of meetings occurred in June and July after the EP hearing on the future of the standardisation system). Basically, NORMAPME has presented its position and collected the comments and suggestions from these associations.

NORMAPME has also raised the subject of accreditation and the work of its EA SME Task Force with ORGALIME and Business Europe, as mentioned in action 2.2.

Finally, NORMAPME discussed with AIE the terms of our upcoming collaboration which consists in drafting a manual aimed at SMEs in the electrical installation sector.

Although the targets and objectives included in the July proposal have been respected and regularly updated NORMAPME encountered some difficulties in action 2.4: meetings with European associations also representing SMEs. NORMAPME’s intent to collaborate with EU organisations also representing SMEs is sometimes tainted with suspicion.

Indeed, during meetings with some European organisations also representing SMEs, we have noticed certain mistrust from these organisations as they question NORMAPME’s objectivity. One association has indeed admitted it doubted NORMAPME’s neutrality as we are mainly financed through EU funds.

Such a lack of confidence between NORMAPME and its partners is unhealthy and needs to be overcome to ensure a smooth cooperation and common objectives.

Besides, NORMAPME dispatched the questionnaire indicated in activity 2.4 to improve cooperation and our communication strategy. Unfortunately, despite our insistence, it should be underlined that NORMAPME did not receive many answers from European associations also representing SMEs (among the 18 targeted associations, only 7 of them have replied). However, as underlined in this report, we received suggestions on the way to improve cooperation from the most interested associations.

NORMAPME intends to continue explaining the purposes and activities of NORMAPME in order to be as representative of the SME community as possible.

Evaluation on the status of cooperation between NORMAPME and European Trade associations also representing SMEs

During the last 18 months, NORMAPME placed great value in enhancing its communication strategy in order to improve its cooperation with the other European business associations also representing SMEs. Sometimes this has led to success stories, while in some other cases we verified there was no real interest in pursuing the objective of enhancing the cooperation.

In order to redefine our cooperation strategy, we decided to:

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- assess the effectiveness and appropriateness of our communication strategy as well as its perception by counterparts through a questionnaire;
- assess the status of the ongoing cooperation based on concrete results and achievements.

NORMAPME has consulted business associations also representing SMEs through a questionnaire. The questionnaire was dispatched directly to all 18 business associations included in Annex. Among those EU business associations, 7 of them have replied: FIEC, EUROCHAMBRES, ORGALIME, HOTREC, CLECAT, EURATEX and AIE. Their replies are available under request. All the associations which answered the questionnaire recognised having received information and having been contacted by NORMAPME’s staff on a regular basis. They are content about the current situation and unanimously expressed their wish to keep receiving information from our side. All the associations were overall satisfied with their cooperation with NORMAPME, in particular on general political topics like innovation management and the review of the standardisation package. However, HOTREC and AIE specified that their cooperation with NORMAPME being revisited quite recently, they consider it is too early to give an appreciation. One of the main concerns relates to a lack of targeted information: in general European business associations consider they receive too much information which is not necessarily relevant to their business sector. In addition, business associations rarely forward the information they receive from NORMAPME to their own members. Moreover, 3 of them admitted they have never forwarded any information from NORMAPME to their members. With regards to the relevance of information provided by NORMAPME, the respondents listed the topics they wish to receive information about: this mainly includes rather political issues relating to the European standardisation policy.

Apart from the results of the questionnaire, NORMAPME has observed that most of the associations with which we managed to establish cooperation are reluctant to be consulted on technical matters. Most probably this situation is due to the fact that similar collaborations need more time to become effective and to the fact that most EU associations do not have expertise on technical subjects.

Follow-up and corrective measures:

**Improving the communication strategy:**

Suggestions and remarks on how to improve our cooperation by means of communication mainly relate to:

1) better targeting the information to the relevant stakeholders;
2) preferring verbal communication in order to avoid overload of e-mails/circulars;
3) regularly updating NORMAPME distribution lists.

Hence, NORMAPME plans to improve its website and to provide access to an extranet to interested business associations.

Finally, NORMAPME staff will contact by phone on a more regular basis the relevant European business associations on the topics they are interested in.

**Selection of partners**

Following the analysis of the EU business associations’ replies to our questionnaire, and to the feedbacks we received by these stakeholders during the last 18 months, NORMAPME has intensified the
cooperation with the following organizations: ORGALIME, BusinessEurope, FIEC, CEPMC, AIE, CLECAT, EUROCHAMBRES, EURATEX, CECIMO, DIGITALEUROPE and HOTREC. As a consequence, the number of meetings with EU business associations also representing SMEs has been revised in that sense. Its number has been lowered to 16 meetings. Besides, these selected partners have been addressed with regular and targeted updates as well as calls for cooperation on sectorial political issues on which they manifested their interests, namely:

**ORGALIME:** construction product regulation implementation, review of standardisation package, innovation management;

**FIEC:** construction product regulation implementation, review of standardisation package, innovation management;

**Business Europe:** General EU standardisation policy;

**CEPMC:** CEN BT, construction issues, Construction standing committee;

**AIE:** standardisation of electrical installations, opportunity to draft implementation guides.

**CLECAT:** intelligent transports’ standardisation issues;

**EUROCHAMBRES:** innovation management, review of standardisation package;

**EURATEX:** standardisation of textile sector, standardisation policy;

**CECIMO:** general issues of standardisation policy;

**DIGITALEUROPE:** ICT policy and standardisation;

**HOTREC:** CEN BT, TC ISO 228, project of standards for beauticians in SPA and Wellness centers.

The others will continue receiving the bi-monthly newsletters.

