



POSITION PAPER

Recommendations for further SME involvement in standardisation at the national level

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Background

The National Standards Bodies (NSBs) are the main channel for the participation of stakeholders in the development of European and international standards. According to the “*national delegation principle*”, each NSB sends a delegation of experts to European or International Technical Committees to represent the national standpoint agreed at the relevant national “*Mirror Committee*” composed of the national stakeholders. These national delegations are the ones holding the voting rights. Even in the case of ETSI, which is based on direct membership, and following the recent amendment to Regulation 1025/2012, decisions related to the acceptance of Standardisation requests, related work items, European standards and other deliverables should be made exclusively by representatives of the National Standards Bodies. Establishing contacts and increasing the effective participation of SMEs and SME associations at the national level is therefore essential to increase inclusiveness and their participation in the development of European and international standards.

In 2022, SBS carried out a [questionnaire among SME associations](#) to have better insight into their knowledge about standardisation and their relationship with the NSBs. The questionnaire looked into the involvement of SMEs in the work of the NSBs as well as the support offered to SMEs by the National Standard Bodies and the national governments to get further involved in standardisation. 117 organisations and 29 SMEs replied to the questionnaire.

This paper outlines a series of recommendations derived from the findings of the survey and feedback received through SBS members and its network that could help to increase SME involvement in standardisation at the national level. This paper also aims to contribute to the discussions within the High-Level Forum about the inclusiveness of SMEs and other stakeholders in standardisation at the national level.

NSBs need to be more proactive and reach out to SME associations

SMEs and SME associations are often not aware of the importance of standards. General awareness campaigns may therefore have a limited effect and must be complemented by proactively contacting SME associations. Due to their limited time and resources, SMEs tend to rely more than large companies on their SME association to get information and to represent their interests. This highlights the critical role of these associations in bridging the gap between SMEs and standardisation processes. The results of the SBS survey revealed some SME associations are unaware of the National Standards Body(ies) in their country. Moreover, a significant number of SMEs and their associations, even those familiar with their NSB(s) are not involved in Technical Committees due to a lack of understanding of how to get involved.

NSBs should initiate targeted outreach programmes and proactively engage and seek partnerships with SME associations. This could be done by organising regular meetings, informative sessions and joint seminars focusing on those topics of interest to SMEs at the national level, the relevance of standards and how they impact SMEs. Some of these activities should be integrated into already existing fairs, exhibitions or conferences where SMEs are likely to be present whenever possible. They should be tailored to demonstrate the practical value of standards in improving business operations, competitiveness, and market access for SMEs. SBS and its members could support the NSBs in establishing these contacts at the national level, if needed.

NSBs need to provide easily accessible information allowing SMEs to identify relevant standardisation work

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In 2023 there were more than 400 active Technical Committees in CEN, CENELEC and ETSI and in 2022 more than 1,600 documents were published by CEN and CENELEC alone. This number increases considerably if we also consider the Technical Committees and documents being developed at the national and international levels. One of the main challenges for SMEs is to identify those work items and initiatives that are relevant to them. There is a lot of information available online (new work items, work items under Enquiry, under Formal vote, etc.). However this information is normally not centralised in a single point and is not being structured in an easy way that would help SMEs to search and identify those work items and new proposals of relevance to them. The identification of relevant ongoing work is a pre-condition to the effective participation of SMEs and other stakeholders.

Some NSBs (e.g. DIN) have developed and are currently working on monitoring systems allowing to look for relevant work items and initiatives based on keywords. SBS has also developed a [monitoring system](#) to help SMEs and SME associations to get this information in a more structured way. NSBs should consider developing such tools at the national level or putting resources together to work on a project at a wider scale (e.g. at the European level) that could help to develop such monitoring tools.

Furthermore, National Standards Bodies must adopt a more structured and proactive strategy in engaging national stakeholders regarding the initiation of new fields of work and the establishment of new Technical Committees or Working Groups. Typically, consultations are confined to the existing network of stakeholders within the NSB, or at best, they are announced on the standards body's website. A more proactive approach is necessary, one that includes identifying and actively researching and reaching out to potential key stakeholders

throughout the supply chain that could be affected by the standard. This should particularly involve small and medium-sized enterprises (SMEs), as their insights and needs are often underrepresented. Engaging with relevant SME associations can provide a more comprehensive and diverse range of perspectives, ensuring that the standards developed are inclusive and reflective of the broader industry landscape.

