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## **REPORT ON THE PUBLIC CONSULTATION ON THE EU MARKET ACCESS STRATEGY**

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## **Explanatory note**

This report has been prepared by the services of DG External Trade in the European Commission.

It attempts to summarise the responses to the consultation in a fair but readable way: it tries to get across all points of view, but precisely because it is a summary document, it cannot claim to be totally exhaustive.

It should not be taken to represent the views of the European Commission on any one of the viewpoints presented: in particular, it does not seek to endorse (or criticise) any of the comments which have been made in response to the consultation process.

## EXECUTIVE SUMMARY

There has been a strong response to the European Commission's consultation on the Market Access Strategy.

In particular, there is strong support for the Market Access Strategy overall, but plenty of calls for what amounts to a *renewed partnership* between the European Commission, Member States and EU business, with more focus 'on the ground' in third countries. Respondents request the review of the EU Market Access Strategy to lead to a more assertive, effective and dynamic approach to tackle trade and investment barriers in international markets.

Nearly all the contributors favour new approaches in the work of the Commission with Member States. Respondents suggest that coordination and exchange of information could be improved by establishing some sort of "trade barriers network" involving the Commission and the Commission Delegations, Member States and their embassies and business associations, such as Chambers of Commerce.

There is a call for stronger consultations on specific market access issues between the Commission and the Member States, together with more involvement of business. Suggestions include reinforcing the Market Access Advisory Committee (MAAC), involving business more in the 133 Committee and establishing local trade committees in third countries.

There is an equally strong agreement in favour of new arrangements to improve the information flow between business and the Commission. Contributors indicate that the exchange of information could be improved, inter alia, by more promotion of market access activities, more information on relevant contacts within the Commission, the establishment of a "one-stop-shop" for market access in the Commission with sufficient resources to perform its role in the Market Access Strategy, the publishing of trade barriers reports for key markets, more information on how business should give input as well as better procedures for feedback from the Commission, and the establishment of an "early-warning system" on up-coming third country laws and FTAs.

Active participation of EU business is requested in terms of their participation in meetings with third countries in Brussels and abroad, more direct involvement in trade negotiations, the establishment of trade barrier advisory committees with business representatives and again, more regular discussion between business, the Commission and Member States.

Most of the respondents call for attention to the specific needs of Small and Medium sized Enterprises (SMEs). It is suggested that the exchange of information between SMEs and the Commission could be improved by measures such as a communication campaign for making the Market Access Strategy better known, making the assistance on the ground more effective, the idea of a trade help desk for SMEs in the Commission and better cooperation between networks which are in contact with SMEs. Respondents also express a desire for SME associations to be better represented in fora where market access issues are discussed. Some of the respondents

from SME associations and the Chambers of Commerce would be willing to participate in a think tank dedicated to market access issues for SMEs.

Contributors also mention the need to allocate enough resources to allow the Commission to carry out its functions, in relation to the implementation of the Market Access Strategy.

Contributions favour prioritisation as an essential aspect of the new Market Access Strategy, given the increasing number of trade barriers, the difficulties to solve them and the availability of resources. Prioritisation should be based on transparent economic criteria (for example, the issues of economic potential, blatant violations of international commitments, market access issue of vital interests, existence of leverage in negotiations were all mentioned) and in open dialogue with business and Member States.

From a geographical perspective, the priorities suggested by respondents are the main EU trading partners and the emerging countries (China, India, Brazil, Russia, among them), and to a lesser extent the EU's neighbouring countries.

In terms of issues, respondents suggest that the key barriers to prioritise are non tariff barriers, particularly regulatory issues and intellectual property questions, those barriers causing the greatest trade distortion and those with the greatest likelihood of being removed within a realistic timeframe.

Given the ever increasing complexity of current barriers and the urgency which a number of respondents refer to, bilateral agreements are considered by the majority of respondents as the most suitable instrument to improve market access prospects for EU business, while at the same time acknowledging the importance of the current WTO negotiations at multilateral level. Respondents believe that negotiations of bilateral agreements with key trading partners and emerging countries should cover non tariff barriers not protected by WTO agreements: regulatory cooperation, access to raw materials and public procurement are the most frequently mentioned.

In order to ensure that EU trade partners meet their obligations and to defend EU interests, bilateral agreements should include dispute resolution mechanisms. Respondents also agree that the Trade Barriers Regulation should be reinforced to allow it to cover violations beyond WTO rules. The simplification of the information requirements of the Trade Barriers Regulation, as requested by most respondents, would enable Small and Medium Enterprises to use this instrument.

Anticipation and prevention of non tariff barriers is perceived as a very important element of the new Market Access Strategy, by reinforcing constant Regulatory Dialogues with target countries to foster international regulatory convergence and harmonisation.

Finally, the Market Access Database is largely deemed effective and user-friendly, but there are requests for more information on non tariff barriers, services, intellectual property rights, investment and emerging markets, improved interactivity with business who lodge complaints on barriers, better updating of the barrier section and enhanced promotion of the tool.

## INTRODUCTION AND GENERAL OBSERVATIONS ON THE CONSULTATION

The Global Europe Communication<sup>1</sup> identifies the improvement of market access abroad for European Union exporters as a key part of the objective of increasing European competitiveness in global markets and creating growth and jobs.

A recent evaluation study conducted by external consultants<sup>2</sup> also suggested that many EU exporters believe the Market Access Strategy needs to be renewed and re-shaped in order to increase its effectiveness.

On 10 November 2006, the Commission's services issued a consultation paper on the European Union's Market Access Strategy in the changing global economy (the Market Access Strategy consultation) and posted it on the External Trade portal.<sup>3</sup> The aim of the Market Access Strategy consultation was to launch a debate to find out whether the EU and in particular External Trade need to improve the existing approach.

The Commission services invited all interested parties to send their answers and comments on the 8 questions using the Interactive Policy Making (IPM) system, by 19 January 2007.

In line with the Commission's general principles and standards for consulting interested parties, this report analyses the contributions received from EU companies, trade associations, Member States, civil society and other contributors.

The objective of the report is to reflect the ideas, opinions and suggestions made by the respondents. It identifies the main views and concerns set out in the contributions in order to enable those participants in the public consultation to have as complete a view as realistically possible of the replies. For the sake of transparency, we have kept the structure of our 8 questions in the analysis of the consultation results, but some issues which have been flagged by respondents repeatedly under various questions have been regrouped for improved readability.

In addition, also for the sake of transparency, the identity of all contributors who have not objected to publication of their names is annexed. More than half of the contributors wished to remain anonymous, which however also shows that despite the sensitivities, many interested parties still wanted to take part in the consultation.

The report is structured as follows: Executive Summary, Introduction and General observations on the consultation, followed by the detailed analysis of the answers and

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<sup>1</sup> Commission Communication "The global challenge of International Trade: a Market Access Strategy of the European Union" COM (96) 53 final of 14.02.1996.

