

Pan-European ICT and eBusiness Network for SMEs – PIN-SME – AISBL
Identification number in the register of interest representatives: 66552321207-56

1. Do you think that service standards (including process standards) and alternative standardisation documents should be included in the scope of Directive 98/34/EC or its successor?

PIN-SME considers that the inclusion into the scope of directive 98/34/EC of service standards and alternative standardisation documents is not wishful.

Service standards cannot be directly compared to other products. Services are often executed for one person from another. As a result national specificities relating to cultural or educational differences, as well as structural differences regarding social security, health and other entities must be reflected in service standards. Services are not as easily exported as other products. National specificities must be considered to protect the people. European SMEs therefore would not support a full harmonisation of services standards in the same form as it is the case with product standards.

Besides any new European initiatives related to service standards must be only market driven and caution should be taken to avoid the tendency of consultants and certifiers to promote increased use of standards and certification to support their own businesses.

2. Are you aware of specific cases where national service standards and alternative standardisation documents have caused technical barriers to trade?

No direct trade barriers due to national service standards are known to us. If such difficulties exist they are likely founded on the need for protecting consumers within EU member states.

Alternative standardisation documents developed by Fora/Consortia are not elaborated in a consensus-based transparent process and often represent the opinion of specific stakeholders. These documents have no legitimisation through the participation of all relevant stakeholders and the respect of general standardisation principles. Therefore they should not be included in the scope of Directive 98/34/EC. Alternative standardisation documents are often elaborated with the aim of providing a specific competitive advantage for one or more parties. Therefore they can sometimes conflict with another parties' alternative standardisation document, which may mean that Barriers directly result from such documents.

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3. For areas other than Information and Communication Technology (ICT), should it be possible to refer to documents developed by fora and consortia in legislation and public policies? If it should, how should it be implemented?

Not all fora/consortia work on the basis of WTO guidelines of openness, transparency and balanced representation. Some consortia are dominated by non-European representatives. In addition, a large number of competing fora or consortia would increase the difficulty for effective representation for SMEs and other stakeholders. A lack of transparency and credibility may also lead to legal uncertainties for the companies. SMEs therefore reject the use of documents developed in fora or consortia without sufficient legitimisation through balanced stakeholder input.

Such documents may only be used as the basis for standardisation if they have been developed in an open and balanced process and should be submitted to public consultation via European Standardisation Organisations. The ESO propose suitable fast track adoption procedures. Nevertheless, care must be taken that such fast track procedures do not become a "back door" for developing standards without the full involvement of stakeholders.

4. How could ESOs and NSOs be encouraged to accelerate their standards development process? Should for example the Community financing for standardisation be subject to conditions in terms of speed of delivery whilst maintaining the openness of the process?

Speeding up standards writing while maintaining the highest level of quality and stakeholder participation is in the interest of all actors and stakeholders involved in the process and implementation. If the EC financial support can be result oriented, delays in the process are often linked to problems faced by stakeholders.

Further speeding up the standardisation work may not be achieved at the expense of the quality of the work undertaken in standardisation committees, nor at the expense of the quality of the content of the standard. In particular the accuracy of standards as well as avoiding excessive complexity and contradictions must be an absolute priority, especially in regards to legal certainty for the user.

In addition revision intervals should not be shortened, as each modification entails bureaucracy and implementation costs (training, adapting processes and/or machinery) in companies, in addition to the purchase price of the new standard). The need for accelerating the process is mainly crucial when it concerns the revision of existing standards which are often adopted in order to include amendments and improvements. It happens frequently that the revision stage lasts a long time which does not help in the application of the standards by the companies.

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Speeding-up of standard writing should therefore focus on management and bureaucracy minimisation, continually improving templates and support systems. In addition, IT communication systems for commenting, sharing and voting should be supported.

6. Should the WTO principles of transparency, openness, impartiality, consensus, efficiency, relevance and consistency be integrated in the legal framework of European standardisation (especially in EU Directive 98/34/EC or in its successor)? How should this be implemented?