The level to which a proactive approach is followed often depends on the specific person from the NSB who is responsible for the specific new activity. A common and structured approach is therefore necessary to ensure that the relevant SME organisations at the right level of the supply chain are contacted and informed about new standardisation work.

Create and further promote SME support services within NSBs

The implementation and effective communication of dedicated SME support services by National Standards Bodies (NSBs) are crucial. While many NSBs already offer some form of support, such as specialised SME web pages or contact points, the findings of the SBS survey indicate a significant lack of awareness among SMEs and their associations about these available resources.

NSBs should develop targeted communication campaigns to increase awareness of SME support services. This could involve partnerships with SME associations to disseminate information more effectively. These support services should offer personalised guidance to cater to the unique needs of different SMEs. This could include one-on-one consultations, tailored advice on navigating the standards landscape, and assistance in understanding how specific standards apply to their business. Services to support the implementation of standards and to provide answers related to their implementation should also be available.

It is also recommended to establish a feedback loop with SMEs and SME associations who use these services. This would help NSBs to continuously improve their offerings and ensure they are meeting the needs of SMEs effectively.

NSBs need to ensure favourable entry conditions for SMEs and their effective participation in standardisation work

While NSBs operate under different financing models, they share a common responsibility to foster inclusivity in the standards development process. Ensuring that all pertinent national stakeholders, regardless of their financial capacity, can participate is crucial. To this end, access to national (mirror) committees must be either free of charge or offered at special rates tailored to the financial capabilities of SMEs and SME associations. This approach not only promotes broader participation but also ensures that the standards developed are reflective of a diverse range of perspectives and needs.

Furthermore, ensuring that SMEs and SME associations not only gain access to various Technical Committees but can effectively participate is crucial. This would involve the provision of training programmes for new SME experts to enhance their understanding of the standardisation process, adopting hybrid meeting options to reduce travel time, further developing the capacity to contribute to the development of standards online and ensuring access to relevant documents and resources. Regarding this last point, access to the text of normative

references has been one of the difficulties repeatedly expressed by experts concerning their effective participation in technical work. Normative references are references to other standards that are needed for the implementation of the specific standard being developed or revised. Access to the text of these standards needs to be ensured to stakeholders participating in national mirror committees and those interested in contributing to standardisation by submitting comments on draft standards during Enquiry.

NSBs must ensure an effective Enquiry process at the national level

The enquiry process in the development of standards is crucial as it aims at ensuring broad stakeholder involvement, enhancing the quality, relevance, and consensus of the standard. The SBS survey revealed that although many NSBs have online portals to promote a broad consultation of national stakeholders during the enquiry, these portals are not widely known and, in some cases, even not fully up to date. It is often not obvious to find them by entering into the standards body website. Most of the time comments are not actively during the enquiry process and it is limited to making available the draft text in these online portals.

Moreover, what happens with the comments received during the enquiry by stakeholders outside the national mirror committees is not clear. There is not a transparent procedure that would allow stakeholders to defend their comments or to have them incorporated into the national position.

NSBs need to have a more proactive approach regarding enquiry and to establish channels for SMEs to provide input and feedback effectively. This could be done by establishing a channel with the relevant SME associations, proactively informing them and asking for their feedback on standards under enquiry that could be relevant for them. There is also a need to make the existing online portals prominent and visible on the NSB website, promote them and establish transparent mechanisms on how to deal with the comments submitted during enquiry so that they can help to shape the national position.

Ensure the balanced representation of stakeholders in National (Mirror) Committees

Achieving balanced representation within the National (Mirror) Committees is crucial to upholding the inclusiveness of the standard development process. A well-rounded representation ensures that no singular interest group dominates the standardisation process and that a real consensus among different actors is reached, safeguarding against the undue influence of any specific stakeholder to the detriment of other less usually represented stakeholders such as SMEs or societal stakeholders. This balance is vital in capturing a diverse array of perspectives, particularly those of underrepresented actors such as SMEs, consumer organizations, environmental NGOs, and trade unions. These stakeholders often face barriers like limited awareness and constrained strategic resources, including financial constraints, time limitations, and a shortage of skills and knowledge necessary for effective participation in the standardization process.

