



## SBS reply to Call for Evidence on the Single Market Programme interim evaluation

December 2023

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SBS welcomes the opportunity to provide feedback to this call for evidence for the interim evaluation of the Single Market Programme (SMP) and looks forward to further contributing to the upcoming stages of the evaluation process.

The SMP has proved to be an indispensable tool to support the participation of all stakeholders in the European standardisation system, particularly with regards to the role and participation of the so-called “Annex III organisations” (SBS, ANEC, ECOS, ETUC) representing European SMEs and societal stakeholders in European and international standardisation.

In this sense, it is critical to continue supporting and promoting the participation on SMEs in standardisation, and proceed with a full and thorough implementation of the provisions of Regulation 1025/2012 on European standardisation, particularly Articles 5 and 6 of the Regulation regarding stakeholder participation in European standardisation and access of SMEs to standards, as recently [reiterated by SBS in their joint reply with SMEUnited and EBC \(European Builders’ Confederation\) to the call for evidence on the evaluation of Regulation 1025/2012](#).

SBS positively notes the increased strategic and political focus put by the European Commission on standardisation in the last few years, highlighted by the Standardisation Strategy published in February 2022 and the creation of the High-Level Forum on European standardisation, in which SBS is an active member. So far, this focus has been accompanied by a generally adequate budget and funding. It is of paramount importance, however, that this trend of financial support for the European standardisation system is at the very least maintained, if not further strengthened. The stated ambition of the European Commission to reinforce the role of Europe as a global standards-setter and the current evaluation of Regulation 1025, in fact, have to be backed by robust and consistent funding of all areas of the European standardisation system, with a particular focus on the inclusiveness and participation of SMEs and other underrepresented stakeholders.

The primary area on which further emphasis should be put, in terms of both financial and non-financial support, is promoting and ensuring stronger representation of SMEs’ interests in standardisation at all levels (national, European, international).

On the operational aspects, there are a couple of points that SBS would like to highlight, as beneficiary of a grant under the SMP. Firstly, SBS believes that longer grants (for instance 2 years instead of 1 year) would be very beneficial in terms of reducing the administrative resources to be dedicated to reporting obligations. Secondly, the use of unit costs for the reimbursement of travel should be reconsidered. In fact, this forces grant recipients to create a dual system, given that in local accounts, actual costs must be recorded. This leads to negative consequences in terms of administrative burden and working hours to be dedicated. SBS therefore recommends the use of actual travel costs for the SMP grants.

**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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