

Mr. Stéphane Séjourné  
Executive Vice-President for Prosperity and Industrial Strategy  
European Commission  
Rue de la Loi 200  
1049 Brussels  
Belgium

Brussels, 21 March 2025

Subject: **EU SME Envoy**

Dear Executive Vice President Séjourné,

I was concerned to learn that the European Commission has formally discontinued the process of recruiting an EU SME Envoy. How the European Commission organises itself is of course your own 'cuisine interne'. Nonetheless, you will understand that Eurochambres is extremely disappointed by this decision and that we consequently seek certain reassurances on behalf of the chamber network and its 20 million business members, the huge majority of which are SMEs.

Given that they represent 99% of all businesses, SMEs should be the norm, not the exception when EU policy-makers are considering, drafting and discussing new proposals. Legislation should therefore systematically be drafted with their considerations to the fore. In reality though, this is often not the case, and the unintended consequences of decisions on SMEs are frequently overlooked by the European Commission and indeed the co-legislators.

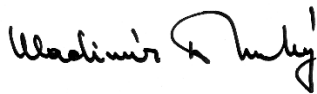
For various reasons, there was no EU SME Envoy throughout the previous legislative term, despite President von der Leyen's 2019 commitment to appoint one. From chambers' perspective, this absence was glaring. It would be delusional to think that an EU SME Envoy would have prevented all of the regulatory burdens from the last term that the new Commission is now rightly seeking to address, but it is clear that SMEs were not foremost in the Commission's thinking between 2019 and 2024. While we fully support the ongoing efforts to simplify some of the legislation adopted in the recent past, prevention would be better than cure, and it is therefore essential to Europe's competitiveness and reindustrialisation that additional new regulatory burdens on SMEs are avoided. It is in this respect that the role of the EU SME Envoy seems so pertinent.

As you know, Eurochambres works closely with DG GROW to analyse the effectiveness of SME testing during the impact assessment process. There has been incremental progress over the years, as our most recent SME Test Benchmark report with BusinessEurope and SMEunited underlined. We also take note of the current development of SME checks as part of the impact assessment. Notwithstanding this, there remains considerable room for improvement. We are conscious that inattentive practices persist across Commission services during the consultation process. Political pressure too often leads to basic elements of the better regulation guidelines being overlooked, and the EU SME Envoy would play a key part in ensuring that SMEs are not the ones bearing the consequences of this.

With this in mind, we maintain that a high level, fully dedicated internal Commission advocate for SMEs, with outreach across the services and in close contact with you and President von der Leyen, would add significant weight to the process of embedding a 'think small first' approach. The EU SME Envoy could also act as a valuable additional interlocutor for stakeholders and with co-legislators to ensure that the implications and unintended consequences for SMEs are carefully considered throughout the decision making process.

I hope that these concerns are taken into account and that – with or without an EU SME Envoy - this European Commission will ensure that the needs of the 99% of businesses are carefully and consistently factored into the policy making process throughout its term.

Yours sincerely,



Vladimír Dlouhý

cc: Valdis Dombrovskis, European Commissioner for Economy and Productivity;  
Implementation and Simplification