It is therefore important that National Standards Bodies actively monitor the representation of the different stakeholders in Technical Committees and that they proactively seek to contact and involve those relevant stakeholders that may be missing. Moreover, NSBs should put in place mechanisms to ensure that decisions taken in national committees are balanced and appropriately consider the interests and views of the different

categories of stakeholders.

NSBs should train their staff about the role and rights of Annex III organisations and promote existing tools to consider SMEs when developing standards

Secretaries, Chairs and members of Technical Committees (TCs) and Working Groups (WGs) appointed by NSBs often lack awareness of the rights of Annex III organisations (ANEC, ECOS, ETUC and SBS) and their crucial role in representing specific stakeholder interests in standardisation. This oversight can lead to the undervaluing of contributions from SME experts appointed by SBS. National Standards Bodies must therefore enhance training and raise awareness among their staff, national delegations and TC chairs about the rights and significance of the work of Annex III representatives.

Finally, there is a need to further promote the use of existing tools such as the [CEN-CENELEC Guide 17](#) 'Guidance for writing standards taking into account micro, small and medium-sized enterprises (SMEs) needs' or the [SME Compatibility Test for standards](#) developed by SBS to ensure SME needs are considered when developing standards.

Involve SMEs in the NSB governing structures and/or create specific Advisory Bodies

The involvement of SMEs in the governing bodies of National Standards Bodies (NSBs) varies significantly from country to country and depends on the specific policies and structures of each NSB. In many countries, NSBs recognize the importance of SME participation in standardization processes and have made efforts to include them in various capacities, including governance roles. Some NSBs have dedicated seats for SME representatives on their governing boards or committees, ensuring direct input from the SME community. Other NSBs have established advisory committees or working groups where SMEs can provide input on strategic decisions and discuss standardisation related issues. Specific Committees exist for example in DIN (KOMMIT) or in AFNOR. Those NSBs that do not have in place similar structures could consider establishing those.

A joint CEN-CENELEC SME Working Group also exists at the European level. The aim of this group is to serve as a forum for the exchange of information, national experiences and best practices to further support and encourage the participation of SMEs in the European Standardization System. This group should be strengthened by organising more regular meetings and workshops for sharing experiences, best practices and case studies and developing practical recommendations and SME engagement strategies.

Build the capacity of SME associations to get involved and participate in standardisation and integrate standardisation in education curricula

National SME associations are key in spreading knowledge about standards among SMEs, yet they often face a shortage of staff qualified in standardisation. To address this, it's crucial to develop targeted training and capacity-building programs for these associations, enhancing their ability to represent SME interests effectively in standardization. Such programs could be collaboratively designed by various NSBs, with support from their respective Member States. SBS is ready to assist in these initiatives. Additionally, establishing mentorship programs, where experienced SME standardisation experts guide newcomers, in collaboration with National

Standards Organizations and SME associations, can further boost knowledge and strengthen SME representation in standardization at all levels.

There is also a need for Member States to integrate standardisation aspects in existing curricula not only for universities but also in vocational training and life-long learning. This would ensure that both upcoming and current professionals are equipped with essential knowledge of standardization, vital in today's globalized economy. Including standardisation in vocational and continuous education programs would help current workers stay updated with evolving industry standards, fostering a workforce that is adaptable to evolving industry standards.

Financial support for the participation of SMEs and SME associations should also be provided at the national level

An important obstacle to the participation of SMEs in standardisation is the availability of resources. At the European level, the EU and EFTA are providing financial support through SBS for the participation and representation of SMEs in European and International standardisation. This financial support must be complemented with financial support for the participation of SMEs and SME associations at the national level. This additional financial backing would enable SMEs and their associations to engage more actively in national standardisation activities and as a result increase their involvement in the development of European and International standards.

Some funding and support schemes, including tax rebates already exist at the national level. To be effective, these national support schemes must be designed with the needs and constraints of SMEs in mind. They should be straightforward and accessible, minimising bureaucratic hurdles that can often deter SMEs and SME associations with limited time and resources. This means simplifying application processes, offering clear guidelines, and ensuring that the support is readily available.

Furthermore, these support schemes should not only facilitate SME participation in standard development but also aid in implementing these standards within SMEs. While some countries offer support for implementing specific standards, these may not always align with the needs of individual SMEs. Hence, flexibility in the supported standards is crucial. Assistance should include practical implementation guidance, staff training, and financial aid to offset the costs of adopting new standards.

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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