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EBF Template for Answers: Call for feedback to stakeholders on the feasibility assessment for a potential EU referral scheme

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General Remarks

As the representative of the private and universal banking sector in Europe, and in the context of financing growth, the EBF has consistently supported the following **goals**:

- **SMEs of all sizes and types** to receive the funding they require in order to provide employment and thrive in Europe;
- **High-growth SMEs**, which are a small sub-set of SMEs but are critical for innovation and competitiveness, to have access to a range of financing options, including risk capital through capital markets.

It is in this vein that we have led the following **collective actions** in the last years:

- **High-level Principles for Feedback to SMEs** whose loan applications have been denied (linked with the CMU 2015 Action Plan); and
- **Markets4Europe campaign**, which explicitly sought to promote the structural reforms needed to deepen and integrate capital markets, among others by addressing the access of smaller companies to capital markets through reforms on the supply and demand sides.
- **Financial education**, in close cooperation with our member associations and amplifying the efforts of the individual banks, engaged in activities not only to raise awareness but to build the capacity of individuals and companies in terms of knowledge of financing options.

Therefore, we are evaluating the current feasibility study for a potential EU referral scheme in the context of how we see the **problem** and which **solutions** we think are best.

As will be explained in further detail in this feedback statement, we see the **current environment and challenges** as follows:

- Banks we represent are intrinsically and commercially motivated to **treat every application with care**, with the natural objective of granting the application on the best possible terms and conditions, subject to their risk assessment and the match between the needs of the company and the risk profile of the bank.

- **High-level Principles for Feedback to SMEs**, which has been in force since 2017 and which we as the EBF have monitored closely and reported on in a transparent manner with our partners, has been implemented as intended, therefore promoting the broader uptake of an additional discipline across the EU to provide an adequate feedback to the potential clients whose applications cannot be granted in full. This process has also led to deepening a constructive dialogue between the EBF and the SME sector, at both national and European levels. It was in this context that SMEUnited and the EBF have issued a joint statement on COVID last year and continue their dialogue since.
- With the spread of **innovation in the banking sector and the proliferation of financing options**, companies enjoy a broader set of options to fund their needs. With respect to fintech solutions, we have consistently advocated for a level playing field in terms of regulatory treatment, both for competition and for investor protection.
- While the **financial literacy of both retail and SME corporate clients** needs to increase, banks are among the most active promoters of financial literacy, both in terms of campaigns to raise awareness and in terms of training and networking services for their clients. In recent years, European banks have increasingly approached financial literacy as part of financial health/well-being for their clients, and have put in place various measures to ensure that potential and current clients have access to the information they need to make sound financial decisions for themselves and their companies, including the consideration of options to loans.
- In addition to their basic processes in relation to a loan application, banks and others also provide **financial advice** for different types of clients, which is a critical element of accessing capital markets, managing risks and reaching long-term growth. This service is well regulated in all its policy aspects (competition, suitability, conflicts of interest) and is subject to competition among different types of providers. Along with services provided by accountants and auditors, financial advisors form a critical **ecosystem** for companies that require help in accessing financing options.

Taking into consideration this environment, we see the **following needs** for the future:

- The **CMU Action Plan** must be implemented in such a way that key obstacles to supply and demand are removed (with a special emphasis on far-reaching reforms to unite the investor base e.g. due to insolvency or duplicative withholding tax and to lower the cost of access for companies e.g. through listing rules). We especially welcome the financial education framework that is being developed with the OECD as part of the CMU and believe that it

will make a big difference both in terms of investors and borrowers. Several other parts of the Action Plan (eg European single access point, ESAP) will also help integrate the market.

- **Public authorities** could provide a more comprehensive and integrated overview of the types of financing options available to companies. This would increase the level of knowledge and trust of companies seeking finance.
- **Banks should continue offering**, on an individual and sectoral basis and subject to free competition, training services and campaigns to raise the general level of awareness of the full range of options available to applicants.

