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THE REVIEW OF THE EUROPEAN STANDARDISATION SYSTEM

A great opportunity for European SMEs

NORMAPME is the European association representing Crafts and Small and Medium-sized enterprises (SMEs)¹ in the standardisation system. NORMAPME was created in 1996 under the joint initiative of the European Commission and of UEAPME. This was to answer the need for SMEs to have their concerns better represented in standards and in the standardisation process.

According to its statute, the members of NORMAPME are European or national SME associations. Currently 20 organisations are listed as members, including UEAPME, the cross sectoral European SME organisation recognized as Social Partner in Europe.

All together, the members of NORMAPME represent over 12 million SMEs with nearly 55 million employees in all EU and EFTA countries and cover all sectors concerned by “New Approach” directives, the Construction Products Directive, as well as other sectors affected by standards (e.g. ICT, cosmetics, tourism, etc.).

The network of NORMAPME includes more than 90 organisations consisting of national cross-sectorial SME federations and European branch federations which support the SME family.

The positions of NORMAPME are developed through the consultation of members (more than 12 million SMEs) and other European Industry associations having SMEs in their memberships on a draft discussion paper and the subsequent collection and assessment of inputs and comments.

¹ http://ec.europa.eu/enterprise/policies/sme/facts-figures-analysis/sme-definition/index_en.htm

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1. National delegation principle: is it good for SMEs?

Stakeholders' participation in the standardisation works of CEN and CENELEC currently takes place through the **national delegation principle**, according to which each Technical Committee corresponds to national Mirror Committees managed by the National Standards Bodies in every Member State.

The national delegation principle, being based on openness and democracy, should be maintained. In particular, National Standards Bodies enable SMEs to participate in their own language and with reduced travel costs.

However, recent studies and reports have confirmed that the participation of SMEs in standardisation is still insufficient compared to their weight in the European economy and that **further support to their representation at national and at European level is needed**².

Besides, the Small Business Act for Europe clearly expresses the Commission's political will to recognise the central role of SMEs in the EU economy, thus explicitly encouraging SMEs' participation in standardisation.

The problem of under-representation of SMEs in standardisation has been fully acknowledged by the European Commission within its proposal for a "Standardisation package" presented on the 1st of June 2011 (see *recital n.14, COM(2011) 315*³; and par 3.2.1 of Impact Assessment *SEC(2011) 671*)

²

- *[...] but the difficulties for some key stakeholders (SME, consumer, environmental and trade union interests) to participate in the ESS through national delegations were stressed in the EIM study. Participation of these stakeholders at national level is weak in many countries for several reasons. In order to address this weakness – and so guarantee the relevance of the European standards process built on national delegations - it has been recognised since the 1990s that it is essential to ensure participation of these stakeholders directly at European level (EXPRESS Report "Standardisation for a competitive and innovative Europe: a vision for 2020", February 2010)*
- *The participation of SMEs and societal stakeholders can be hampered by a lack of resources and technical expertise. This can, in turn, affect the consensus reaching process and therefore cause delays in standards development. The Commission is therefore providing financial support to European organisations and associations representing SMEs and societal stakeholder interests. This enables them (as associate members in the European Standards Organisations) to participate more effectively in the standardisation process at the European level and to co-ordinate the involvement of all national experts in the standardisation development process. There is for example a need to look into the characteristics of the SMEs that do indeed participate. Certifiers and consultants might be registered as SMEs, whereas their position in the standardisation process is quite different from small engineering companies when discussing for example machine safety standards ("SMEs and standardisation in Europe. 23 good practices to promote the participation of craft and SME enterprises in standardisation and the use of standards", EIM Business & Policy Research, Zoetermeer, October 2006).*

³ - *European standards are of vital interest for the competitiveness of SMEs which, however, are in general under-represented in standardisation activities, in particular at European level. Thus, this Regulation should ensure an appropriate representation of SME in the European standardisation process by an entity with appropriate qualifications. (recital n.14 COM(2011) 315)*

Indeed, the national delegation principle does benefit and should continue to benefit - as a complementary tool – from the valuable activity carried out at European level by NORMAPME in its capacity as SMEs representative organisation⁴.

2. What can the experts of NORMAPME do for SMEs?

NORMAPME is entitled to appoint experts coming from SMEs directly to the Technical Committees of the European and international standards bodies.

