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# A strong European policy to support Small and Medium- sized enterprises (SMEs) and entrepreneurs 2015-2020 Public consultation on the Small Business Act (SBA)

Fields marked with \* are mandatory.

## Introduction & background

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Since its adoption in 2008, the Small Business Act (SBA) has proven its worth as a policy tool in support of the small and medium enterprises (SMEs). Various initiatives have been taken at both EU and national level to improve the environment in which these businesses operate and help them grow.

It is now time to reflect on what can be done in the years that lie ahead to make life easier for SMEs.

The Commission has drafted a consultation document including the on-going measures and the new proposals (see the link below).

This consultation is designed to collect feedback on the new initiatives set out in the consultation document.

**Please read it before you complete the questionnaire.**

Consultation  
document

## 1 - About you

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1.1 - Are you replying as/on behalf of:\*

- ☐ An EU citizen
- ☐ An individual company
- ☐ A national business organization
- ☐ A European business organization

- ☒ A national authority
- ☐ A regional authority
- ☐ Other

## 1.2 -

Please give your name/ the name of the company/organization/authority\*

## 1.3 -

Please give your e-mail address

## 1.4 -

Your country\*

- ☐ Austria
- ☐ Belgium
- ☐ Bulgaria
- ☐ Cyprus
- ☐ Czech Republic
- ☐ Denmark
- ☐ Estonia
- ☐ Finland
- ☐ France
- ☐ Germany
- ☐ Greece
- ☐ Hungary
- ☐ Ireland
- ☐ Italy
- ☐ Croatia
- ☐ Latvia
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☒ Netherlands
- ☐ Poland
- ☐ Portugal
- ☐ Romania
- ☐ Slovakia

- ☐ Slovenia
- ☐ Spain
- ☐ Sweden
- ☐ United Kingdom
- ☐ Other

1.5 -

How do you want your contribution to appear on the Commission's website?\*

- ☒ **Under the name supplied** (I consent to the publication of all information in my contribution, and I declare that none of it is subject to any copyright restrictions that would prevent publication.)
- ☐ **Anonymously** (I consent to the publication of all information in my contribution except my name/the name of my organisation, and I declare that none of it is subject to any copyright restrictions that would prevent publication.)
- ☐ **I do not want my contribution to appear - please keep it confidential** (It will not be published, but used internally within the Commission.)

## 2 - Reducing the administrative burden

2.1 How important is a new EU regulation on regulatory simplification, designed to ensure the following in all EU countries?

	Very important	Important	Less important	Not important at all
Setting up a company at a maximum cost of €100 & within 3 days	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Obtaining the licenses needed within 1 month	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Making the application of the "SME Test" or an equivalent system mandatory in all EU countries	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring that national laws provide for a discharge within 3	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

years at most for entrepreneurs  
who have gone bankrupt

2.2 - An EU-wide campaign to cut red tape for SMEs  
is\*

- ☐ Very useful
- ☒ Useful
- ☐ Not very useful
- ☐ Not useful at all

2.3 - Explore the  
possibility of lowering the transaction costs/fees for SMEs to facilitate their  
access to industrial and intellectual property is\*

- ☒ Very useful
- ☐ Useful
- ☐ Not very useful
- ☐ Not useful at all

2.4 -

Improving consultation at an early stage of SMEs (and the  
organizations representing them) about burdensome legislation, focusing on  
implementation procedures at EU and national level, is\*

- ☒ Very useful
- ☐ Useful
- ☐ Not very useful
- ☐ Not useful at all

2.5 - Encouraging EU

countries to simplify tax procedures for new companies in their start-up phase  
to reduce administrative burdens and help them develop faster is\*

- ☐ Very useful
- ☒ Useful
- ☐ Not very useful
- ☐ Not useful at all

2.6 - Identifying

and addressing bottlenecks in national legislation which  
impede SMEs to grow

is\*

- ☐ Very useful
- ☒ Useful

- ☐ Not very useful
- ☐ Not useful at all

## 2.7 Any further suggestions or comments?

*1,500 character(s) maximum*

The Commission proposes to review the guidelines on impact assessments with specific attention to mainstreaming the SME Test, and to encourage Member States to systematically introduce the SME Test or an equivalent system in their decision-making process. These actions, are highly supported by the Netherlands. In addition to these actions, the Netherlands would like to propose two additional areas in which action could be taken. First, we would like to see a shift in a focus on administrative burdens towards (substantive) compliance costs. Secondly, the Netherlands would like to see that the Commission focusses on reducing the administrative burdens and compliance cost of European legislation by establishing exceptions for SMEs for new and/or existing rules and regulations on the European level. In case this is not possible, we would like to see a simplification of these rules and regulations.