<sup>2</sup> Crowell and Moring (2006), *Final report for the project on the Evaluation of the European Union Market Access Database* ([http://trade.ec.europa.eu/doclib/docs/2006/november/tradoc\\_130518.2.pdf](http://trade.ec.europa.eu/doclib/docs/2006/november/tradoc_130518.2.pdf))

<sup>3</sup> A presentation of 11 types of trade barriers in the modern global economy (from tariff barriers to use of state aids and other subsidies by third countries in a way that constitute Market Access barriers, through barriers to trade in services) was loadable via the link to the consultation document and on External Trade portal.

comments received . The structure of the detailed analysis follows the order of the questions set out in the Market Access Strategy consultation.

The percentage of "votes" of stakeholders in favour or against one or the other position is indicated for each of the "closed" questions (Yes/No). In some cases, the indication of these percentages is potentially highly misleading as some interested parties sharing the same interest (such as firms operating in a given sector) submitted nearly identical positions, rather than sending just one coordinated contribution via their EU association, as other interested parties did. It was eventually decided to keep the "votes" in the report in the interests of full transparency but undue weight should not be placed on these aspects of the report.

In total, the Commission received 150 replies to the list of questions set out in the consultation paper so far and others are still announced. This figure is above the usual number of responses to public consultation with a majority of open questions. Moreover, many replies are consolidated answers, representing a large membership base or the views of different departments in a national administration.

37% of the replies come from EU or national trade associations, 24% from Member States or public or semi-public institutions, 11% from larger companies, 9% from associations of Small and Medium Sized enterprises, 6% from EU Small and Medium sized Enterprises, 6% from civil society organisations and 7% from other contributors. The strong representation from Belgium, Spain, Germany and France was notable. The fact that most of European Federations are Brussels based probably explains why Belgium scored highest in the number of responses.

Once again, this report does not aim to draw political conclusions from the consultation process as such. The results of the consultation will however be an extremely important source for the Commission in bringing forward proposals for a renewed and reinforced EU Market Access Strategy.

## THE MAIN RESULTS OF THE PUBLIC CONSULTATION

### **1. A new approach to identifying and addressing barriers with Member States**

#### Question 1

Do you favour new approaches to enable the European Commission to work more effectively with Member States to anticipate likely problems in third markets?

#### Main views of stakeholders

- **Nearly all the contributors favour new approaches in the work of the Commission with Member States, not least "on the ground"**
- **Coordination and exchange of information could be improved by establishing a "trade barriers network" and increasing the use of databases**
- **More consultations on specific market access issues between the Commission and the Member States are requested together with more involvement of business, e.g. by reinforcing the Market Access Advisory Council, involving business more in the 133 Committee and establishing local trade committees in third countries**

#### **1.1 Need for new approaches in the way the Commission and the Member States work together**

Nearly all the contributors (92%) favour a new approach to identifying barriers with Member States. A number of these nevertheless indicate that the services supplied by the Commission are already of satisfactory quality.

#### **1.2 Better coordination and exchange of information between Commission and Member States**

There is broad support for improving the coordination and sharing of information between the Commission and Member States in order to anticipate likely problems in third markets, with a particular focus "on the ground".

Respondents mention different means for achieving this. Some suggest establishing a "trade barriers network", e.g. along the lines of the European Info Centres (EIC), involving the Commission and the Commission Delegations, Member States and their embassies and Member States/national business associations. Some respondents particularly stress the importance of the information flow between the Commission services, including the Commission Delegations, and the embassies of the Member States. One respondent suggests that Commission Delegations and the embassies of the Member States should share informal legal analysis of laws and regulations that affect market access. Another contributor proposes to establish an online trade barriers

network between the European Commission and the embassies, citing SOLVIT as a possible point of reference.

Databases are perceived by some contributors as a very good tool. One respondent mentions exchanging information between databases developed by Member States and the Commission services on market access barriers.

Some also propose to develop the contact function of the Chambers of Commerce in order to provide companies with information on a local basis.

### **1.3 More consultations on specific market access issues**

Many respondents request more consultations on a regular basis between the Commission and Member States on market access issues and specific trade barriers in third countries. There is a wish for making as much as possible of the information from these meetings public.

Several contributors, including some Member States, propose to make the Market Access Advisory Committee (MAAC) a more substantive body so that it can discuss actual trade barrier cases and other relevant issues. Some suggest that it should also discuss the implementation of the Market Access Strategy on a regular basis, e.g. prioritisation of third countries, promotion of the MA strategy on a national level, exchanging best practice in terms of cooperation between Member States, exchange of information on trade barriers dossiers and providing guidelines for dealing with various types of barriers, thereby contributing to the establishment of common methods of work between the Commission and Member States. This reinforced MAAC should, according to some, be closely linked to the Article 133 Committee, or meet in 133 Committee formation. Some suggest that selected business representatives should be invited to at least parts of these meetings to provide feedback, and more generally be better involved in the Article 133 Committee.

There is also a proposal for ensuring that market access issues are tackled more systematically in the meetings of the EU's Economic and Commercial Counsellors in third countries, with an agenda point consisting of new problems, barriers or areas of concern raised in the MAAC.

One contributor proposes the establishment of local trade committees in third countries.

Another respondent suggests establishing market access working groups under the umbrella of the EU Chambers of Commerce in the respective third country, involving Commission Delegations, Member State embassies, national chambers of commerce and business representatives. The activities of the EU Chamber of Commerce in China are mentioned as a point of reference in this respect.

## **2. New working arrangements with EU business**

<i>Question 2</i>
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Do you favour new arrangements to improve the flow of information between business and the European Commission on trade barrier problems?

*Main views of stakeholders*

- **Nearly all the contributors favour new arrangements to improve information flow between business and the Commission, with a particular focus "on the ground".**
- **The exchange of information could be improved by more promotion of market access activities, more information on relevant contacts within the Commission, the establishment of a "one-stop-shop" for market access in the Commission, the publishing of trade barriers reports for key markets, more information on how business should give input as well as better procedures for feedback from the Commission, the establishment of an "early-warning system" on up-coming third country laws and FTAs.**
- **EU business requests participation in meetings with third countries in Brussels and abroad, more direct involvement in trade negotiations, the establishment of trade barriers advisory committees and regular fora for discussion between business, the Commission and possibly Member States**

## **2.1 Call for new working arrangements**

Nearly all the contributors (92%) favour new arrangements to identifying barriers with European business.

## **2.2 Improving the exchange of information between business and the Commission**

There is a strong call for better flows of information between the European Commission and business, particularly in making the best use of the available information and resources "on the ground".

Many contributors comment that the market access activities of the Commission are generally not very well known in the business community, and request a "communication campaign" on the Market Access Strategy. Some respondents stress that the emphasis of the campaign should be on SMEs. Making success stories in removing barriers better known is highlighted by many as a key issue to encourage more exporters to come forward with their problems.

Many call for better information on relevant contact names inside the European Commission. Many also favour establishing a "one stop shop" within the Commission for market access related complaints. A large number of contributors mention that contacts between the Commission services and business should take place through sectoral associations, be they European or national.

Some contributors call on the Commission services to issue reports on tariff and non-tariff barriers in our top trade partners, including information on progress made on removing barriers, as a basis for refined exchanges of information.

Many also suggest that business could provide the Commission with more information, in particular to enhance the identification of barriers. Some propose to establish a mechanism for the publication of main issues in a specific sector, relying on input by representative bodies of this sector, and involving regular updates.