In this environment, **we do not see the proposed referral scheme as either necessary or helpful**. We recognise that the scheme is currently defined in an open way, with some flexibility of design. However, we believe that any such scheme would involve the following characteristics, which we find problematic:

- **Converting the financial advice service into an unpaid, uncontracted service for all borrowers**: If a lender refers a rejected applicant to another bank/source in a 'blanket' way (i.e. without matching the profile of the borrower's application with selected alternative sources), this would add little value over an internet search that could be done by the borrower. If this is to be done in a tailored way, looking at the specific applicant in detail and the alternative sources, then it would amount to at least a partial financial advice for the borrower.
- **Transferring the liability and reputational risks from the supervisors to the lenders**: Whether it is done in a blanket or tailored way, the referral would create a liability risk for the bank in case of problems incurred by the applicant that encounters problems (eg because they could claim the referral missed a valuable option or because the referred option ended up being unsuitable to their needs). Moreover, even in a system of blanket referral, any mistakes in the list of licensed sources of financing that are due to supervisors' systems would be the liability of the bank, thereby creating risks for the bank and amplifying potential mistakes.
- **Violating the preferences of many SMEs to keep control over their confidential business information and potential lenders**: Many SMEs whose loan applications have been rejected by a bank would not want information about this rejection and their confidential business information to be shared with third parties. Based on the feedback received from banks on the reasons for rejection, SMEs are in many cases encouraged to postpone and/or adjust their investment plans.

The overall result would be:

- **Higher costs for all clients, including those for whom future applications are granted:** The operational changes that would have to be done on a one-off and regular basis ultimately would have to be passed on to all clients, thereby raising financing costs for companies.
- **Loss of a high-quality, tailored financial advice service for companies:** The blurring of lines between a tailored service contracted on a commercial basis and a general service required by law would erase over time the distinct usefulness of the commercial service and would lead to its disappearance over time. Exactly at a time when such professional services can be so useful to digitalising or digital-born companies, financial advice and related services would be replaced by a web of referrals among commercial sources that is devoid of substance.
- **More confusion and lower literacy for the borrowers:** Whether done in a tailored or automatic, blanket way, the referral would have the impact of over-simplifying the creditworthiness assessment and the matching of needs and capital offered and would lead clients to rely on a simplistic, mechanistic approach, instead of assuming the responsibility for their own assessment and literacy. This would clash with the goal of increasing the level of knowledge and responsibility of companies in the context of a digitalizing economy.

That is why we recommend that, if the ideas behind the referral scheme – notably the desire to make companies more aware of financing options that match their needs – are to be implemented, the following changes should be made in the proposal under consideration:

- **Public authorities could consider providing more integrated information regarding licensed financing options (in broad categories) across the EU in one place, e.g. on the webpage of the EC, EBA and ESMA, with links to national webpages;**
- **All regulated providers of finance could be expected to inform those applicants whose finance requests have been declined and who expressly ask for alternative sources of finance about the availability of this information in a way that that does not cause any operational challenges, lead to fraud or cause reputational issues, or contradict existing laws (such as AML);**
- **Such a system should not be conceived as a referral scheme but rather as one of making clients aware of a central source of information provided by public authorities. We recommend that public authorities further assess whether such a central source makes sense and whether it has a value added.**

Criticality of the problem

Question 1.

To what extent do you agree the elements below represent obstacles faced by SMEs when accessing bank loans in all EU-27 Member States?

We respond to the question based on banks' experience with the process in their role as lenders and also based on the information gathered in the SAFE Survey.

	1 (fully disagree)	2 (rather disagree)	3 (neutral)	4 (rather agree)	5 (fully agree)	Don't know -No opinion -Not applicable
It is difficult to provide all the necessary information requested by the bank	1					
It is not possible to file the same request at several banks simultaneously with the same information	1					
It is a very long and administratively burdensome process	1					

Lack of eligible collateral		2				
Rejection of application		2				
Limited amount granted		2				
Too high interest rates	1					
Inadequate business plans				4		
Other				4		

Please specify what other obstacle(s) SMEs face when accessing bank loans in all EU-27 Member States:

The ECB Bank Lending Survey over the last few years has drawn a consistent picture, pointing to financing not being one of the main problems faced by SMEs, with loan demand being met to a large extent.

According to the latest EC & ECB SAFE surveys, in the middle of the coronavirus (COVID-19) pandemic, euro area SMEs reported that difficulty in finding customers was the dominant concern for their business activity, while access to finance was considered to be among the least important obstacles. In fact, SMEs reported, on balance, that bank interest rates had declined. Almost no enterprise (SME or large) considered the cost of a loan to be too high.