Thanks to this role, NORMAPME has managed to appoint SME experts in 57 Technical Committees at CEN, CENELEC, ETSI and ISO⁵ so far; in doing so, NORMAPME is alleviating the under-representation of SMEs in these standardisation areas. It is important to note that in most of these 57 Technical Committees the SME expert appointed by NORMAPME is the only representative of SMEs.

Hence, the role of NORMAPME at European level does not replace but rather complements the role of National Standards Bodies, thus giving a further opportunity to SMEs to be involved in the standardisation process.

The experts of NORMAPME are appointed through a transparent procedure consisting of an open consultation with national and European SME associations. The calls for experts are also made public through the website of NORMAPME.

The experts of NORMAPME are supported by mirror committees composed of SME experts from different countries; they ensure that the nominated experts represent a pan-European point of view by providing input and feedback to the expert. Participation in mirror committees is open to all experts supported by SME representative associations.

3. Should SMEs have a symbolic right to vote at European level?

Due to the existing rules on voting rights the influence of SMEs experts appointed by NORMAPME remains minimal as they do not have right to vote. Reforming the voting rules and allowing a single vote, though just symbolic, to the European organisation representing SMEs, is necessary to strengthen the representation of SMEs' interests. Such symbolic vote in the formal adoption of standards, which would not necessarily be counted in the voting result but would serve as an indicator of the level of support for a given standard among all stakeholders, would not hinder the functioning neither of the national delegation principle or the current weighted system.

The viewpoints of SMEs would be recorded and their voices better heard at European level.

⁴ NORMAPME currently follows 57 Technical Committees covering a very wide range of sectors. The SME experts nominated by NORMAPME in these committees have expressed the need for further promotion of SMEs' interests in their standardisation areas. Information about the SME experts of NORMAPME as well as about the process for selection of experts and Technical Committees is available at www.normapme.com

⁵ NORMAPME publishes the list of its SME experts on its website www.normapme.com.

Although the EC proposal for a “Standardisation package” defers the decision on voting rights to the review of 2013, no negative impacts were identified by the Commission regarding this issue (*SEC(2011) 671 - 3.2.3. Policy Option 2.B: Granting voting rights (...) would have a very positive impact on the involvement of SMEs (...). No negative impacts could be identified. However, this needs to be negotiated and agreed with the members of the ESOs.*)

4. Are SMEs sufficiently protected against anticompetitive behaviours in standardisation?

As it has been acknowledged by the European Commission standard-setting can, in specific circumstances, give rise to restrictive effects on competition⁶. These effects may be detrimental for SMEs.⁷

On the one hand, when an emerging technology developed by small enterprises is proposed for standardisation, European Standards Organisations should make sure that such new technology is not dismissed by incumbent companies - owners of traditional technologies - that dominate the standardisation processes.

On the other hand, undue preference is sometimes given by standards to special technological choices introduced by dominant market operators as a means to exclude other technologies from the market.

Even though the standard setting process is kept transparent and open to all competitors, anticompetitive behaviours can still be put in place by undertakings that have stronger means to control the processes. This situation may hinder SMEs as they have much less resources than the dominant market players.

In order to prevent such anticompetitive behaviours to occur, the regulatory framework should ensure openness and transparency of the standardisation process, as well as a balanced representation of stakeholders' categories.

5. Is the speed of standards development a critical issue?

Speeding up standards writing while maintaining the highest level of quality and stakeholder participation is in the interest of all actors involved in the standardisation process.

⁶ Guidelines on the applicability of Article 101 of the Treaty on the Functioning of the European Union to horizontal co-operation agreements (2011/C 11/01)

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2011:011:0001:0072:EN:PDF>

⁷ NORMAPME denounced examples of potential anticompetitive behaviors in the following standardization areas: CEN TC 89 “Thermal performance of buildings and building components / Multifoil insulation materials”, ISO TC 178 “Energy performance of lifts” and in CEN TC 10 “Lifts”, EOTA TC 213 on “building anchors”, CEN TC 133 “Copper and copper alloys / fittings”, CEN TC 33 “windows”. Detailed position is available at http://www.normapme.com/docs/positions/2010/NORMAPME%20position_Revised%20horizontal%20guidelines_Standardisation%20chapter_19072010.pdf

However, further speeding up the standardisation work should not be achieved at the expense of the core values of the standardisation system, such as inclusiveness and consensus nor at the expense of the quality of the content of the standard.