However, the Commission is called on to provide more detailed information on what is necessary for the presentation and substantiation of trade barriers in input from business (e.g. standardised information request, model submissions, and guidance on key facts needed in bringing the most common forms of trade barriers to the attention of the Commission).

Many contributors stress that confidentiality in contacts with business is essential.

Many respondents also request better procedures for receiving feedback (after business has filed a complaint) from the Commission.

Many contributors mention the need for an "early-warning" system on up-coming legislation or new preferential agreements in third countries. Some mention that such a monitoring system should be set up in the Commission Delegations, noting that the delegations would then need more resources.

One contributor notes that it is often difficult to provide the European Commission with the necessary information within the short timeframes before meetings with third countries etc., suggesting an alert mechanism ahead of meetings to inform key stakeholders at an earlier stage that information will be requested.

Other proposals for enhancing the flow of information between the Commission and business include training sessions, conferences, workshops, "road shows" throughout Europe, an e-newsletter on EU market access, "informal" e-mails to interested groups of business and a process by which Commission services would seek information using on-line tools such as the one used for the on-line consultation on Market Access Strategy.

Respondents also call upon the Commission services to make better use of the information produced by EU business, notably through Chambers of Commerce, or the information provided by international organisations such as WTO or UNCTAD.

A few respondents call for better coordination inside the Commission.

One contributor proposes to provide business with more information on the various trade policy instruments which the Commission has at its disposal.

A respondent calls for an examination of the possibility to extend the competencies of the European Info Centres to cover market access in third countries.

One contributor suggests providing more detailed information on the External Trade website concerning market access initiatives towards third countries and bilateral relationships in general.

## 2.3 Proposals for active participation of EU business

Most stakeholders plea for reinforced cooperation between business, the Commission and Member States allowing for stronger action on removing trade barriers, especially "on the ground". Some of them mention that this is an issue of "credibility" of the European Union in this matter.

Many contributors propose to be systematically involved and to participate in meetings with third country representatives in Brussels. They also express an interest in participating in missions of the Commissioners to third countries where they have market access issues at stake.

Some refer to the practices of various third countries and express a desire for EU business to be more directly involved in negotiation processes, at least when third country business is also involved.

Some propose to set up trade barriers advisory committees consisting amongst others of business representatives, offering advice on priorities in negotiations, initiatives against non-tariff barriers, promotion efforts etc.

Some contributors mention possibly formalized or structured fora of discussion between the Commission services and business, maybe extended to Member States to allow for increased efficacy of implementation measures.

There are also proposals for preparing the market access symposia in close cooperation with business organisations, and for an annual seminar to examine the most important market access issues at stake.

Others representing business sectors mention their positive experience of the market access pilot projects on pharmaceuticals in removing trade barriers and suggest that this project is extended to all sectors.

One contributor calls for more systematic participation and support from the Commission regarding EU business summits with third countries.

### **3. Additional special features as regards SMEs**

#### Question 3

Should the European Commission's Market Access Strategy have additional special features to better suit the needs of Small and Medium sized Enterprises?

#### Main views of stakeholders

- **Large request for attention to the specific needs of SMEs**
- **The exchange of information could be improved by measures such as making the Market Access Strategy better known through a communication campaign, making the assistance on the ground more effective, setting up a trade help desk for SMEs and better cooperation between networks which are in contact with SMEs**
- **SME associations should be better represented in fora where market access issues are discussed and some would be willing to participate in a think tank dedicated to market access issues for SMEs**

#### **3.1 Request for particular attention to specific SME needs**

Most of the respondents (77%) favour special features to better suit the needs of Small and Medium sized Enterprises (SMEs). However, some of the remainder (who do not believe that additional special features should be created for SMEs) include SMEs. Respondents who replied "no" to this question explain that market access issues are matters of concern for all companies regardless of their size.

#### **3.2 Improving information flows between the Commission and SMEs**

Many respondents suggest that SMEs should be a target for an information campaign to be launched on the Market Access Strategy. According to one contributor, Member States and the Chambers of Commerce should be involved in this campaign. Many also propose to make the Market Access Database better known among SMEs, e.g. through national bodies representing SMEs, particularly in the new Member States.

The importance of assistance "on the ground" is highlighted by several contributors.

Many request a contact point possibly in the form of a dedicated SMEs' trade help desk, perhaps on-line, involving legal and practical advice. Some respondents would like to have these helpdesks set up in Delegations especially in emerging countries, possibly through a reinforcement of the Commission Cooperation with the Chambers of Commerce. Other contributors suggest that the Commission Delegations could service trade sections of Member State embassies with improved information on market access issues.

Respondents stress that cooperation is necessary between networks which are in contact with SMEs, such as the European Information Centres and the Chambers of Commerce, and between networks whose responsibilities could be extended to

informing SMEs on market access. Regarding the latter, some contributors mention the agencies in charge of export promotion in Member States or Member States themselves. One respondent stresses that useful exchanges of experience could more easily occur by involving a variety of networks in the implementation of the Market Access Strategy.

A few mention that networks located in each Member State could offer a more adapted service as they use national languages. Some respondents also mention the question of language more generally, suggesting setting up free phone numbers with information in the national languages on the barriers which SMEs encounter.

Contributors request more information on export markets including third country commitments concerning all types of barriers (World Trade Organisation, bilateral or regional trade agreements), practical information on how to access various sectors (name of the authority/regulator, contact details and website), contracts etc. Some suggest that this could be made available through the Market Access Database, if upgraded properly. If this were done, no special “SMEs section” would be necessary.

Other respondents propose that SMEs should be provided with case studies, thus matching some consultancy practices. It is suggested that a “guidebook” on how to recognize barriers and cope with them should be published by the Commission services and disseminated through training and seminars by national business and trade associations in Member States. Several contributors offer their help to provide information to the Commission on these issues.

One contributor calls for a simplification of terminology and enhancement of transparency and accountability particularly with SMEs in mind.

Another contributor suggests that the Member States, with the Commission, could arrange activities similar to the EU's Market Access Symposium in their countries, in order to reach out to SMEs and others who are not aware of, or do not have resources to attend, the symposium in Brussels. One contributor suggests inviting SME speakers to the EU symposium.

One respondent proposes that the Market Access Strategy and the Market Access Database should principally serve SMEs.

### **3.3 Active participation of SME associations**

Some contributors, for example from Chambers of Commerce or national federations, offer to participate in a regional think tank dedicated to market access for SMEs in some target countries. A proposed topic for research is the transactions costs borne by SMEs.

Some contributors propose that SMEs should be better represented in fora where market access barriers are discussed or tackled. One respondent proposes to develop such initiatives in the context of model partnerships between the Commission services and SME trade associations.

## **4. Prioritisation of barriers, markets and sectors in the Market Access Strategy**

### Question 4

How should the Commission prioritise trade barriers, markets and sectors to be addressed by the Market Access Strategy?