Inviting member states to fully commit to the targets of €100 of cost and three days for starting up a company and to the target of one month to have the necessary licenses is a good initiative. We do want to stress that the Commission should focus on self-employed SMEs and not on private limited companies. In practice most SMEs are self-employed. In the Netherlands, a self-employed business can be set up within a day and below €100. However, when it comes to setting up a private limited, this takes more time and costs more because the notary is involved.

## 3 - Access to finance

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### 3.1 - Strengthening the venture capital market in Europe (through legislation and by other means), so as to attract private institutional investors back to the markets, is\*

- ☒ Very useful
- ☐ Useful
- ☐ Not very useful
- ☐ Not useful at all

### 3.2 - Mobilising all the funds allocated to the financial instruments under COSME so that

at least 220 000 SMEs in the EU benefit from improved access to finance (EU-supported venture capital funds, guarantees and counter-guarantees) is\*

- ☒ Very useful
- ☐ Useful
- ☐ Not very useful
- ☐ Not useful at all

### 3.3 How important

are the following initiatives in developing alternative sources of finance?

	Very important	Important	Less important	Not important at all
Removing obstacles to crowd-funding & raising awareness about its risks and benefits and how SMEs can access it (through information, events, forums for those potentially interested, etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further developing & spreading mezzanine financing (hybrid, i.e. debt/equity, form of financing) by sharing best practices & setting up discussion forums on the subject	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Disseminating good practices in the field of supply chain finance through awareness-raising activities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

3.4 - Helping to revive EU securitisation markets through appropriate legislation is\*

- ☐ Very useful
- ☒ Useful
- ☐ Not very useful
- ☐ Not useful at all

### 3.5 - Increase

cooperation with financial institutions to raise awareness of EU financial instruments for SMEs by signing agreements with relevant EU and national associations is\*

- ☒ Very useful

- ☐ Useful  
☐ Not very useful  
☐ Not useful at all

### 3.6 Any further suggestions or comments?

1,500 character(s) maximum

Access to finance is vital for SMEs' and the economic growth in Europe. In many Member States, SMEs are reliant on banks as their main source of finance. Banks will continue to be essential in providing credit to companies, but the rejection rates rose during the crisis in most countries and there is a significant risk that as economic growth returns, banks will be unable to meet the funding gap. Therefore, more options and diversification in the supply of finance is necessary. Despite the existing financial instruments or alternatives to traditional bank lending, SMEs are often either not aware of them or do not know how to access funding. Thus, every effort should be undertaken to strengthen the dissemination of information on the existing financing possibilities. The Netherlands supports the initiatives suggested by the Commission: all new legislative proposals regarding financial market legislation should not adversely affect the interests of SMEs; public administrations should facilitate the emergence of alternative sources of SME financing (such as crowd funding, venture capital, business angels, etcetera); and all stakeholders should further disseminate best practices (e.g. on mezzanine financing, securitization, guarantees and supply chain financing).

## 4 - Promoting market access for SMEs

### 4.1

How important are the following initiatives in improving access to the EU single market for SMEs?

	Very important	Important	Less important	Not important at all
Upgrading the Enterprise Europe Network by developing local cooperation with SMEs stakeholders & providing new services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Setting up a European Resource Efficiency Excellence Centre to inform & advise SMEs & provide support on this field	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Helping some 100 less-advanced cluster organizations to develop customised support services for SMEs through twinning schemes with advanced cluster organizations - by 2020	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

4.2 Developing an integrated Commission strategy to help SMEs do business outside the EU (to increase the percentage of such firms up to 20% by 2020)\*

- ☐ Very useful  
☐ Useful  
☒ Not very useful  
☐ Not useful at all

4.3 Exploring the option of targeting policy measures on mid-range companies (firms with over 249 employees) to help them expand their international business is\*

- ☐ Very useful  
☐ Useful  
☐ Not very useful  
☒ Not useful at all

4.4 Any further suggestions or comments?

1,500 character(s) maximum

In the area of access to markets several new initiatives are mentioned. First of all, when it comes to internationalization the Enterprise Europe Network (EEN) is a valuable network for disseminating information on doing international business. The Netherlands would like to suggest that the upgrade of the network should mainly concentrate on making the network services more effective. Also, the Netherlands would like to emphasize that further expanding the network to third countries and increasing the number of Missions for Growth outside the EU are not considered as priorities.

Removing barriers in the Single Market should remain the focal point of

EU-activity in the area of access to markets. The Netherlands has emphasized the importance of taking further steps in the areas of services and the digital single market on several occasions. We therefore encourage further action of the EU in these areas.