The proportion of loan applications rejection for SMEs and large enterprises is low (2% and 1%), as well as the percentage of SMEs and large companies that reported receiving only a limited part of the loan amount requested (2.3% for SMEs and 2.4% for large firms).

However, the turnover and profits of euro area SMEs deteriorated, reflecting the sharp fall in economic activity.

As mentioned in the ECB Bank Lending Survey, banks consider risk perceptions related to the deterioration in the general economic and the firm-specific situation as the main factor contributing to the tightening of credit standards. This reflects banks' continued concerns around the economic recovery and borrowers' creditworthiness as the stringency of coronavirus-related restrictions increased again in most euro area countries.

Currently, the critical point in assessing a bank loan application is not lack of information or insufficient knowledge on the part of the entrepreneur. The critical point is credit risk.

When business plans that are viable in terms of credit risk are still rejected, this is usually due to application requirements not being met (lack of financial data or financial planning)

Moreover, the new EU rules on the so-called “definition of default” and “calendar provisioning” incentivise more restrictive standards at credit origination.

Of course, banks help SMEs by providing all the necessary information. Banks also assist SMEs by providing them with the tools (for instance a standard form for calculating liquidity needs or by e-books and manuals) to ease the application process.

Financial advisors and accountants should also play an important role in further helping and guiding SMEs to the relevant sources of finance, whether that is banks or Alternative Lending Providers.

Please explain your answer to question 1 for all EU-27 Member States:

The most relevant data necessary - and normally required for a credit application - are:

- standard financial statements, such as balance sheet and income statement,
- annual accounts,
- an overview of transaction data
- and an indication of liquidity needs,

Given that these data contain all the information usually required for granting access to bank loans, companies will be able to use that information for credit applications with multiple banks.

Moreover, the application of the EBA Guidelines on Loan Origination and Monitoring will also require further specific items that banks consider when collecting and using information to assess a borrower’s creditworthiness.

SMEs that are in search of financing are usually able to find the relevant sources of finance that match their needs. Some companies may need help from their financial advisor or accountant. In the end, businesses tend to find their way in the financial landscape.

SMEs will be able to find general information about the requirements for a credit application with banks or with the support of websites run by chambers of commerce or government agencies.

Question 1.1 To what extent do you agree that the above obstacles could be addressed by a referral scheme for SMEs?

	1 (fully disagree)	2 (rather disagree)	3 (neutral)	4 (rather agree)	5 (fully agree)	Don't know -No opinion - Notapplicable
It is difficult to provide all the necessary information requested by the bank	1					
It is not possible to file the same request at several banks simultaneously with the same information	1					
It is a very long and administratively burdensome process	1					
Lack of eligible collateral	1					
Rejection of application	1					

Limited amount granted	1					
Too high interest rates	1					
Inadequate business plans	1					
Other						

Please specify what you mean by 'other' in your answer to question 1.1:

Please explain your answer to question 1.1:

We do not see the proposed referral scheme as necessary or helpful. We recognise that the scheme is currently defined in an open way, with some flexibility of design. However, we believe that any such scheme would involve the following characteristics, which we oppose, for the following reasons:

- **Converting the financial advice service into an unpaid, uncontracted service for all borrowers:** If a lender refers a rejected applicant to another bank/source in a 'blanket' way (ie without matching the profile of the borrower's application with selected alternative sources), this would add little value over an internet search that could be done by the borrower. If this is to be done in a tailored way, looking at the specific applicant in detail and the alternative sources, then it would amount to at least a partial financial advice for the borrower.
- **Transferring the liability and reputational risks from the supervisors to the lenders:** Whether it is done in a blanket or tailored way, the referral would create a liability risk for the bank in case of problems incurred by the applicant that encounters problems (eg because they could claim the referral missed a valuable option or because the referred option ended up being unsuitable to their needs). Moreover, even in a system of blanket referral, any mistakes in the list of licensed sources of financing that are due to supervisors' systems would be the liability of the bank, thereby creating risks for the bank and amplifying potential mistakes.
- **Violating the preferences of many SMEs to keep control over their confidential business information and potential lenders:** Many SMEs whose loan applications have been rejected by a bank would not want information about this rejection and their confidential business information to be shared with third parties. Based on the feedback received

from banks on the reasons for rejection, SMEs are in many cases encouraged to postpone and/or adjust their investment plans.