### Main views of stakeholders

- **Prioritisation is supported in particular by the majority of the federations**
- **Economic potential, blatant violations of international commitments, market access issues of vital interest, and existence of leverage in negotiation are perceived as the main criteria to apply for prioritisation.**
- **In terms of specific countries to propose as priorities, , there was near unanimity that we should focus on main EU trading partners and emerging countries**
- **On sectors, full consensus on economic criteria based on current and potential commercial and competitive weight, using measurable parameters.**
- **On the type of barriers, prioritisation should be based on their potential trade distorting effects and the likelihood to eliminate them within a realistic timeframe.**
- **On instruments, the majority of respondents underline bilateral agreements and regulatory cooperation.**
- **In implementing these criteria, there should be a regular dialogue with the EU Commission and Member States, enabling the tackling of priority barriers in a result-driven way.**

### **4.1 Support for notion of prioritisation**

Most contributors fully endorse the principle of prioritising market access barriers, given resources constraints of the European Commission.

Some respondents, however, agree with prioritisation, but they do not like the idea of discrimination between sectors. Prioritisation should guarantee that all sectors affected by serious trade restrictions should be taken into account. According to one contributor, such an approach would acknowledge the fact that some lobbies possess more resources than others. They highlight the necessity of some flexibility in implementing criteria for prioritising barriers

European federations with experience of prioritisation express their satisfaction with the practices currently implemented by the European Commission (textiles and pharmaceuticals).

Two Member States suggested the Market Access Advisory Committee (MAAC) as the appropriate forum to agree on priorities. Other MS recommend that each Member State should create a matrix of current and potential barriers, to guide the Commission to set up its priorities, after discussion within the 133 Committee or the MAAC.

## 4.2 Main criteria to apply in prioritising

A majority of respondents thought that economic criteria should be found to reflect the economic potential of removing the barrier. One respondent argued that an assessment of the economic impact is made systematically when presenting a market access barrier as a candidate for prioritisation. But it was also argued that the selection should be made in a transparent way, using measurable parameters such as market share reduction in sectors and markets, and jobs at stake in Europe due to known barriers.

Some respondents highlight issues of vital importance for European companies, such as access to raw materials, and more generally barriers of high importance in the value chain of EU business.

For other respondents one criterion for prioritisation should be the incompatibility of the barriers with WTO commitments: among them, some of them prioritize those barriers that can be challenged under WTO agreements, while others choose those barriers which cannot, and therefore need special attention and protection.

**On countries:** most contributions believe that the EU should concentrate its efforts on the removal of barriers on its main trade partners (US, Japan etc) and on the emerging countries (China, Brazil, India), due to their size and potential market growth. Current and future FTA partners have been widely mentioned, and some respondents consider neighbourhood countries (Russia, Ukraine and Balkan States) as targets for prioritisation.

Replies from the services sector refer to those countries which repeatedly challenge international rules on technical regulations.

Several contributors mention the reduction of regulatory divergences between European Union and the United States to be of high economic interest.

One respondent stresses that removing trade barriers is more important than listing them, suggesting that the European Commission should concentrate its resources on the largest third country markets and the sectors in which goods or services are most heavily traded. Another contributor mentions the restrictions to market access to the EU candidate countries.

**On sectors:** Prioritisation on the basis of sectors is not as strongly supported as prioritisation on the basis of different countries, for it would mean to select some to the detriment of others, which is perceived as not realistic. Services and investments have been pointed out by a great many respondents.

Criteria mentioned for sector prioritisation include: potential for growth, current commercial and competitive weight (with a view to achieve EU competitiveness objectives through its external trade policy), and sectors more affected by globalisation implying more potential for technological innovation (energy distribution, transport, infrastructures etc).

Respondents from the services sector express clearly the need to improve market access conditions in third countries in services, because of the high contribution to EU GDP and jobs that the sector makes. Among them: investments, telecommunications, audiovisual and cultural industries. Specific cooperation agreements in the framework of this Market Access Strategy could be beneficial for the audiovisual sector.

Respondents from sectors affected by restrictions on access to raw materials in third countries asked for special attention to this issue, given the negative effects these barriers have on the competitive position of EU business. For one contributor priority setting should take into account specialization of EU exporters at international level.

One respondent has called for the MAS to deal with agricultural goods in particular.

**On particular barriers:** For many respondents the prioritisation of particular barriers should be based on their potential trade distorting effects and the likelihood to eliminate them within a realistic timeframe. Most replies refer specifically to barriers related to regulatory issues and intellectual property, in respect to which EU exporters feel unprotected. There are also many requests for a high priority to be placed on barriers to investment, and one respondent asks the MAS to mention the recently concluded discussion amongst Member States on investment, with indications on how to implement the "minimum platform" in the future bilateral agreements.

One respondent not affected by market access barriers related to geographical indications asks specifically for the MAS not to give special priority to this issue.

Another respondent quotes limits to modes of supply and investment in third countries as being important for a large number of European companies, regardless of their sector.

There is one mention to the increasing number of barriers based on environmental, toxic and chemical risks.

One Member State proposes that EUs major exporting industries submit to the Commission a list of the major barriers they are facing, which would help the Commission to focus its activities on the real priorities to be addressed.

**On instruments:** To address trade barriers, the majority of respondents ask for bilateral agreements aimed at the removal of non tariff barriers not covered by WTO agreements, with a clear message on the need to create a mechanism to ensure that EU trade partners meet their obligations (see point 5.2).

A number of respondents also stress the need to continue, in parallel, with WTO negotiations for the removal of barriers at the multilateral level.

Secondly, for many respondents, priority should be given to those actions aimed at promoting the international harmonisation of technical regulations and standards through the regulatory dialogue between the competent regulatory bodies. Regulatory cooperation is seen by some respondents as an instrument to ensure the effective monitoring of domestic regulation, especially for contributions from the services sector (insurance, financial, audiovisual, telecommunications, transports), who also

claim there is an urgent need for action in the field of IPR enforcement and protection.

Some respondents ask for the simplification of the mechanism to apply Trade Defence Instruments. They ask for a reform and a limitation of its use, and ask the EU to introduce public interest and the "lesser duty rule" in the WTO-AD agreement. Trade barriers on imports are mentioned by one contributor, who refers to Trade Defence Instruments, and states that market access issues should also concern consumer interests.

Cooperation with other countries equally affected by specific barriers and negotiations based on the principle of mutual recognition has also been proposed.

Two replies mention the barriers in e-commerce, given the current importance and increasing potential of this new type of distribution channel.

One respondent proposes to take into account the development angle by prioritising third markets only when local production does not exist.

A contribution from a civil society organisation says that sectors which can have a negative impact in the society (such as alcoholic drinks) should not be prioritised.

### **4.3 Importance of regular dialogue with business and Member States**

The selection of barriers should be made with a regular dialogue with business and Member States to set priorities and key barriers. Some respondents mention that the barriers are already well known by sectoral federations and that moreover, acting without them would in any way be wrong.

Some respondents state that the European Commission should be free to determine its priorities with as little political interferences as possible, in order to avoid rigidities and to deliver on removal as the main objective.

One contributor mentions that market access also concern the consumers interest, and wants therefore Civil Society to be involved in the priority setting. One contributor wants trade unions to be consulted in order to examine the possible environmental and social costs of removing a barrier. Some others make the case for Member States to scrutinise the section of barriers and to bring their points of view to the attention of the Commission on a regular basis.