The WTO principles of transparency, openness, impartiality, consensus, efficiency, relevance and consistency must be integrated in the legal framework of European standardisation (especially in EU Directive 98/34/EC or in its successor). As the ESOs, CEN and CENELEC national members already comply with these principles; therefore there can be no practical objection against introducing these principles into Directive 98/34. The WTO principles are fundamental guarantees and should form part of directive 98/34

In addition, the balanced representation should be added to these principles. The application of these principles should be one of the conditions for being declared as ESOs.

In addition the revision of the EU Directive should be considered as an opportunity to implement the Small Business Act and incorporate the “Think Small First” principles (e.g. consultation of SME representative organisation, impact assessment).

ESOs shall review their internal rules of procedures to be able to guarantee the implementation of these principles. It should also be required from NSOs and ESO to implement the CEN CLC Guide on SMEs.

7. How could the participation of consumer organisations, environmental NGOs, trade unions and social partners, and SMEs be best promoted? What should be the role of public authorities (European Commission and Member States) in supporting such a participation in a transparent, open, impartial, consensual, efficient, relevant and consistent European standardisation system?

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The participation of craftsmen in working groups and technical tables is certainly one of the fields of activities where SMEs and crafts have still to work. Indeed SMEs could give their support and share their technical knowledge only if some main obstacles are overcome, such as time, travels and participation fees.

Promoting the participation of SMEs in standardisation bodies is an important task as it is putting the basis for a critical revision of the relationship between industry and technical standards. As a matter of fact standardisation is becoming a valuable input for innovation and competitiveness. SMEs should actively participate in the standardisation process, starting from the access to information to the involvement in the setting of strategies aiming at the protection of national specificities within the European technical field.

The following elements are to be considered to promote the participation of SMEs:

- *Financial support*
- *Voting rights in Technical Committees, Technical Boards and in bodies dealing with appeals.*
- *Balanced representation – Meaning of over 25% participation by any type of stakeholders would be ground by formal appeal by the other interested stakeholders. ESO and NSOs shall identify possible stakeholders and contact them when the creation of a new work item or new technical body is considered and ensure the real representation of all stakeholders.*
- *Better communication between National Standard Bodies (NSO), European Standardisation Organisations, SMEs/ national-European SMEs associations*
- *On line consultation on draft standards at all stages of the development*
- *Free access for SMEs to National mirror Technical Committees*
- *Pro active behaviour of NSOs to increase the participation of SMEs/ National SMEs associations in National mirror Technical Committees*
- *Awareness raising and information: Through information materials, but also training and qualification of company managers, intermediaries and sector representatives the knowledge about standardisation (especially European standardisation) and available forms of participation can be improved. Such work must be part of all NSOs tasks.*
- *Guaranteeing participation of SMEs: In order to improve standards and acceptance, all relevant interested parties and future users must be identified and invited to contribute to the standardisation work. Direct and indirect participation costs must be considered in accordance with the company size. The EU definition of SMEs can be a useful guide.*
- *Appointing an SME Envoy and establishing an SME Helpdesk: In all NSO and ESO an SME-Envoy should be appointed (e.g.in Germany the KOMMIT (Kommission Mittelstand) has this role helping with SME representation in standardisation and better access to standards.)*

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- *Support (including financially) to train in standardisation staff members of SME representative organisations. These people will have: 1) To inform SMEs on new works 2) Identify experts that could take part in National mirror committees and European Technical Bodies 3) to advise on ways for them to comply with the relevant standards.*

National and European public authorities should promote and enforce these provisions.

7. How could the NSOs (National Standards Organisations) deepen their cooperation, and mutualise their activities? Could the following tasks be shared amongst several NSOs?

- 1. Management of the Secretariats of Technical Committees?**
- 2. Notification of new national standardisation projects?**
- 3. Promotion/sales of standards?**
- 4. Other?**

The European Commission should not attempt to centralise activities but could support the implementation of some provisions that could facilitate a real pan European participation of all types of stakeholders.

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- *Twinning for European TC secretariats should be foreseen – an “old” EU member State NSO with a new one*
- *Organisation of clusters to implement National mirror Technical Committees (e.g. Baltic countries)*

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- *Training of staff members and experts*

8. Without prejudice to the national delegation principle, how could the European Standards Organisations (ESOs) manage directly, on a case by case basis, some standardisation activities, especially some Technical Committees?

