



POSITION PAPER

Recommendations to boost SMEs' role in international standardisation

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Key points

- **Strengthen the role of SMEs in international standardisation, both at policy and technical level.** Measures such as **establishing a SME policy group within ISO-IEC** would provide a necessary forum to discuss standardisation issues affecting SMEs. On the technical side, it is vital to **streamline the cumbersome liaison request process for SME associations**, which is a primary way in which SMEs representatives and experts can directly impact the work of ISO and IEC Technical Committees (TCs) and Subcommittees (SCs). Another vital measure would be to **allow conditional access to relevant normative references** to SMEs and societal stakeholders' representatives.
- Strengthen the **participation of SMEs in international standardisation** by boosting their role and importance at the national level, **leveraging the national delegation principle**. To achieve this, SBS leads a dedicated workstream under the High-Level Forum on European standardisation to **identify best practices and recommendations to improve access and participation** of SMEs and societal stakeholders in national standardisation.
- **Stronger support from political and standardisation decision-makers to SME participation.** SBS supports the use of existing fora with like-minded trade partners around the world to push the inclusiveness agenda at the international level. **The European Standardisation Organisations (ESOs) should also strengthen the current cooperation agreements with their international counterparts from an inclusiveness point of view.** A stronger support can also be given by the ESOs and the National Standardisation Bodies (NSBs) **when SME representatives submit liaison requests to ISO and IEC Technical Committees and Subcommittees.**
- **Leverage the role of national and European SME associations as multipliers**, both in terms supporting the dissemination of knowledge about standards among SMEs and by acting as hubs for contributions and involvement of SMEs in standardisation. **Training and capacity building programmes aimed at SME associations**, backed by the necessary financial and organisation resources, would be extremely valuable.

- **Stronger awareness and dissemination of existing tools.** For instance, [ISO-IEC Guide 17 for writing standards taking into account the needs of SMEs](#) should be further promoted, particularly among TC Secretariats and WG Convenors, and be the subject of specific trainings and sessions. SBS has also developed the [SBS SME Compatibility Test](#), based on Guide 17, aimed at evaluating the SME-friendliness of any standardisation deliverable, either published or still under discussion.
 - **Help SMEs navigate standards and the standardisation process,** by avoiding an **excessive proliferation of standards** and by establishing **monitoring tools** to keep track and individuate relevant standardisation activity and deliverables.
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Strengthen the participation of SMEs in international standardisation decision-making

One of the main avenues to ensure the effective participation and impact of SMEs in international standardisation is to **strengthen their role and prerogatives in the decision-making process of ISO and IEC.**

On the policy side, SBS believes that **a crucial measure to be implemented should be establishing a SME policy group within ISO-IEC (similar to the one that was created by the WTO)**, which would provide a necessary forum to improve awareness and responsiveness to SME needs. Such a setup would help launching initiatives to promote the active role of SMEs in international standardisation and allow them to convey their views and proposals in a formal, recognised setting. Similar initiatives exist in Europe both at national level (DIN-KOMMIT; AFNOR...) and within the European Standardisation Organisations (CEN-CENELEC SME Working Group).

In ISO and IEC, there are already existing examples of fora established to boost the participation of specific stakeholders categories, such as “[DEVCO](#) – Committee to support developing countries”, and “[COPOLCO](#) – Committee on Consumer Policy”, to raise awareness of standardisation among consumers and improve participation. **Creating a similar setup, grouping SME representatives and standards bodies, would be extremely valuable and relatively easy to implement, since similar structures are already in place.**

SBS believes that including SME representatives with an **observer status to the meetings of the ISO and IEC Technical Management Boards** could be an opportunity to get direct insights into the unique challenges, needs and perspectives of SMEs. Such a measure is already in place at European level, and this can lead to the development of standards that are more relevant and applicable to a broader range of businesses, not just large corporations.