One contributor agrees that one specific aim should be to show to European exporters that their complaints on barrier are properly tackled by the Commission, so that they can report on future ones. A number of respondents express preference for "scoreboards" indicating the degree of urgency of market access barriers.

Many more indeed want regular reports to be issued to present the state of play and to indicate what progress has been achieved on priority market access barriers: this should in turn attract interest.

One respondent raises the difficulties SMEs may find in providing the necessary information.

Globally, contributors expect the European Commission to foster a result-driven approach to eliminating priority market access barriers.

## **5. Changes to ensure faster and more effective tackling of barriers**

### Question 5

**What changes to existing EU approaches would help ensure faster, more effective resolution of issues for EU exporters?**

### Main views of stakeholders

- **Improved communication and coordination between business, Commission, and Member States, with a continuous feedback to business on the state of play on each case. Need to reinforce the response capacity of the Commission Delegations and Member States Embassies in third countries, and their cooperation on the removal of trade barriers. More human resources for Commission's market access work.**
- **Negotiation of bilateral agreements, strong enforcement of commitments and reinforcing the use of the Trade Barriers Regulation as the main changes to address non tariff barriers more effectively.**
- **More prevention and anticipation of barriers by a constant Regulatory Cooperation dialogue with trade partners. More attention to implementation and enforcement, especially in services.**

### **5.1 Improved communication and coordination between business, Commission and Member States, with regular feedback to business and a clearer role for the Delegations**

On the information on barriers, a few respondents mention the creation of a report by country listing all barriers, progress made on them and ways to proceed for the EU companies. This is especially important for SMEs who do not have the resources themselves to investigate about the market access conditions in each target country.

On the actions taken by the Commission to tackle barriers, a number of respondents ask for a regular feedback to EU business on the measures adopted by the Commission to solve barriers and the results achieved, to provide credibility, transparency and accountability and to motivate companies to convey the relevant information. Several replies recommend the creation of specific guidelines on the procedures to be followed by the Commission upon receiving information from EU companies, deadlines to respond to them and to outline what progress has been achieved.

The majority of respondents consider that a better coordination between all actors (Commission, Member States, EU delegations, Embassies, and EU business representatives in third countries) in the systematic follow up of the work on barriers could lead to improve their effectiveness. The case of the EU Chamber of Commerce in China is mentioned as a very positive experience in this direction. Some replies mention Chambers of Commerce, local business organisations and international working groups. The list of barriers should be discussed with business representatives before high level meetings between the Commission and authorities from third countries.

Few respondents ask for a coordinated action with the EU main trading partners to jointly tackling those barriers of interest for both sides. One respondent proposes to establish a formal negotiating mechanism with third countries that aims to resolve complaints within a set timetable.

Numerous replies ask for the reinforcement of the EU and Member State diplomatic capacity on the ground and their cooperation on the removal of trade barriers. A way to achieve this could be by reinforcing the human resources in the trade sections in the EU delegations and by an increased involvement in trade issues, by reacting more effectively to the complaints posed by EU business and SMEs operating on the ground, in particular, ensuring exporters that the EU is raising the issues with the authorities of the third country.

In relation to the implementation of the MAS, numerous replies suggested that the Market Access Unit should be a central point for the implementation of the MAS and contact point for business to exchange information on barriers. Enough resources should be allocated to that Unit to deal with the tasks assigned and to not create false expectation among the EU business. Other contributions underline the limitation of resources available to the Market Access Unit, if compared with the Trade Defence divisions of DG Trade.

One Member State and one contributor from the private sector disagree with the idea of the creation of a market access agency and changes to Committee procedures mentioned in the report of the consultant.

## **5.2 Main methods of addressing barriers more effectively**

Several replies point out that the need for short term oriented strategy can be fulfilled by negotiations for bilateral agreements, which should pursue a drastic and definitive reduction of non tariff barriers in a limited period of time. In this line, most contributions favour the negotiation of bilateral agreements with key trading partners and with emerging countries, regardless of progress in the DDA, to cover, in particular, the violations not covered by WTO agreements such as regulatory cooperation, intellectual property, sanitary and phytosanitary issues, access to raw materials (particularly export taxes), public procurement and subsidies. Bilateral agreements should include services (mentioned by all replies from this sector).

The biggest consensus on question 5 refers to the need to ensure that EU trade partners meet their obligations, especially those agreed in the framework of bilateral agreements. The lack of effective dispute settlement provisions under most existing bilateral agreements has been also expressed as the main weakness for the EU market access, mainly in technical and regulatory issues. To achieve this, most replies favour the two following proposals:

- To extend the use and effectiveness of the Trade Barriers Regulation (TBR) as a mechanism to cover violations of bilateral agreements beyond violations of WTO rules, simplifying the information required to companies, widening the basis for this instrument to allow addressing a broader range of trade barriers. This issue is

considered especially important for SMEs, who need more support from the Commission in collecting evidence on the complaints. The Commission could also consider introducing a mechanism less onerous than the TBR to assist SMEs with their trade barriers. One Member State considers that the Trade Barrier Regulation should be promoted in order to increase awareness of it with key stakeholders, and that the TBR Committee should be updated more often on the progress on cases.

- To set up a voluntary mediation mechanism or an alternative dispute resolution mechanism in the framework of the bilateral agreements to prevent disputes, to allow violations to be adequately and timely addressed and, mentioned by a few, the removal of all preferences in the event of severe violations of the agreement.

A few respondents ask for a more offensive approach of the Commission to defend the right of EU exporters to get access to third markets by applying reciprocity on EU imports if necessary, particularly for sanitary and phytosanitary issues, using EU imports from the third country concerned as leverage to defend EU business rights violated by the infringements. Other respondent requests the European Commission to refrain from reciprocating trade barriers erected in third countries. One respondent is strongly opposed to the introduction of any automatic retaliation instrument in the field of public procurement.

One contributor highlights that trade negotiations can have implications for a broad range of issues. Accordingly, it is stressed that national governments and the European Commission should involve all ministries and Directorates-General respectively in the trade policy making, and that the voice of civil society should be taken into account.

### **5.3 The importance of Regulatory Cooperation dialogue with trade partners**

Barriers, once established, often take time to remove. Most contributions point to the need to establish mechanisms to anticipate new technical regulations from third countries which are inconsistent with international rules and act before it is too late. Regulatory dialogue with main trade partners and emerging countries is seen as the appropriate instrument for regulatory issues, standards and intellectual property, with the participation of the sectors involved. One contributor mentions the benefits of cross border cooperation in the internal market in telecommunications to illustrate how the EU has solved this problem in the past.

Setting up trade facilitation and capacity building programs is indicated by a number of replies as the way to constructively cooperate with trade partners to help them to meet international standards and /or EU regulations. Market access conditions in a country should be considered when planning Technical Assistance. The EU should push at international level for the international harmonisation of technical standards and regulations.

Other mechanisms cited are the dissemination of WTO notifications on regulatory issues to EU business, which could help to react before those regulations enter into force. One reply refers to the convenience of reinforcing the position of the EU in international institutions for regulatory issues.

For one contributor there should not be EU Trade policies but a total liberalisation. For another contributor the EU should give example by removing the CAP.