The success of a standard does not depend on time delivery but on its market uptake, which is mainly ensured by the quality of the standard and by the involvement of relevant stakeholders.

The Commission objective to reduce the average time to develop European standards by 50% by 2020, seems to be not realistic.

Moreover, EC funding cannot depend on the time of delivery of standards (as proposed in *Action 3 COM(2011)311*).

6. Are standards necessary for innovation and competitiveness?

Standards can serve the purposes of enhancing innovation and competitiveness under the conditions that (a) there is an actual uptake in the market, (b) they are of good quality . It cannot be expected that just because new standards exist for a certain sector, companies or market operators will become automatically more innovative and competitive. Similarly, standards as such cannot be seen as a channel to enforce policies defined by public authorities.

Only standards that have a real success on the market can serve as a vehicle for competitiveness and innovation. Therefore it is necessary to ensure a greater involvement of the market operators since the earlier development stage.

In addition, innovation and competitiveness can be sought if the highest quality of standards is ensured.

Finally, another important element is the time of standardisation: it is essential to ensure that standards are placed on the market at the right time when the new technology is mature enough and ready to be adopted by the market operators⁸ (see *Action 2 of COM(2011)311* : “*The Commission will demand that **European standards for innovative products and services** will be quickly elaborated and adopted , for example in the field of ecodesign, smart grids, energy efficiency of buildings, nanotechnologies, security and eMobility.*”).

7. Can participation of stakeholders be more balanced?

The principle of “**balanced representation**” should prevent those stakeholders that are massively present in a technical committee to achieve the absolute majority of votes ignoring the potential users of standards, such as SMEs, and other relevant stakeholders. Over-

⁸ As a way of example, EBC (The European Builders Confederation, the association representing 2M construction SMEs) opposes the application of Ecodesign standards to small scale and non serial production.

representation of one or a few stakeholders' categories should therefore be considered as grounds for questioning the validity of a standard.

Indeed, it is crucial to make a clear distinction among stakeholders that are users of standards, such as SMEs, and those whose business derives directly from standardisation activities, i.e consultants, certifiers, testing laboratories and also the standardisation bodies. Such a distinction would contribute to ensure that any possible conflicting interests in following and promoting standardisation work items is recognised and avoided whenever possible.

According to the above, the **transparency of affiliation** of members should be strictly enforced and monitored and other mechanism already present should be consistently applied, especially in cases where concerns are raised by stakeholders.

The enforcement of an **independent** and **fast-track appeal mechanism** for cases of over-representation of one or more categories of stakeholders would help to ensure the effective functioning of the "balanced representation principle". Consensus, defined as the absence of **sustained opposition** by any important part of the concerned interests, should be systematically pursued. In this way, the views of those who legitimately represent a collective stakeholder having a concerned interest would have the right to object to decisions that, despite meaningful discussion, continue to be unacceptable to that interest.

NORMAPME fully supports the EC proposal that the financing by the Union to the European Standardisation Organisations should be paid upon fulfilment of the condition that relevant stakeholders are appropriately represented (*see Art. 13.4 .b of COM(2011) 315*).

8. Why should standards always be relevant to the market?

The bottom-up approach should be the driving principle of the standardisation system. European Standards Organisations should aim at orientating standardisation to the market and to provide standards addressing the real needs of the relevant stakeholders, and in particular of micro, small and medium sized enterprises.

Market relevance of new standardisation projects should be assessed *a priori*: the request for new standards by stakeholders should be a pre-condition to start any new project.

Public authorities' intervention (e.g. top-down initiation of standardisation activities by the European Commission) is justified when pursuing societal interests like environment /consumer policies. However, such intervention can never be a substitute for market relevance that should always be the precondition to any new standard.

A sound methodology should be put in place to ensure that the relevant stakeholders in the EU and in the European Economic Area (EEA) are consulted when European Standards Organisations plan to develop a new standard.

In addition, before developing a new standardisation activity on products, services or on horizontal policies, an evaluation of its market relevance and of its possible impact on relevant stakeholders (including micro and small enterprises) should be carried out. This should be accompanied by a screening of already existing standards in order to avoid overlapping⁹.