A referral scheme as currently outlined would not only cause these problems of distortion, but would also fail to meet the needs of SMEs.

While a small number of credit applications are declined, numbers differ depending on the type of SME being financed (Traditional vs Innovative/Born digital/Startup, etc.). In many cases the challenges are linked to the company's profile.

The main constraints banks face when financing innovative companies, especially born-digital one, are as follows:

- high-risk profile
- lack of traditional collateral
- complexity of business models.

These difficulties, if grounded in objective facts, will remain no matter where the applicant goes; if they are not grounded in such facts (ie if the first lender has made a mistake), any other lender in the market will reach a different outcome.

When such problems objectively exist, they can be overcome in different ways by different banks or different types of financing sources, in a well-functioning, competitive market and subject to regulations and standards. The compliance and risk procedures in the credit concession process are largely regulatory obligations that yield similar outcomes with similar input. However, naturally it is not possible to say that a company that is declined by one bank would be declined by all others. One bank might reach a different assessment in terms of the creditworthiness of the company or the cashflow of the project, within sectoral rules and standards applied.

What is more likely is that companies that do not have a traditional cashflow projection may not be suitable for a standard bank loan but may find financing through some other type of financier on the funding escalator (eg VC, crowdfunding, equity/mezzanine kind of finance). Indeed, for a number of reasons, capital markets may not be a good option for the company either. Each case will be different and require a detailed analysis which only the company and its professional advisors can do.

In all of these different cases – regular SME or digital-born, traditional or innovative - it will be useful for the SME to be aware of the full range of options. However, the best to do this is through **general information being made available through the public authorities (or supervisors') websites** rather than the referral to be done by the bank that refuses the application.

Question 2. To what extent would you agree that SMEs face difficulties to access non-bank, lending-based financing in your Member State / in the Member States you are active in?

To what extent do you agree the elements below represent obstacles faced by SMEs when accessing non-bank, lending-based financing in all EU-27 Member States?

	1 (fully disagree)	2 (rather disagree)	3 (neutral)	4 (rather agree)	5 (fully agree)	Don't know -No opinion - Not applicable
Lack of information and awareness about non-bank, lending-based providers;		2				
Interest rates;			3			
High search costs to find information about the finance providers;		2				
Other						

Please specify what other obstacle(s) SMEs face when accessing non-bank, lending-based financing in all EU-27 Member States:

Non-bank financiers are relatively young to the market. It is not always clear what their offering to a business looks like. Such providers can be found very easily online – however, that does not mean they represent a good alternative source of financing

for SMEs, and it very much depends on the needs and priorities of the company. A through case-by-case analysis would need to be done for it to have any value at all, which is akin to financial advice.

Please explain your answer to question 2 for all EU-27 Member States:

There are many differences among Member States as to the depth, maturity and financing conditions in the non-bank lending-based financing market, as well as the awareness and needs of the SME clients. Some are best suited for short term funding, while others are tailored for specific kinds of risk.

It is important for SMEs to trust alternative platforms. A lot of information about alternative sources of non-bank lending are easily accessible on the internet, but SMEs could benefit from having this available in a consolidate way through a public source such as EBA or ESMA.

Question 2.1 To what extent do you agree that the above obstacles could be addressed by a referral scheme for SMEs?

	1 (fully disagree)	2 (rather disagree)	3 (neutral)	4 (rather agree)	5 (fully agree)	Don't know - No opinion - Not applicable
Lack of information and awareness about non-bank, lending-based providers		2				
Interest rates:	1					
High search costs to find information about the finance providers	1					
Other						

Please specify what you mean by 'other' in your answer to question 2.1:

Please explain your answer to question 2.1:

For the reasons we have given above, we do support SMEs having more information about alternative providers of finance but not through a referral scheme.

We do not believe the referral scheme as proposed would meet the needs of SMEs.

Broad financial literacy programs as well as a central source of information on the types of financing available would be helpful.

In addition, proper regulation of alternative sources of financing would be critical to building SMEs' trust in other types of finance.