## **6 Effectiveness of EU Market Access Database in informing exporters**

### Questions 6

In general, do you feel the MADB is effective as a tool for exporters in its current form?  
Is it user friendly?  
What works well? What works less well?

### Main views of stakeholders

- **Nearly all the respondents find the MADB both effective and user friendly**
- **The tariffs database and the exporters guide to import formalities works well, whereas the sectoral and trade barriers database needs improvement**
- **The MADB needs more updating, interactivity, promotion and more information on areas such as non tariff barriers, services, IPR, investment and emerging markets in general**

### **6.1 The MADB is effective and user-friendly but needs improvement**

Most of the respondents find the MADB both effective (83%) and user-friendly (84%), though SMEs were less happy on both counts.

Among the few who replied that the MADB was not effective, comments indicated among other things that the MADB lacked coverage. This was often related to a perceived lack of information on services.

Respondents replying that the MADB was not user-friendly also commented that the existing information was not structured well enough (e.g. one contributor proposed categories such as "News", "Latest updates", "Latest publications" etc) and that the studies database did not contain enough material (for instance, WTO documents are requested by one contributor).

Looking at the respondents as a whole, however, the majority find that the MADB is an effective and user friendly tool in its present form.

### **6.2 The tariffs database and the exporters guide to import formalities works well, but the sectoral and trade barriers database needs improvement**

Most of the respondents say that the applied tariffs database and the guide to import formalities are the best tools of the MADB. A few believe, however, that the tariffs database needs to be complemented with more data on preferential rates such as GSP rates and that the reliability of the data should be improved. One contributor requests better overview information on tariffs and import formalities for a group of products, a sector or an industry.

A few also mention the SPS database and the statistical database among the parts of the MADB that work well. One contributor commented, however, that the statistical database did not allow for analysis of data.

The sectoral and trade barriers database is often identified as a tool that works less well (see in more detail below 6.3 and 7.1) Few mention the studies section. One contributor suggests that this section should be expanded to include studies not commissioned by the Commission. Those who mention the Trade Barriers Regulation link indicate that they do not find it very useful.

### **6.3 Need for more updating, interactivity, promotion and more information on other areas**

Many respondents seem to agree on the following three actions to improve the MADB. Firstly, they suggest that it could be improved by updating the content of the barrier section in particular more frequently. A few add that the updating should be done in coordination with other DGs, especially DG Enterprise, Commission Delegations and EU business.

Secondly, many would like to have a system that allows for more interactivity. One suggestion is to establish a system where stakeholders can take an active part in shaping the content of the MADB, updating it etc., together with External Trade. Another proposal is to introduce a system that automatically informs stakeholders concerned about updates and other changes in the database, as well as an "early-warning system" indicating expected new trade barriers or new liberalization measures. Still, a few also say that the level of interactivity of the MADB is currently good.

Thirdly, many respondents indicate the need for more promotion of the MADB. This refers not only to making stakeholders aware of the MADB as such, but also to publicise better the actions and the results from the MADB and the market access efforts of the European Commission in general.

The contributors have also made a number of other suggestions for improving the MADB, though there is less agreement than was the case for the three proposals above. These suggestions include a broadening and deepening of the information provided in the database. More information is requested on areas such as emerging markets in general, IPR, investments, export restrictions/export taxes, regulatory barriers, services, sanitary and phyto sanitary measures, public procurement, anti-dumping, market access requirements (e.g. standards, market approval requirements, licensing requirements etc.), as well as details on the responsible national authorities, rules of origin (especially with regard to FTAs), customs preferences for products from various countries - including information on other countries' FTAs and import barriers due to EU regulations. Some contributors call for a concentration on the EU's main trading partners and on large emerging economies, whereas others have requests for including more, often smaller economies into the MADB.

Other proposals include the standardisation of the presentation and content of the sectoral and trade barriers database, including a simplification of the terminology used

and user guides, more progress reporting on the solving of trade barriers (e.g. a short annual progress report available on the MADB website).

There are also calls for concentrating the resources of the European Commission more towards the resolution of trade barriers, with the MADB focussing on more targeted, key information on priority markets, barriers and sectors.

It is suggested that information on new trade barriers could be sought from new trade barriers notifications to the WTO, and that Member States could increase their efforts in collating information to be put on the MADB.

One Member States said that it would be interesting for Member States to have access to the Commission's "confidential" version of the barriers sections of the MADB (showing the internal exchanges, work in progress, etc). This respondent also proposes using the information on barriers of the MADB to create a sort of internal "black list" on the major barriers in third country markets.

Another respondent suggests that the MADB could provide information on sources of third country legislation regulating market access, reference material on the legal and other means of redress and examples of concrete cases that have been addressed and information on the status of a complaint and expected time of solution.

One contributor wants a further breakdown of the sector categories in the Sectoral and Trade Barriers Database into more sub sectors, such as breaking down the Agriculture and Fisheries sector into, for instance, a Fruit and Vegetable sub sector.

Another contributor notes that sometimes different import tariffs are quoted in the MADB compared to official information provided by the various countries.

One respondent would like the possibility to view the whole tariff structure of a country, rather than just on a product by product basis. Similarly, there is a request for statistical information on global trade and not only figures by products.

One respondent would like the MADB to have information on applied port charges.

There is a proposal for links to relevant studies in the studies section to be included in other parts of the database, and a suggestion that data from the ITC/UNCTAD trade database on historical trade flows and other data should be incorporated into the MADB.

Other respondents call for the translation of the MADB into all official EU languages.

One contributor suggests that the design of the database should be reviewed, in order to make the database as modern, dynamic and attractive as possible.

## 7. Views on the scope of EU Market Access Database

### Question 7

What would need to be changed (in the MADB) to serve your needs better?

### Main views of stakeholders

- **Many replies consider that the MADB covers the right range of information. The changes to be done refer to adding information on bilateral agreements between third countries, on services, investments, IPR, technical regulation and standards, contracts, export restrictions, transport conditions etc. On barriers, most contributors ask for a more systematic way to register barriers and allow companies to contribute with information on their experiences. The interactive character of the MADB might be improved by a better identification of the Commission staff responsible for each section.**
- **Most replies show satisfaction with the range of countries. Proposals for changes refer to focus on emerging and main trading partners, while few also ask for the inclusion of more African countries.**

### 7.1 Does the MADB have the right content?

A majority of the respondents (63%) indicate that the MADB cover the right range of information on export conditions and on barriers.

#### **- On the general content that the MADB should**

A number of replies propose the following areas for which information can be improved:

- A focus on information on barriers on main trading partners, on emerging countries and on Non Tariff Barriers.
- On bilateral agreements between third countries and their preferential rates.
- On services and investment.
- On intellectual Property and regulatory issues.
- On contracts, useful for helping SMEs to solve the problems when signing contracts;
- On export taxes, licensing, dual pricing, subsidies etc; updated and more comprehensive information on additional duties and taxes.
- On resolutions of the WTO Dispute Settlement Body.
- On TDI.
- On barriers on establishment (for EU subsidiaries).
- On transport and logistics, which have a great impact on the supply of the service itself and on the goods to be transported.
- A more operational treatment of the information currently provided by the database on tariffs (to allow for peak tariffs per product, simultaneous search of tariffs for a given product in all countries) and on statistics (to process statistical data in a more operational way).
- Regular and updated country reports on priority countries.
- Translated version in the web site of each Member State Ministry of Trade.