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PIN-SME believes that:

- No action should be taken that would undermine the national delegation principle.
- Standardisation should be market driven

9. What support should the European Commission provide to facilitate the use of European standards as a means to open global markets? What would be the operational means that the Commission should use? (Support experts' participation in international standardisation activities, translation of European standards into extra-community languages?)

Political support from the European Commission for the promotion of European Standards outside the EU is welcome. Greater use and knowledge of European Standards would support European companies with export activities.

Support of EN at ISO level should be organised.

The European Commission should support the participation of SMEs and their representatives in ISO TCs

The Commission should also translate key European standards in foreign languages (such as Chinese, Indian) and adjust the priorities of EU representation abroad to increase support for European Standards.

10. Under which conditions do you think that the European Commission could launch, on a case by case basis, calls for tenders, open to the ESOs and to other organisations, to develop standards supporting EU policies and legislation?

By principle PIN-SME is not in favour of engaging other bodies as it may lead to a fragmentation of the standardisation activity. The end result of competing standardisation institutes at European level could lead to overlapping work, difficulties in regard to stakeholder influence, transparency and even contradictory standards.

Nevertheless on an very exceptional basis, this could be used provided it is not in the scope of one of the three ESOs, the WTO principles and the balanced representation principles are respected.

11. What is, in your view, the most efficient level of participation in the process of standards development: national, European, international?

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Participation in the standardisation process should be organised as close to the stakeholders as possible. The input must therefore - whenever possible - be made at national level in the Mirror committees. Nevertheless the possibility for adjusting at European level for a given misrepresentation of a stakeholder group, such as SMEs is positive. Even if SMEs tend to participate more easily at National level, it does not mean that their views are well forwarded at European/International levels if they do not participate directly or via their representative organisations.

The most efficient level of participation in the process of standards development is the level at which decisions are made.

12. In your opinion, where is the major added value in European standardisation with respect to national standardisation?

Market facilitation and interoperability

European Standards make it easier for companies including SME to deal with products from other countries and export their own products. Trade barriers are removed and legal certainty, as well as access to information is facilitated. The credo should be: one standard, one test, Europe-wide acceptance.

Nevertheless, what is often an advantage for products, is not necessarily transposable in the same way for services

European standardisation allows knowledge sharing between European enterprises.

13. What are, in your view, the most serious barriers to the use of standards by enterprises: costs of standards (purchasing price)? Costs of operational implementation? Access to information? Knowledge of existing standards?

In every sector there are more or less pronounced differences regarding the relevance, number, and contents of standards. For that reason SMEs in different sectors experience varying degrees of difficulty based on different causes. It is therefore difficult to reply to this general question for all companies in a precise manner.

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Cost of implementation: Each new standard creates a need for information and training. Processes must be modified and employees must adapt to the change. In certain cases equipment and tools must also be adapted. The cost of implementing new standards is therefore very significant.

Inadaptability of the contents: In order to promote the use of standards in SMEs it is essential to tackle the problem of language in standards. At all cost it must be avoided to use unnecessary jargon and language that makes it difficult for those who have to apply it (especially in SMEs) to do so. Effective yet simple language reduces implementing costs of new standards and avoids problems due to misinterpretation. Real balanced representation should be one of the ways to obtain SME friendlier standards. The production of implementation manual adapted to SME needs should be accelerated and promoted.

Cost of standards: Nevertheless, the purchasing cost of standards is relevant. Depending on the sector a single SME may have to apply 20-300 different standards. On average a standard cost around 50 € (for EhN around 120€), which means that for a given company the price of buying standards the first time can be in excess of 10.000 €. It is therefore essential that any potential for reducing the cost of standards is examined in detail, including using IT solutions, cost effective standardisation work including project management, etc. Yet, the fundamental principle of user participation in standard development costs through the sale of standards should be maintained. It is normal that those who benefit from standardisation should finance it. Standards used to comply with CE marking requirements should be free of charge.

