



COMMISSION DES COMMUNAUTÉS EUROPÉENNES

Bruxelles, le 18.6.2008
SEC(2008) 2103

AVIS DU COMITÉ DES ÉVALUATIONS D'IMPACT

COMMUNICATION DE LA COMMISSION AU PARLEMENT EUROPÉEN, AU
CONSEIL, AU COMITÉ ÉCONOMIQUE ET SOCIAL EUROPÉEN ET AU COMITÉ DES
RÉGIONS

UN "SMALL BUSINESS ACT" POUR L'EUROPE

{COM(2008) 394}

{SEC(2008) 2101}

{SEC(2008) 2102}



EUROPEAN COMMISSION
IMPACT ASSESSMENT BOARD

Brussels, ~~05~~ 06 2008
D(2008) 4532

Opinion

Title **Impact Assessment on: Communication on a 'Small Business Act for Europe' (draft – revised - version of 24 May 2008)**

Lead DG **DG ENTR**

1) Impact Assessment Board Opinion

(A) Context

The Impact Assessment accompanies the Commission's proposal for a 'Small Business Act' for Europe. In their October 2007 meeting the Heads of State and Government have agreed to fully unlock the growth and jobs potential of SMEs as part of the Lisbon strategy. In March 2008 the European Council expressed its strong support for the adoption of a Small Business Act. The proposed approach will include a number of already existing policies (to be found in Annex III of the Impact Assessment, where existing EU policies and actions at National level are further explained and listed).

(B) Positive aspects

The revised report is more consistent and balanced and provides a good overview of the current situation of SMEs in the EU economy.

(C) Main recommendations for improvements

The recommendations below are listed in order of descending importance. Some more technical comments have been transmitted directly to the author DG and are expected to be incorporated in the final version of the impact assessment report, subject to the discussions that took place in the meeting with the Board.

General recommendation: The IA report still needs to improve the problem description to give a clearer picture of how the situation of SMEs would evolve in the absence of a new policy approach, and consequently, to explain clearly the value added that will be produced by this new approach. The arguments in favour of particular new policy instruments or the choice of Community level or Member State level action should be based on more solid evidence and economic analysis.

(1) Make a further effort to improve the outline of expected developments under the baseline scenario. The report still needs to provide a better description of the expected developments in the SME sector under the baseline scenario that presupposes unchanged continuation of existing policies. It should better address the influence of exogenous developments (technological change, external market trends and their influence on

Commission européenne, B-1049 Bruxelles / Europese Commissie, B-1049 Brussel - Belgium. Telephone: (32-2) 299 11 11. Office: BERL 6/29. Telephone: direct line (32-2) 2981898. Fax: (32-2) 2965960.

E-mail: impact-assessment-board@ec.europa.eu

demand and supply), and should specifically indicate to what extent the problems relate to firm size (micro, small and medium). Comparisons with developments in the SME sector in other industrial economies, and the effects of policies implemented in those countries, could be useful. This analysis should make clear why a new policy approach is necessary and how this will address the problems that have been identified earlier in the report.

(2) Strengthen the links between the objectives of the proposed policies and the actual initiatives that will be proposed. Give greater emphasis to the positive opportunities for SMEs, especially under the "environmental" objective. Given that the SBA contains a detailed list of proposals for policy action, the IA should evaluate the value-added compared to the baseline of these proposals under the different options. The report states explicitly that it does not "scrutinise every specific option to tackle each specific problem" as a result of the wide scope of the initiative. The link between the objectives listed in the report and the actions which are proposed therefore still needs to be clarified. It could be strengthened by a more explicit presentation of arguments explaining why certain actions will or will not be proposed in the context of the Small Business Act. For example, the revised report is more balanced in its analysis of the "environmental" objective of SBA (*"turn the environmental challenge into opportunities for SMEs"*) but still gives very little attention to the fact that a considerable part of eco-innovation is already initiated and implemented by SMEs. The report should therefore be clearer on why additional actions are needed to take this objective forward, and what those actions should be.

(3) Provide more analysis and evidence to give an indication of the magnitude of the impacts of new policies. The sections on economic, social and environmental impact should provide the arguments to show that new policies can indeed make a substantial difference. Available evaluation information concerning existing policies, or studies into the effectiveness of specific policy instruments should be used to give a more precise indication of the effectiveness of the proposed actions. The section on monitoring and evaluation should briefly indicate what currently unavailable data would be required for the IAs of the various specific proposals contained in the SBA.

(D) Procedure and presentation

It appears that all procedural requirements have been complied with.

2) IAB scrutiny process

Reference number	2008/ENTR/036 (priority initiative)
Author DG	ENTR
External expertise used	No
Date of Board Meeting	Written procedure
Date of adoption of Opinion	4 15 -06- 2008