- Links to other websites.
- Inter regional information (i.e. conditions to export from the EU to China-Vietnam-Malaysia and so on).

***- On the barriers section***

- Improved information on barriers on Services and Investments.
- Updated content of this section by providing continuous information on actions and results and by appointing a source of information on the ground in coordination with the delegation.
- A systematic matrix of most common barriers per sector,
- A standard form and guidance to help users to log information on barriers, where companies could provide information and notifications on the barriers encountered.
- Prioritisation of the most important barriers.
- Updated sanitary and phytosanitary measures and information on expected measures.

***- On the inter activity with users***

A general and frequent comment referred to the need to improve the interactivity of the MADB with business by providing business a direct link for the submission of market access problems, by identifying the Commission official in charge of collecting the information from companies or associations, by incorporating information conveyed by business on barriers encountered, and from Member States and Commission on barriers solved.

A few respondents ask for a single point of contact to provide information per third country on national regulators and regulations in different areas, as well as on conditions to export by sector.

Others felt that a notice should be sent to users each time new information is introduced in the database, that there should be a deadline for answering queries, and that there should be a users' guide translated into all EU languages.

**7.2 Does the MADB cover the right range of countries?**

Most respondents (79%) indicate that the MADB cover the right range of countries. A majority of the respondents favour focusing information on emerging countries and key trading partners, while few referred to the need to cover more African countries.

## **8 Additional comments on the nature and scope of the Market Access Strategy**

### Question 8

Do you believe there are issues which we should consider beyond those outlined above, or do you have more general comments about the nature or scope of the areas outlined for consideration?

### Main views of stakeholders

- **Support for the launching of the re-shaped Market Access Strategy.**
- **Need for coordination and improved flows of information between Commission, Member States and EU business.**
- **More feedback on the actions and results on market access.**
- **Defending assertively the interests of EU business by reinforcing the Trade Barrier Regulation instrument and by creating mediation mechanisms in the bilateral agreements.**
- **Special attention to SMEs needs.**

Contributions to this question have been fewer and shorter than for the former questions, adding no new elements to what has been mentioned before, but rather re-iterating the main messages.

### **8.1 EU business willingness to engage**

Willingness of business and Member States to support the launching of the re-shaped Market Access Strategy is clearly expressed. In this context, some sectoral federations mentioning the educational role played by this public consultation document.

Some contributors flag that the proposed new approach of Market Access Strategy is consistent with the positive approach to globalization which needs to be communicated to European citizens.

### **8.2 Need for coordination and improved flows of information between Commission, Member States and EU business**

For many respondents more coordination between Commission and Member States offices in Brussels and their delegations in third countries and improved information channels between Commission and EU exporters are the first necessary steps towards better market access. The implementation of the Market Access Strategy needs to upgrade the focal points on market access in Brussels and on the ground. A sizeable group of respondents mention the need for more resources being allocated to delegations in key trade partner countries.

For one contributor, one key point is a reform to the various fora dealing with market access issues in the European Union: Market Access Advisory Committee (MAAC), Trade Barriers Regulation Committee and "Trade Policy Committee" (133 Committee). Many Member States asks for a more active and substantive role of the MAAC in identifying, prioritising and exchanging information on barriers and in defining strategies on the basis of the Commission proposals, in liaison with the 133 Committee. One Member State proposes a wider mandate for the MAAC or, as alternative option, the creation of a sub committee of the Article 133 Committee to discuss market access priorities, with key export sectors attendance in some cases. This same respondent proposes that Member States and Commission should jointly decide the agenda for MAAC meetings.

According to one contributor, one pattern for re-shaped cooperation is the cooperation between the European Commission and sectoral federations during 1999/2000 when preparing the negotiation round on GATS.

One respondent views benefits from better use of available information from other international organisations such as UNCTAD.

One contributor mentions the need to involve Civil Society and especially consumers' representatives.

### **8.3 More feedback on the actions and results on market access**

A sizeable number of respondents ask for better flows of information in tackling trade barriers, more clarity on the procedures carried out by the Commission to remove barriers, and constant feedback from the Commission to business on the way the Commission implements the MAS. This would allow for the necessary synergies between public and private efforts. The Commission should publicise its work on market access and on the MADB in a better way.

One contributor considers that the new Market Access Strategy should be reviewed in 12-18 months by EU business in order to know how they perceive its effectiveness in removing barriers.

### **8.4 Defending assertively the interests of EU business by reinforcing the Trade Barrier Regulation instrument and by creating mediation mechanisms in the bilateral agreements**

A number of respondents mention the need to guarantee that international trading rules, to which EU is part, as well as bilateral agreements, contain the necessary measures to defend EU interests. There is a general request for a more offensive application of the Trade Barrier Regulation which enables EU business to act alone and the inclusion of voluntary mediation mechanisms in the bilateral agreements. A few respondents suggest applying reciprocity or removing preferences to those trading partners who do not meet their obligations.

A number of respondents insist on the usefulness of current European Union Trade Defence Instruments as a benchmark: in fact, their perception is that EU is already applying trading rules in a fair way.

For one contributor, the rampant corruption in several countries is becoming a frequent barrier that should be tackled by EU Trade Policy.

There is also a respondent highlighting the issue of competition conditions in third countries regretting that national subsidies introduce distorting effects in international trade. According to another respondent, EU external programmes must include the competitiveness angle more strongly.

## **8.5 Special attention to SME needs**

Several respondents ask the Commission to take into account the special needs of SMEs and their lack of resources and possibilities in terms of obtaining information on the targeted markets, in tackling the barriers imposed by third countries and in using the Trade Barriers Regulation mechanism. Contributions from the audiovisual sector, mainly composed by SMEs, highlight their difficulties in fighting IPR infringements and one contributor from the professional services sector asks for respect to high quality standards for cross border agreements.

