

Dear Commissioner Verheugen,

I would like to thank the Commission for this early involvement of stakeholders regarding the proposed Small Business Act initiative (SBA). The Danish government would like to take this opportunity to come forward with initial ideas and priorities for the SBA.

The Small Business Act should focus on improving the framework conditions, rather than creating specific regulatory schemes and exemptions from general EU legislation, i.e. state aid rules, which risk distorting competition and well-functioning markets for certain sectors or business types.

In the Single Market Review published in November 2007, the Commission stressed that new initiatives must be impact driven and result-oriented. To ensure a sustainable and integrated SME initiative these principles should be evoked in relation to the SBA. The challenges as well as the strengths of the European SMEs should be monitored to ensure targeted initiatives.

Furthermore, the Single Market Review highlighted the benefits of applying mixed policy tools and introduced an increased focus on non-legislative tools. This policy approach is suited for the SME initiative, as it is flexible and would ensure that the Commission and the Member states further commit to the "Think Small First approach" without creating a situation where the development of the general European enterprise policy is locked by regulation specifically aimed at SMEs.

We find that the Small Business Act should include a review of existing initiatives aimed at SMEs.

I enclose a paper which points out our initial thoughts on specific initiatives and measures for the Small Business Act. This does not form an exhaustive list, but further ideas could be evolved by Denmark, as the work with the Commission initiative develops.

Following are the list of 14 Danish proposals for Small Business Act initiatives:

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- Use of and further development of new digital solutions for reporting, registration and publication (e.g. XBRL).
- Increased use of existing information accessible in administrative registers.
- Optimized random controls.
- Fixed dates for implementing.
- Introduction of “burden chasers”.
- Introduction of project regarding “irritation burdens”.
- A consideration on the raising of the threshold amounts for which the Public Procurement Directive applies, and an obligation for the member states to establish national publication platforms for contracts not or not fully subject to the provisions of the Public Procurement Directive.
- Introduction of a Code of Conduct outlining guidelines to help public authorities to define relevant and proportionate requirements.
- Setting up an electronic marketplace for IPR, where it is possible to trade knowledge and IPR.
- Introduction of a patent insurance which covers patent owner’s costs for enforcement of their patent rights against patent infringers. Patent insurance is offered by private companies and it is voluntary for the patent owners, if they want to buy such insurance. On a European level, an insurance initiative could be extended to cover all types of IPR.
- Introduction of a European CSR Compass.
- Information campaigns on standardisation.
- Introduction of a homepage aimed at helping SMEs implement the new European construction norms.
- Introduction of an evaluation of existing information and communication platforms towards SME, nationally and at EU level.

We will be more than happy to elaborate on the ideas mentioned, and provide a more in-depth explanation of the mentioned Danish models if the Commission should desire us to do so.

Yours sincerely



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