NSOs are free to set the sale price for their standards. Below is an example of the on-line sale price for EN 14351-1

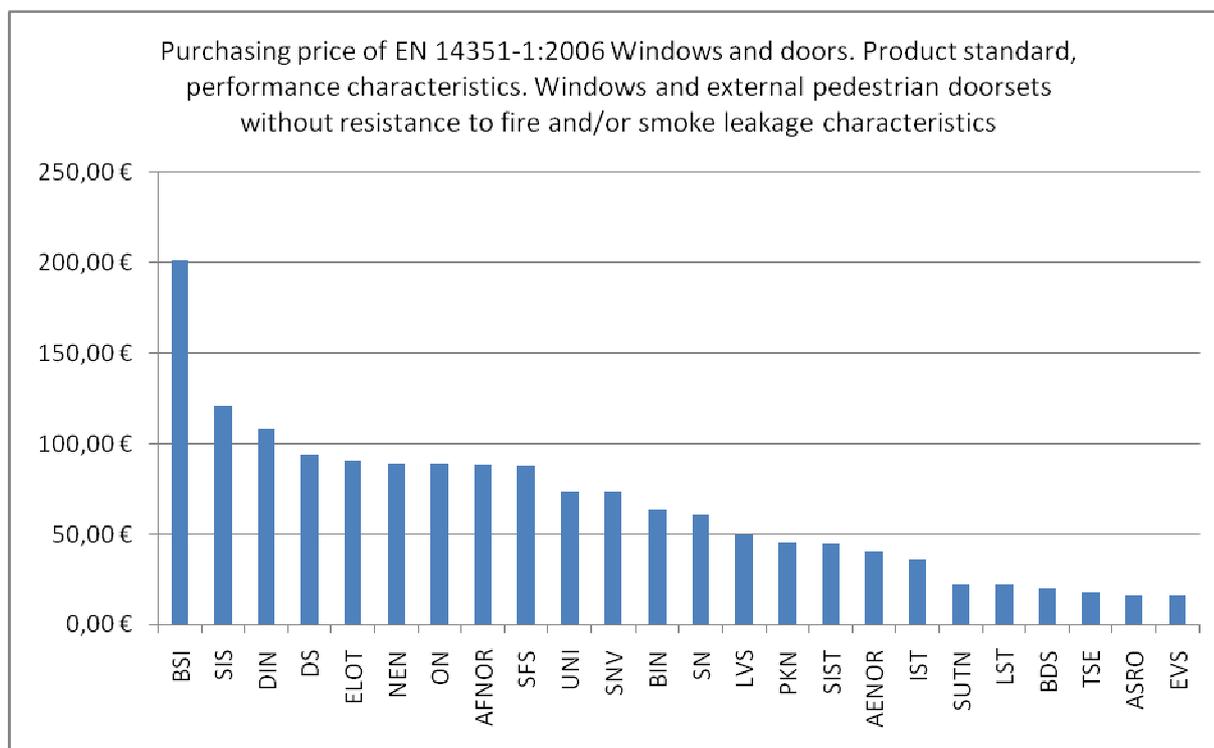
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Note: on-line pricing was not available or required registration/login by CYS, HZN, UNMZ, MSZT, NSAI, ILNAS, MSA and IPQ

A British enterprise wish to purchase the complete set of standards listed in the normative references of EN 14351-1, it should set aside 6.361, 15€.

Reducing Certification: Radically reducing the cost of standards bears the risk, that standardisation organisation further develop other financing sources and activities to maintain their revenues. One such source generating important revenues is certification. We are at risk of further exposing enterprises to a market driven certification obligation, motivated only by financial interests of the certifiers. Extensive use of certification schemes reduces the credibility of the main stream standardisation and simply leads to shifting or even increasing costs for enterprises rather than reducing them.

Costs of participating in CEN Standardisation process: European Standardisation is more expensive for SMEs in terms of direct and indirect costs (time/lost working hours, including before and after the meetings, travel costs et.), which explains the known lack in SME participation. Professional Associations try to close the gap at national and European level by financially sponsoring SMEs for their participation or sending their own employees to standardisation committees. Such work results in substantial costs for the associations.

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Costs of creating the necessary data sets (i.e. for CWFT - classified without further testing – procedures): The creation of the data sets necessary to engage in concrete and detailed standardisation widely exceeds the cost of purchasing standards. CWFT procedures are user-friendly for SMEs because they allow the use of recognised national databases. If in future such work is to be shifted more to the European level the cost of creating and filling the necessary databases must be considered.