## Annex: List of contributors who did not request to remain anonymous

Name	Location	Type
Association of British Insurers	UK - United Kingdom	An EU or a national trade association
Austrian Federal Economic Chamber; (Wirtschaftskammer Österreich, WKÖ)	AT - Austria	A Member State or a public or semi-public authority
Bundesministerium für Wirtschaft und Arbeit, BMWA	AT - Austria	A Member State or a public or semi-public authority
Bundesministerium für Wirtschaft und Technologie, BMWi	DE - Germany	A Member State or a public or semi-public authority
BFB - Bundesverband der Freien Berufe	DE - Germany	A civil society organisation
Bundesverband der Deutschen Industrie (Federation of German Industries)	DE - Germany	An EU or a national trade association
Bureau National Interprofessionnel Du Cognac	FR - France	An EU or a national trade association
CECED	BE - Belgium	An EU or a national trade association
CEFIC (European Chemical Industry Council)	BE - Belgium	Other contributor
Cérame-Unie, the liaison office of the European ceramic industry	BE - Belgium	An EU or a national trade association
Chambre de Commerce et d'Industrie de Paris	FR - France	A civil society organisation
Chemical Industries Association	UK - United Kingdom	An EU or a national trade association
CIAA - Confederation of the food and drink industries of the EU	BE - Belgium	An EU or a national trade association
COCERAL/Euroflour/Euromaisiers/Euromalt	BE - Belgium	An EU or a national trade association
COLIPA – The European Cosmetic, Toiletry and Perfumery Association	BE - Belgium	An EU or a national trade association
Comité européen des entreprises Vins (CEEV) – Comité Vins	BE - Belgium	An EU or a national trade association
Confartigianato Imprese	IT - Italy	An association of SMEs
Confederation of Finnish Industries EK	FI - Finland	An EU or a national trade association
Confederation of Danish Industries	DK - Denmark	An EU or a national trade association
Contact B2B Ltd	UK - United Kingdom	An EU Small or Medium sized Enterprise (SME)
COTANCE – Confederation of National Associations of Tanners and Dressers of the European Community – The European Leather Industry	BE - Belgium	An EU or a national trade association
CRIOC - Research and Information Centre of Consumer Organisations	BE - Belgium	A civil society organisation
Cyprus Chamber Of Commerce And Industry	CY - Cyprus	An association of SMEs
DaimlerChrysler	DE - Germany	A larger European company
Danish Agricultural Council	DK - Denmark	An EU or a national trade association
Danish Shipowners' Association	DK - Denmark	An EU or a national trade association
Dansk Erhverv - Danish Chamber of Commerce	DK - Denmark	An EU or a national trade association
Department of Trade and Industry	UK - United Kingdom	A Member State or a public or semi-public authority

Name	Location	Type
EC Delegation Cotonou	BE - Belgium	A Member State or a public or semi-public authority
Embassy Of Spain -Economic And Commercial Office In Kuala Lumpur	ES - Spain	A Member State or a public or semi-public authority
Embassy of Spain in Brasilia	ES - Spain	A Member State or a public or semi-public authority
ESOA	BE - Belgium	An EU or a national trade association
ETRMA- European Tyre & Rubber Manufacturers' Association	BE - Belgium	An EU or a national trade association
EURATEX - European Apparel and textile Organisation	BE - Belgium	An EU or a national trade association
Euro Info Centre Stuttgart / Handwerk International	DE - Germany	A Member State or a public or semi-public authority
Eurocare - www.eurocare.org - European Alcohol Policy Alliance	BE - Belgium	A civil society organisation
EUROCHAMBRES	BE - Belgium	An EU or a national trade association
EuroCommerce	BE - Belgium	An EU or a national trade association
EUROFER - European Confederation of Iron and Steel Industries	BE - Belgium	An EU or a national trade association
Eurometaux	BE - Belgium	An EU or a national trade association
European Community Shipowners' Associations (ECSA)	BE - Belgium	An EU or a national trade association
European Federation of Pharmaceutical Industries and Associations (EFPIA)	BE - Belgium	An EU or a national trade association
EUROPEAN INTERNATIONAL CONTRACTORS e.V. (EIC)	DE - Germany	An EU or a national trade association
EUROPEAN SERVICES FORUM (ESF)	BE - Belgium	An EU or a national trade association
EXPORTERS' ASSOCIATION OF NORTHERN GREECE	EL - Greece	An association of SMEs
F.I.T- Flanders Investment and Trade	BE - Belgium	A Member State or a public or semi-public authority
Fatokem Ltd.	BG - Bulgaria	An EU Small or Medium sized Enterprise (SME)
Fédération Générale du Travail de Belgique	BE - Belgium	A civil society organisation
Federation Industries Avicoles	FR - France	An EU or a national trade association
Federation of European Sporting Goods Industry (FESI)	BE - Belgium	An EU or a national trade association
Finnish Forest Industries Federation	FI - Finland	An EU or a national trade association
Finpro, The Finnish National Internationalisation Agency	FI - Finland	A Member State or a public or semi-public authority
Food and Drink Federation	UK - United Kingdom	An EU or a national trade association
Freshfel Europe- European Fresh Produce Association	BE - Belgium	An EU or a national trade association
Governance asbl	BE - Belgium	Other contributor
GSV (Belgian steel federation)	BE - Belgium	An EU or a national trade association
ICEX –Instituto Español de Comercio Exterior.	ES - Spain	A Member State or a public or semi-public authority
IMPALA - Independent Music Companies Association	BE - Belgium	An association of SMEs

Name	Location	Type
International Road Transport Union (IRU)	BE - Belgium	A civil society organisation
IOGT-NTO	SE - Sweden	A civil society organisation
Kommerskollegium	SE - Sweden	A Member State or a public or semi-public authority
Laffineur Law Firm	BE - Belgium	Other contributor
Latvian Investment and Development Agency	LV - Latvia	A Member State or a public or semi-public authority
MEDEF - Mouvement des Entreprises de France	FR - France	An EU or a national trade association
Représentation Permanente de la France	FR - France	A Member State or a public or semi-public authority
Ministerul Economiei Si Comertului	RO - Romania	A Member State or a public or semi-public authority
Ministry for Foreign Affairs of Finland	FI - Finland	A Member State or a public or semi-public authority
Ministry of Commerce, Industry and Tourism	CY - Cyprus	A Member State or a public or semi-public authority
Ministry of Economy and Finance	EL - Greece	A Member State or a public or semi-public authority
Ministry of Economy and Transport	HU - Hungary	A Member State or a public or semi-public authority
Ministry of Foreign Affairs	LT - Lithuania	A Member State or a public or semi-public authority
Ministry of Foreign Affairs	SE - Sweden	A Member State or a public or semi-public authority
Ministry of Economy	SI - Slovenia	A Member State or a public or semi-public authority
MOET HENNESSY	FR - France	A larger European company
Österreich (Bundesministerium für Wirtschaft und Arbeit, BMWA)	AT - Austria	A Member State or a public or semi-public authority
Polish Confederation of Private Employers LEWIATAN	PL - Poland	An association of SMEs
Polish Federation of Apparel & textiles	PL - Poland	An association of SMEs
Royal Philips Electronics	NL - Netherlands	A larger European company
Embassy of Spain- Spanish Commercial Office in Riyadh	ES - Spain	A Member State or a public or semi-public authority
Stockholm Chamber of Commerce	SE - Sweden	An EU or a national trade association
TERREMERSE SOC.COOP.	IT - Italy	A larger European company
The Danish Government	DK - Denmark	A Member State or a public or semi-public authority
The European Chamber of Commerce in Taipei (ECCT)	BE - Belgium	An EU or a national trade association
The Scotch Whisky Association	UK - United Kingdom	An EU or a national trade association
UK Film Council	UK - United Kingdom	A Member State or a public or semi-public authority
UNICE, Confederation of European Business	BE - Belgium	An EU or a national trade association
UECBV- Union Européenne du Commerce du Bétail et de la Viande	FR - France	An EU or a national trade association
VDMA - Verband Deutscher Maschinen- und Anlagenbau	DE - Germany	An EU or a national trade association
Voka - Chamber of Commerce and Industry Antwerp-Waasland, Euro Info centre BE002 Antwerp	BE - Belgium	An EU or a national trade association