⁹ Concerns of market relevance have been expressed, *inter alia*, by SME representatives in the following TCs: (a) ISO TC 228 on tourism services; (b) ISO TMB/WG SR - Social Responsibility; CEN/TC 217 - Surfaces for sports areas

For instance, the adaption of the CWA (CEN Workshop Agreement) Business Plan approach to European standardisation projects would provide the necessary clarity as to the purpose of the standard, detail the basis to be considered, give the justification/ need for the standard, outline method of working and detail the programme of work and timetable¹⁰.

9. What standards should the EC mandate?

It is desirable to avoid proliferation of unnecessary standards.

European mandates should request product/service specific standards rather than horizontal standards applicable to many products/services. Indeed, such horizontal standards often result in a set of generic requirements applicable to a wide range of different products and are very difficult to interpret and adopt by small businesses.

When mandates introduce new policy objectives, these should be pursued in the revision of existing standards rather than request the preparation of new standards.

Moreover, SMEs and other stakeholders should be put in the condition of monitoring closer the mandates drafted by the European Commission and ESOs' replies to those mandates. This would imply a longer consultation procedure on draft mandates.

Organisations representative of societal/economic stakeholders and SMEs should be permanently invited to the Committee of the Member States which will be in charge of assisting the Commission (current Committee 98/34). NORMAPME does not support Art 20 (2) of the proposed Regulation as it will have the effect to close the present Committee under article 5 of Directive 98/34 to all but the Member States.

10. Are European SMEs sufficiently represented in international standardisation?

The European Commission, the Member States and National Standards Organisations should promote the adoption of SME friendly policies in the international standards bodies, like ISO and IEC.

In particular, examples of SME friendly measures would be: the adoption of the CEN-CENELEC Guide 17 on SME needs at ISO and IEC, and the introduction of an effective system of monitoring stakeholders' participation in international technical committees. Moreover a permanent SME committee with advisory role should be created within ISO and IEC management bodies.

In addition, the EC should be more proactive in monitoring the application of the WTO TBT agreement within the works carried out by the international standards bodies. Indeed, the

¹⁰As a way of example, the use of a Business Plan approach in starting the work of CEN TC89 WG13 "Thermal performance of buildings and building components", would have given WG13 a much stronger basis for assessing the market relevance of relevant project standards.

proper application of such agreement should assure that the SME friendly provisions of EU legislation are not bypassed and dismissed at international level¹¹.

11. Are standards on services good for SMEs?

Service standards, as any product standard, should only follow a bottom-up approach. If not market driven, service standards would risk creating further burdens for SMEs¹². Services are already subject to numerous national regulations in the different Member States; hence, if new standards are introduced, they will probably produce further confusion and additional costs to companies without benefitting them.

In this respect the IMCO own-initiative report on the future of European Standardisation¹³ has already stated that service standards should always be related to the needs of the market.

NORMAPME welcomes the EC proposal to have marketdriven, consensus-based service standards (*see par 5 COM(2011) 311*). However, we recommend that the High Level Group on Business Services that the Commission will set up according to Action 18 of COM(2011)311, involves all relevant stakeholders, in particular SMEs.

12. What is special about ICT standards?

Interoperability and globally adopted standards are essential elements for the competitiveness of SMEs that provide products and services in the ICT market. Several specifications already exist and are widely applied by the market operators, even though they have not been developed with the standards organisations laid down in Directive 98/34. Therefore, ICT SMEs consider that fora and consortia specifications should be better recognised. Referencing of these specifications in legislation and public procurement should be possible.

However, an appropriate mechanism should exist in order to prevent possible misuse of such possibility. Specifications developed by non formal standardisation organisations should be subject to the same level of public scrutiny as formal standards. Compliance of Fora and Consortia specifications with the criteria of Annex II of the EC draft regulation should be reviewed by a **high level platform** (*see action 21, COM(2011)311*) inclusive of all relevant stakeholders, where SME representatives could play a role proportionate to their global weight in the market. The participation in such platform should be balanced and the

¹¹ A clear example can be found in the lifts sector, where ISO TC 178 in charge of developing a standard on the safety of lifts has tried to replace the SMEs friendly provisions of the European directives with a new standard not based on consensus.

¹² Concerns of market relevance have been expressed, *inter alia*, by SME representatives in the following TCs: (a) ISO TC 228 on tourism services; (b) ISO TMB/WG SR - Social Responsibility; CEN/TC 389 - Innovation Management.