Access to information: SMEs often lack the knowledge about the potential of using standards, where to obtain them, what new initiatives are being developed, how to influence standardisation, about the validity and emission date of a standard, and how to use them properly. SME representative organisation should have the possibility to consult on line standards for free and numerous systems have been made available to check the validity of a standard. In addition, on-line commenting functions for draft standards could allow SMEs to provide input cost effectively. Awareness-raising, information and training of SMEs in regards to standardisation should be provided. NSOs should work together with SME representatives to develop suitable and adapted offers. SMEs and their representative organisations should be informed beforehand on new work items and the creation of a new technical body.

14. What could the standards organisations do, in addition to their current practice, to facilitate the access to standards, especially by SMEs?

- *Information on standards, processes and New Work Items.*
 - *SME representative organisations should have the possibility to consult for free standards.*
 - *Increasing the number of places where standards can be publically consulted for free.*
 - *Providing full information about the modification of standards: Standards are revised regularly. Sometimes the changes are significant, sometimes less so or only for part of the document. An SME cannot continuously update its standards library. It is necessary to devise systems to effectively communicate the changes in order for the SME to make an informed decision about buying the latest updated version of the standard.*
- *Financial support to participation for SMEs and their representative bodies.*
- *New pricing models: New pricing and licensing models for SMEs should also be considered to make using standards easier, more cost effective (i.e., multi-PC user licenses, etc.) and easier to budget for (flat rates, micropayment, etc.). Specific sector solutions should also be considered to adapt to the varying needs of SMEs.*
- *Making use of the SME definition: The size and type of company will influence whether participation in the standardisation system or simply using standards is conceivable. The*

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European definition of micro, small and medium companies can be a useful guide and should be taken note of when solutions are considered.

- *Free information on new released standards in each European language.*
- *Free information from the preliminary phase*
- *Training on standardisation for SMEs and their representative bodies.*
- *Cooperation with SME representative organisations*
- *Increased participation of SMEs in TC would lead to standards less expensive to implement*
- *Pro active actions towards balance representation*
- *Implementation of the SME guide*
- *Cheaper standards package for SMEs*
- *Smart standards*
- *Implementation of the recommendations listed in the CEN CENELEC SME Access study*
- *Training activities, as one of the most interesting fields. In order to create new services or to make more effective those already existing, strong training initiatives would be required on at least the following three levels:*

1. *Basic training;*
2. *Advanced training aiming at updating existing knowledge and improving the effectiveness of the actions;*
3. *Specific training aiming at expanding business areas, offering new services, adopting new normative provisions or implementing new certification fields.*

This kind of activity implies the involvement of the national standardisation body.

- *Production of implementation manuals and/or handbooks.*
- *Organisation and setting up of contacts points within local SMEs' associations. This would be one of the most direct ways to make technical standards more familiar to SMEs. Information material, guides and handbooks could then be circulated through these contact points.*

About PIN-SME

PIN-SME, *the PanEuropean ICT and eBusiness Network for SMEs*, is the first European association of the ICT sector exclusively focused of representing the interests of SMEs. PIN-SME members are ten national sectorial SME associations from different EU countries. PIN-SME represents more than **50.000 enterprises**, which employ around 200.000 people across Europe. PIN-SME is a registered interest representative (ID: 66552321207-56) in the EU.

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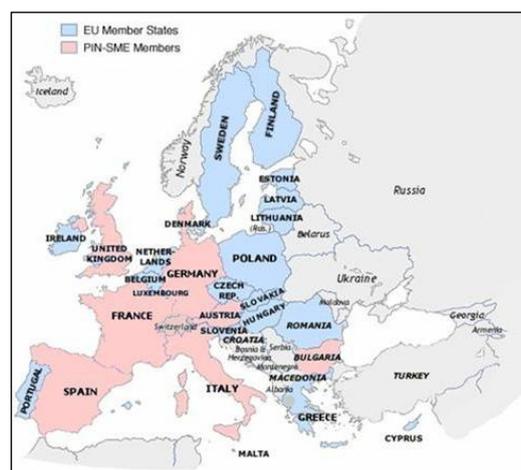


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