Strengthen the role and impact of SME experts in international standardisation

In terms of strengthening the role and impact of SMEs and SME-nominated experts in work at ISO and IEC level, a number of different actions can be pursued.

A first necessary step is to **further promote and streamline the access of SME experts to ISO and IEC Technical Committees (TCs) and Subcommittees (SCs)**. Proportionally, SMEs rely on associations much more than larger companies to represent their interests in standardisation, and this phenomenon is even more accentuated when dealing with international standardisation. Therefore, one of the main avenues for SME experts to access international standardisation work is via their nomination as experts by SME associations such as SBS.

At the moment, organisations like SBS have to set up a separate liaison agreement with each ISO/IEC TC and SC that they wish to participate in, a process that **can take months to go through**. This can **gravely delay, and at times prevent altogether, the possibility for SME experts to bring into the discussion the European SME perspective** and to contribute to key phases of the development of a standard. Furthermore, the liaison request process is not in any way centralised, and it is delegated by the ISO and IEC Central Secretariats to each TC and SC, with a vote on the request of the members of each corresponding technical body. **This leads to large inconsistencies as to how each individual liaison request is managed.**

SBS's recommendation in this sense would be to **grant to representatives from recognised SME automatic access ISO and IEC Technical Committees and Subcommittees**. At a minimum, **Annex III organisations should be granted automatic access to standardisation work carried out in ISO and IEC aimed at supporting European legislation**, given their role of public interest enshrined in Regulation 1025/2012 on European standardisation.

A final point in this area concerns so-called **"normative references"**. Standards often reference other standards or deliverables that have to be bought in order to comply with the standard under consideration. As it is easy to understand, this creates a barrier to the implementation of standards that **disproportionally damages SMEs experts and SME standards users**. To address this at European level, an agreement was recently reached between **CEN and CENELEC and Annex III organisations, to grant conditional access to watermarked versions of standardisation deliverables cited as normative references**, in full respect of copyright norms. There is every reason to believe that **a similar procedure can be established in cooperation with ISO-IEC**. Granting conditional access to normative references to SME and societal representatives, so that they can effectively participate in standardisation work, is **clearly feasible and does not impact the business model of the SDOs**.

3

Leverage the national delegation principle to boost SMEs' impact and role

The representation of different countries in ISO and IEC hinges on the so-called "national delegation principle". Under this model, each National Standardisation Body is responsible for developing a consensus national position in a so-called "national mirror committee", and vote accordingly in the corresponding ISO or IEC technical body. A crucial way to strengthen the role of SMEs at international level is therefore to **boost their participation and importance in national standardisation, leveraging the national delegation principle** so that SMEs have a greater say in the consensus position developed in each country.

To achieve this goal, **SBS leads a dedicated workstream under the High-Level Forum on European**

standardisation (HLF) to enhance the inclusiveness of national standardisation across Europe. The workstream brings together SMEs and representatives from societal stakeholders, industry, the ESOs and several EU Member States to **map existing gaps and best practices and provide recommendations to strengthen the access and participation of all relevant stakeholders in national standardisation**. The main deliverable of the workstream, a set of recommendations to be endorsed by the HLF is expected for the second half of 2024.

Support to SMEs participation from national and European decision-makers

A stronger and more effective participation of European SMEs and societal stakeholders in international standardisation also goes through a **stronger political and technical support from national and European decision-makers involved in standardisation**.

On the political side, **SBS supports the use of existing fora with like-minded trade partners** around the world to push the inclusiveness agenda at the international level. A positive example of this, are the recent developments in the EU-US Trade and Technology Council (TTC) and the discussions within its Working Group 1 on Technology Standards around the **need to build shared support towards greater inclusiveness to rebalance the influence and interests in international standardisation**.

On the technical side, the ESOs should also consider whether the current cooperation agreements with their international counterparts **could be strengthened from an inclusiveness point of view and support recommendations to strengthen the role and impact from SME and societal stakeholders' experts and representatives**, such as the ones outlined in this document.