¹³ IMCO REPORT on the future of European standardisation (2010/2051(INI))
<http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//NONSGML+REPORT+A7-2010-0276+0+DOC+PDF+V0//EN&language=EN>

governance should be assigned to economic/societal stakeholders rather than to standards setting organisations¹⁴.

Furthermore, the use of specifications developed by Fora and Consortia can be accepted in public procurement, but not accepted as a means to demonstrate compliance with legislation.

The treatment of intellectual property rights (IPRs) within standards is a complex subject that deserves a thorough analysis. On one hand, royalties rewarding companies' investment in research have proven to be a successful incentive to innovation. On the other hand, it should be acknowledged that some sectors subject to a high degree of standardisation (e.g. software industry) have experienced a high pace of innovation even where those incentives were not present. In these cases other business models have better rewarded the innovative companies, and also ensured a widespread use of the innovative solutions. It should also be noticed that an excessive focus on rewarding licence owners, especially large IPR holders, may have negative effects on SMEs, when they are new entrants in a market or just standards users.

A wide debate should be opened on the issue of IPR policy in standards setting organisations. In particular, we are convinced that FRAND¹⁵, while being the most appropriate approach in many cases, should not become the only mandatory option. A wider choice of policies, including for instance Royalty Free terms, should be considered on a case by case basis depending on the standardisation scenario and on the sector concerned.

Another important matter that should be discussed as regards the IPR policy in standardisation is the "ex ante disclosure" of IPRs. Standards setting organisations should be able to enforce mandatory disclosure of the existence of patents and other IPRs by all parties involved in a standardisation project before the latter begins.

Besides, joint ex- ante royalty negotiations or discussions should be allowed within the standardisation process as they could mitigate the market power of essential IPR holders conferred by a standard.

13. Is the price of standards appropriate to SMEs?

In many cases, although the price of a standard is not very high, the use of cross references may dramatically increase the cost. In order to purchase the set of standards necessary to manufacture a specific product, manufacturers in certain countries spend several hundreds Euros. Therefore, NSBs should have special rates for SMEs and sell bundles of standards at a reduced price.

This principle has been fully endorsed by the EC proposal for a "Standardisation package" (*par 4, action 14 COM(2011) 311*).

¹⁴ This is supported by SME experts in Technical Committees on ICT at CEN, ETSI and ISO levels, respectively CEN TC 251 e-health, ISO TC 215 e-health, CEN Workshop E-Invoicing, CEN Workshop ICT-SKILLS, CEN/TC 353 - Information and Communication Technologies for Learning Education and Training, ETSI / TC Intelligent Transport Services, ETSI User Group

¹⁵ Fair, reasonable, and non-discriminatory terms (FRAND)

14. How to develop more SME friendly standards?

The recommendations and self assessment provided within CEN/CENELEC Guide 17 on SME needs are a good way for standard writers to deliver standards fit for SMEs.

Elements such as size of the enterprise, serial characteristic of the production, complexity of the process, sector, etc should always be taken into account when drafting a new standard.

First it should be clear for an SME whether or not a standard is applicable to its product. This can be solved by publishing **free of charge** good quality **scopes and abstracts**.

Some standards are too difficult to be understood and implemented by small enterprises. In this case **simplification manuals** should be produced by European Standards Organisations (ESOs).¹⁶

Often standards are too expensive to be implemented by small enterprises. In this case standards drafters should consider the **reduction of cost of implementation** as a criterion in the setting of standards. For example unnecessary costs can be avoided by minimising the obligation to undertake test methods and allow compliance to be demonstrated via available calculation methods.

¹⁶ These recommendations are in line with the report on SME access to standardisation, commissioned by CEN and CENELEC. In addition, the activities related to the access facilitation of SMEs to standards should be undertaken in co-operation with SMEs associations, considering that, as demonstrated in a 2003 EC study, SMEs, especially micro enterprises, mainly contact their business association rather than their NSB for standardisation issues.

About NORMAPME

NORMAPME is an international non-profit association created in 1996 with the support of the European Commission, under the full name of the "European Office of Crafts, Trades and Small and Medium sized Enterprises for Standardisation".

NORMAPME is exclusively devoted to the interests of Crafts and Small and Medium sized Enterprises in the European standardisation system, and represents over 12 million SMEs in all European countries, including all European Union and European Free Trade Association (EFTA) member states. Membership is open to all SME organisations and other organisations that promote SME interests.

