

## UEAPME<sup>1</sup> additional suggestions for the draft “SME Action Programme” of the German Federal Ministry for Economic Affairs and Energy.

### Access to finance:

To be added:

- Banking regulation: adequate regulation for small local banks, in order to increase the capacity of those banks to lend to SMEs.

### Smart regulation

As mentioned during the meeting UEAPME welcomes the use of the term “smart regulation” as it is a much richer concept than “better regulation”. As such it implicates the use of innovative regulatory approaches (your 4th bullet point).

We would also like to see a reference to the fact that regulation has to be “future proof” (important especially due to the digitalisation of the economy), but real smart regulation is also future proof.

To be added:

- Application of the real “think small first” principle (= making regulations with the smallest enterprises in mind)
- Consequent application of the “only once” principle by administrations at all levels.

### Access to markets

- Support for Internationalisation both inside as outside the EU

### Entrepreneurship:

To be added:

- Sharing economy
- Self-employment

---

<sup>1</sup> UEAPME subscribes to the European Commission’s Register of Interest Representatives and to the related code of conduct as requested by the European Transparency Initiative. Our ID number is [55820581197-35](#).

As mentioned during the meeting, “Social entrepreneurship” and “social responsibility” are two completely different issues.

## Skills and training

To be added:

- Basic skills
- Work-based learning & apprenticeship

As I explained this is extremely important for SMEs and also a conditio sine qua non for the integration of refugees

## Digitisation and Innovation

To be added:

- Support measures for SMEs to deal with digitalisation

Brussels, 16<sup>th</sup> February 2015

**For further information on this paper, please contact:**

Luc Hendrickx  
Director Enterprise Policy and External Relations  
Email: [l.hendrickx@ueapme.com](mailto:l.hendrickx@ueapme.com)