## 5 - Releasing entrepreneurial & innovation potential for growth

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5.1 - Scaling up the "Erasmus for Young Entrepreneurs Programme" from 800 to 10 000 exchanges a year by 2020 is\*

- ☐ Very useful
- ☒ Useful
- ☐ Not very useful
- ☐ Not useful at all

5.2 - An

EU-wide Early Warning Platform for stakeholders and experts to provide counselling to business in difficulties and help viable companies surmount the crisis, save jobs and avoid bankruptcy is\*

- ☐ Very useful
- ☒ Useful
- ☐ Not very useful
- ☐ Not useful at all

5.3 - Setting

targets for all EU countries to integrate entrepreneurship into secondary school curricula as a key subject by 2018 is\*

- ☐ Very useful
- ☐ Useful
- ☐ Not very useful
- ☒ Not useful at all

5.4 - Ensuring

that the on-line platform for women entrepreneurs (to be launched in 2015) becomes a recognised and used one-stop shop involving local, national & EU stakeholders is\*

- ☐ Very useful
- ☐ Useful
- ☒ Not very useful

- ☐ Not useful at all

5.5 -

Consulting entrepreneurs throughout Europe to collect ideas for new initiatives to promote entrepreneurship and youth start-ups is\*

- ☐ Very useful  
☒ Useful  
☐ Not very useful  
☐ Not useful at all

5.6 -

Supporting EU countries and regions to develop models for start-up and growth centres and promoting these models is\*

- ☐ Very useful  
☒ Useful  
☐ Not very useful  
☐ Not useful at all

5.7 How important

are the following initiatives in facilitating the transfer of business?

	Very important	Important	Less important	Not important at all
Urging EU countries to put in place national action plans on business transfers and have a one-stop shop on transfer or a transfer of business element in existing one-stop shops by 2017	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Developing and spreading "Quality Standards" for online markets for business transfers & encouraging the linkages between already existing cross-border matching platforms	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Facilitating EU-wide networking to encourage exchanges between researchers & practitioners; setting up a European Mentors Network for Transfers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Supporting an EU-wide matching platform for universities/business schools focusing on business transfer	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
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5.8 How important are the following measures in supporting the Commission's new clusters strategy?

	Very important	Important	Less important	Not important at all
Promoting and supporting business management innovative models, also through initiatives aimed at developing new managerial skills for SMEs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Bringing together cluster policy-makers in a European Cluster Growth Policy Platform, to share policy experience & develop a shared methodology for cluster policy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Setting up a regular dialogue on emerging industries with SME communities and business support & clusters practitioners	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

5.9 Any further suggestions or comments?

1,500 character(s) maximum

The Netherlands encourages new actions to further promote entrepreneurship and to improve the framework conditions for SMEs. We would like to encourage the Commission to not merely focus on establishing an increase in the number of SMEs in Europe, but to pay particular attention to the growth of existing companies in terms of employment, productivity and innovation.

Giving priority in providing a second chance for honest entrepreneurs is important. Furthermore, it is imperative to make sure that in case of fraudulent activities have taken place action is taken. The stigma that rests on bankruptcy is mainly caused by fraudulent activities that are not dealt with.

Finally, the Netherlands does not support further action for the promotion of measures aimed at young entrepreneurs, female entrepreneurs, senior entrepreneurs and other "types" of entrepreneurs. Entrepreneurship policy in the Netherlands focuses on increasing the quality and the level of ambition of entrepreneurship. At the core of this policy is the idea that it is more important what you do, than where you come from, if you are male or female, or other differences. We therefore emphasize making sure that everyone has access to the general instruments for entrepreneurship.

## 6 - Boosting skills development

### 6.1 How important is to launch a

Commission initiative, comprising employment, education & enterprise dimensions, to overcome the shortage of skilled labour by promoting the following measures?

	Very important	Important	Less important	Not important at all
Training schemes for skilled workers directly involving SMEs from the concerned sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
A dual system in vocational training	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
A better image of skilled crafts & technical jobs in SMEs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

### 6.2 Any further suggestions

or  
comments?

*1,500 character(s) maximum*

When it comes to promoting entrepreneurship and improving the framework conditions, skills and education are very important. Especially, the exchange of best practices should be encouraged in this respect. Specific action at the European is not very desirable as there are many differences between education systems throughout the European Union (EU). A promising example of action that has been taken in this area in the Nether

lands, is the establishment of the National Technology Pact, which was signed last year by 60 organizations from education, employers, labor unions, regions and national government. The purpose of the National Technology Pact is to tackle the lack of skilled personnel and to improve the (qualitative) match between supply and demand for labor.

Concluding remarks: The Netherlands considers Entrepreneurship policy a matter of national competence. Each Member State has its own challenges to entrepreneurship and must address these issues at a national level in accordance to their situation. We consider it important that any action at European level are limited to areas where there is a clear added value and impact of a European approach. We see a clear European added value in supporting access to finance for entrepreneurs, reducing administrative burden, strengthening the internal market, stimulating innovation and an open and competitive market.

### Contact

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