NORMAPME members

Horizontal members: UEAPME - Union Européenne de l'Artisanat et des Petites et Moyennes Entreprises, JEUNE - Jeunes Entrepreneurs de l'Union Européenne, ESBA - European Small Business Alliance, FIDEM - Fundació Internacional de la Dona Emprenedora

Sectoral members: *Construction:* EBC - European Builders Confederation, ECAP - European Consortium of Anchors Produces, EMM - European Multifoil Manufacturers, SFIRMM - Syndicat des Fabricants d'Isolants Réflecteurs Minces Multicouches, *Machinery* - EMU - European Metal Union, *Roofing:* IFD - International Federation for the Roofing Trade, *Doors and windows:* EUROWINDOOR, *Textile:* CINET - Comité International de l'Entretien du Textile, *Healthcare - Medical:* FEPPD - Fédération Européenne et Internationale des Patrons Prothésistes Dentaires, ZVOS - Zentralverband Orthopädieschuhtechnik, *Timber:* EVH - Europäische Vereinigung des Holzbaus, FNS - Fédération Nationale des Scieries, *Heating, Ventilation and Air Conditioning:* GCI-UICP - Génie Climatique International - Union internationale de la plomberie et de la couverture, *Transport:* BIPAVER - Bureau International Permanent des Associés de Vendeurs et Réchappeurs de pneumatiques, ETRA - European Two-wheel Retailers' Association, *ICT:* PIN-SME - Pan-European ICT and E-Business Network for SME, *Lifts:* EFESME - European Federation for Elevator Small and Medium-sized Enterprises, ELCA - European Lift Components Association, *Tourism:* FPP - Fédération des Professionnels de la Piscine

UEAPME members

Also all UEAPME members are consulted by NORMAPME. UEAPME incorporates 80 member organisations consisting of national cross-sectoral SME federations and European branch federations:

National members: Austria - WKÖ, Belgium - CNBPME, UNIZO, UCM, Bulgaria - National Chamber of Crafts of Bulgaria, UPEE, Cyprus - CCCI, Czech Republic - AMSP, Hospodárská komora, Denmark - Håndværksrådet, Estonia - EVEA, Finland - SY, France - APCMA, UPA, CGPME, Germany - ZDH, Greece - G.S.E.V.E.E., Hungary - IPOSZ, KISOSZ, OKISZ, Ireland - ISME, SFA, Italy - CONFARTIGIANATO, CONFAPI, CNA, CONFESERCENTI, Latvia - LAK, Lithuania - LVDK, Luxembourg - Chambre des Métiers du Grand Duché de Luxembourg, Fédération des Artisans, Malta - GRTU, Netherlands - MKB/VNO, Poland - ZRP, Portugal - AIP, Romania - CNIPMMR, Slovenia - OZS, Spain - CEPYME, CEAT, PIMEB, PIMEC, Sweden - Företagarna, Croatia - HOK, HUP, Liechtenstein - Wirtschaftskammer Liechtenstein, Serbia - SASME, Turkey - TESK

European sectoral members: *Construction-* ESCHFÖ, FIDEN, EBC, CEETB, UNIEP, EUF, EuroWindow, VEUKO, *Machinery* - EMU, *Roofing* - IFD, *Lifts* - EFESME, *Timber* - European Construction Wood Federation, *Heating, Ventilation and Air Conditioning* - GCI-UICP, *Food* - CEBP, *Healthcare* - FEPPD, INTERBOR, CEPEC, Coiffure EU, *Services* - EFAA, Children's Fashion Europe, ECSLA, BIPAR, *ICT* - PIN-SME, *Transport* - ETRA, ECF, A.I.R.C., UETR

Other associate members: Balkan - Mittelstandsbüro Balkan, Europe - JEUNE, FEM, France - BPCE, Germany - SIGNAL, Italy - Artigiancassa, United Kingdom - ACCA

Other consulted industry associations

AIE, BUSINESSEUROPE, CECIMO, CEIBOIS, CEPMC, CLECAT, DIGITALEUROPE, ETRA, EUROCHAMBRES, EUROCOMMERCE, EURATEX, FIEC, HOTREC, EURALARM, ORGALIME, UEA, UETR.

ORGALIME and EURALARM responded that they do not support most of the points of the position of NORMAPME (they only agree on paragraphs 8, 11, 13).

BUSINESSEUROPE was consulted but decided not to respond officially.

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