



UNION EUROPEENNE DE L'ARTISANAT ET DES PETITES ET MOYENNES ENTREPRISES
EUROPÄISCHE UNION DES HANDWERKS UND DER KLEIN- UND MITTELBETRIEBE
EUROPEAN ASSOCIATION OF CRAFT, SMALL AND MEDIUM-SIZED ENTERPRISES
UNIONE EUROPEA DELL' ARTIGIANATO E DELLE PICCOLE E MEDIE IMPRESE

UEAPME preliminary Position Paper on the Draft Impact Assessment Guidelines

On 2nd June 2008 the European Commission launched a stakeholder consultation on their revised draft Commission Impact Assessment Guidelines.

UEAPME highly welcomes the initiative of the Commission to constantly improve the guidelines since Impact Assessments are indispensable and essential in the better lawmaking process.

For many years now, UEAPME is advocating for **systematic, specific, real and independent impact assessments¹ for SMEs**, taking into account their different categories, for every new legislative proposal and including amendments made by the Council or the European Parliament. The impact assessments (cost-benefits) must be published together with the consultation document and should be an entire part of it².

UEAPME fully appreciates the continuous efforts of the Commission to improve its consultation process. Its call for feedback and to continue the discussion on general principles and minimum standards for consultation shows the Commission's will to reinforce the culture of consultation and dialogue.

Nevertheless, as the consultation period closes on 25th July (after even less than 8 weeks) we are confronted with the fact that **once again the Commission does not respect the General principles and minimum standards for consultation of interested parties it set.**^{3 4}

Indeed the General principles, to which reference is made in the consultation web-page, clearly state that "On the other hand, a consultation period longer than eight weeks might be required in order to take account of:

- the need for European or national organisations to consult their members in order to produce a consolidated viewpoint
- ...

¹ See UEAPMEs position paper "General reflexions on business impact analysis" dd. February 2002.

² See UEAPMEs position paper "UEAPME expectations on the proposal for a European Small Business Act" December 2007

³ UEAPMEs Position Paper on the Green Paper "European Transparency Initiative" COM (2006) 194 final

⁴ UEAPME Position Paper on the Consultation document: "Towards a reinforced culture of consultation and dialogue - Proposal for general principles and minimum standards for consultation of interested parties by the Commission." COM(2002)277final

- main holiday periods.”

Therefore UEAPME will take the liberty to send its comments on the consultation during the month of September.

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