Nevertheless, NORMAPME remains open to any EU business associations also representing SMEs and willing to cooperate in the future.

**Meetings planned for Activity 2.4**

We have participated in 4 meetings-fora-events organised by business organisations with which we collaborate. NORMAPME took part in AIE Safety and Standardisation task force meetings on 23rd October 2009 Orgalime CPD Task Force on 9th September, 23rd October 2009 and 24th March 2010. Finally, we organized and attended 16 official meetings with business associations also representing SMEs in Brussels namely: Orgalime, CLECAT, EVA, Business Europe, TIE, AIE, Digital Europe, HOTREC, FIEC, CECIMO, EURATEX and CEPMC.

In addition, an informal meeting (not counted) with staff of Eurochambres was attended to discuss some sensitive political subjects. An official meeting with European Vending machines Association (EVA) was also scheduled on their initiative to discuss the ecodesign issue.

It is important to note that following a thorough evaluation of the status of cooperation between NORMAPME and European Trade associations also representing SMEs, the number of official meetings with these organizations has been revised.

**16 Meetings for enhancing cooperation have already been attended**

ORGALIME, 1 meeting

CEPMC, 2 meetings
EURATEX, 2 meetings
CLECAT, 1 meeting
BusinessEurope, 1 meeting
FIEC, 1 meeting
CECIMO, 2 meetings
HOTREC, 2 meetings
Digital Europe, 1 meeting
TIE, 1 meeting
AIE: 2 meetings.

Although AIE is an indirect member of NORMAPME, a couple of meetings have become necessary to prepare our upcoming cooperation concerning the drafting of a SME manual in the field of electrical installations.

Informal meetings with:
EVA on their initiative to discuss issues related to ecodesign of energy-related products.
Eurochambres

**Deliverables**

a) 1 list of business associations (Annex II) including revised planned cooperation;
b) 19/26 Letters of invitation for official meetings;
c) 14/26 Follow-up letters of official meetings including the follow-up letters of 2 meetings (EUROCHAMBRES, AIE) which occurred at the end of the previous contract 2008-2009. It is also important to note that the meetings with CECIMO did not require any written summary;
d) 16 official meetings attended European Associations also representing SMEs
e) 4 meetings-working groups organised by business organizations;
f) Regular e-mail exchanges on topics of cooperation with EU business associations;

**Milestones**

a) M2.4a & M2.4d: The questionnaire (EQ) for analysis and improvement of the co-operation has been dispatched (enclosed). Results were collected in February 2010 and the analysis of the results has been integrated in the text;
b) A revision and analysis of the list of business associations has been undertaken in advance (was planned at month 9) on the basis of the corrective measures mentioned above;
c) An evaluation of the quality of co-operation is already included here above.
An overview and moving forward

NORMAPME accomplished the tasks defined in this project and achieve all the main objectives.

NORMAPME has been actively involved in policy making activities and promoted the “think small first” principle in the processes having impact on standardisation.

Among all activities undertaken by NORMAPME, those related to the revision of the European standardisation system at the European Commission and at the European Parliament that will have a higher impact on the on the future standardisation landscape as regards SMEs. In this context, the responses of policy makers to the issues and proposals brought forward by NORMAPME were certainly very positive and create many expectations for the results of such revision.

As a consequence, it is considered very important that NORMAPME maintains its activities related to the ongoing revision of the system and, if possible, even make them more intense.

On another angle, Action 2/2009 has seen the strengthening of the collaborations of NORMAPME with all the major industry representative associations at EU level. Factual cooperation has been established on many practical matters, like exchange of information and alignment of positions, and has been appreciate as beneficial by the two sides, both NORMAPME and the interested associations. However, on a more political level such relationships are still sometimes tense and often tinted with jealousies and suspicion.

The fact that it was possible to establish factual cooperation on an operational level shows that any pre-existing biases can be bypassed and mutual benefits are possible. It is hence advisable that NORMAPME continue intensifying its collaborations with industry associations and that it tries to make these relations more formal by the signature of partnership agreements.

On an overall level the available resources have been used, with minor rearrangements among different activities, and a slight increase budget for the continuation of such activities would be useful.

Annexes

Annex I – NORMAPME Position on the review of the standardisation system
Annex II – NORMAPME Position revised horizontal guidelines on standardisation
Annex IV – NORMAPME Harmonised criteria (second document of the EA SME Task Force)
Annex V – Associations for enhanced cooperation-revised planned cooperation (July 2010)

Annex VI – Management tool 2010 cooperation with other EU trade associations

Annex VII – Questionnaire to non-member organisations