It is also of particular importance that the participation of European SME and civil society representatives within ISO and IEC technical bodies is **fully supported by the different European National Standardisation Bodies**. Very often, in fact, European NSBs either **do not vote or abstain** on the internal ballots **on the liaison requests submitted by the Annex III organisations** within relevant ISO and IEC Technical Committees and Subcommittees.

SME associations as multipliers for awareness and participation

The involvement of individual SMEs is often very limited in national and European standardisation, and this phenomenon is obviously even more exacerbated at the international level. To ensure a proper and balanced representation of SMEs at all levels of standardisation, it is therefore **crucial to strengthen the roles and prerogatives of SME associations, to act as "bridges" and multipliers** for involvement and participation of SMEs.

SMEs rely on sectoral and category associations [proportionally much more than larger companies](#) to represent their interests in standardisation. In this sense, it would be **extremely valuable to establish training, awareness-raising and capacity-building campaigns aimed at SME associations**, to be supported by the **necessary financial and organisational resources** from national and European institutions. This would support SME associations and

their staff in being more **aware of the benefits of standardisation for SMEs**, disseminating relevant information throughout their networks and **helping both the implementation of standards by SMEs and recruiting technical experts** to participate in standardisation work.

Stronger awareness and dissemination of existing tools

Next to establishing and enhancing rights and prerogatives, there is a **need for a stronger awareness and dissemination of existing practical tools** to support the participation and impact of SMEs in international standardisation. For instance, [ISO-IEC Guide 17 for writing standards taking into account the needs of SMEs](#) should be further promoted, particularly among TC Secretariats and WG Convenors, and be the subject of specific trainings and sessions. SBS has also developed the [SBS SME Compatibility Test](#), based on Guide 17, aimed at evaluating the SME-friendliness of any standardisation deliverable, either published or still under discussion, via a wide range of criteria covering all areas of each standardisation deliverable.

Help SMEs navigate standards and the standardisation process

The number of standards developed each year is constantly increasing. **This puts SMEs at a disadvantage when deciding which standards to access or implement**, and it can contribute to a perception of standardisation as too complex or time consuming, **turning SMEs and potential experts away from getting involved in standardisation**.

From the point of view of SMEs, it is therefore **extremely important to avoid an excessive proliferation of standards**. When new standardisation topics emerge, there is a tendency to immediately create or request a new standard. Sometimes there are gaps and new standards are needed, but **whenever possible the first step should be towards adapting and/or amending existing standards, rather than automatically creating new ones**. When discussing the launch of new standardisation work there is also a need to improve the dissemination and availability of information on proposals for the creation of new fields of activity, as it can be particularly difficult for SMEs, particularly those not already closely involved in standardisation, to find the relevant information.

On a related note, **it can be extremely challenging for SMEs to have an overview of all relevant existing standards**. Therefore, it is also extremely important to **improve monitoring of standardisation developments** and access to information for SMEs. How can SMEs access info on standards and how can they figure out what standard they need to be involved in and use? Being able to identify the standards that are particularly relevant for SMEs is a prerequisite to be able to represent the interest of SMEs and to be further involved in standardisation.

SBS has built [a publicly accessible monitoring system](#) of standardisation developments on a wide range of SME priority topics, individuated via [a study commissioned by SBS at the end of 2021](#). There are existing projects at

the national level, (e.g., the one established by DIN in Germany), to develop tools to **facilitate the monitoring of standardisation developments** relevant to SMEs in a sector. SBS strongly encourages and supports the creation of a centralised online monitoring tool to allow SMEs to keep track of relevant standardisation developments carried out by different SDOs at all levels (national, European, international). The creation and deployment of such a tool at ISO-IEC level, covering all standardisation deliverables both published and under discussion **would be of invaluable importance to SMEs.**

Small Business Standards (SBS) is the European association representing and supporting small and medium-sized companies (SMEs) in the standardisation process, both at European and international levels.

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