Finally, the complexity, changing nature and variety of offerings of non-bank finance make it very difficult for banks to follow the latest developments and conditions (from interest rates to consumer protection guarantees) in this market. Furthermore, the needs of bank SME clients are also very diverse which adds to the difficulty of establishing an effective referral mechanism through the banking channel.

So, as mentioned previously, we consider a central source of information to which all finance providers could make a reference to be a better solution to the problem at hand.

Question 3.

To what extent would you agree that SMEs face difficulties to access equity-based financing in all EU-27 Member States?

	1 (fully disagree)	2 (rather disagree)	3 (neutral)	4 (rather agree)	5 (fully agree)	Don't know - No opinion - Not applicable
Lack of information and awareness about equity-based providers			3			
High search costs to find information about equity-based providers	1					
Other						

Please specify what other obstacle(s) SMEs face when accessing equity-based financing in all EU-27 Member States:

Please explain your answer to question 3 for all EU-27 Member States:

Equity finance may be suited for a particular sub-set of SMEs as indicated in answer to question 1.1. For instance, the start-up looking for early stage or venture capital, or a business that is high growth and might benefit from private external capital (private investor) or private equity (PE). These kinds of businesses tend to find their way with the use of a **financial advisor** or within networks of **financial specialists** (financial controllers and CFOs) and they usually do not apply for bank lending (as

also reflected in the start-up study undertaken in the EC's Annual Report on European SMEs 2017/2018, p. 51). The overwhelming majority of such businesses would not benefit from a referral to such an equity provider.

Although the majority of SMEs that are a better fit for equity finance rather than bank lending will have that knowledge from the start, it is inevitable that some bank loan applications will include business models or projects that are a better fit for equity markets. In such cases, one cannot expect the bank that has rejected the loan application to carry out a detailed analysis of the kind of financing that would be better suited. If the bank has an alternative financing unit, it may recommend that.

In any event, as required by the High-level Principles code, banks will give a general reason for why the application was rejected. With this information, and general information made available in a central place, such companies would be able to find their way to alternative sources. If they need further, tailored advice, they will go to a financial advisor.

Question 3.1 To what extent do you agree that the above obstacles could be addressed by a referral scheme for SMEs?

	1 (fully disagree)	2 (rather disagree)	3 (neutral)	4 (rather agree)	5 (fully agree)	Don't know - No opinion - Not applicable
Lack of information and awareness about non-bank, lending-based providers		2				
Interest rates	1					
High search costs to find information about the finance providers	1					
Other						

Please specify what you mean by 'other' in your answer to question 3.1:

Please explain your answer to question 3.1:

We consider a referral would not be an effective mechanism for SMEs that face difficulties in accessing equity-based financing obstacles. Please, see Answer to Question 3 for further details.

In addition, the current era of low inflation and low interest rates – which is unlikely to change in the near term in light of the pandemic – leads us to consider that the level of interest rates is not a significant obstacle.

Finally, we would like to remark that it likely that a referral scheme as conceived could eventually refer SME customers to more expensive or less regulated sources of funding.

Question 4. Do you think that the COVID-19 pandemic has affected the usefulness and importance of establishing a bank referral scheme?

1 - Fully disagree	1
2 - Rather disagree	
3 - Neutral	
4 - Rather agree	
5 - Fully agree	
Don't know / no opinion / not relevant	

Please explain your answer to question 4:

In the recovery phase, financing sources that allow recapitalization will be important. Moreover, the crisis has also accelerated the digitalization of the economy, therefore the rate of digital-born or digitalizing companies could increase.

However, these are ways in which the crisis has increased the need for companies to access alternative sources of financing and have nothing to do with the specific scheme envisaged. For reasons we have explained above, such a scheme would make lending more expensive and eventually undermine the ecosystem of providers of professional services that are needed to enable companies to access capital markets. Therefore, on the contrary, in our view the COVID crisis has increased the reason to be sceptical of a referral scheme.

We would also like to take this opportunity to outline the ways in which the European banking sector has supported the public support measures to the EU Economy and the actions to accelerate the recovery:

- Continued coordination among the lenders and the public authorities both at national and European levels is crucial for ensuring a successful recovery.

- The Best Practices process initiated by the European Commission last year is a valuable part of this effort; complementing the open dialogue existing between banks, businesses and consumers.
- Banks have provided financing to European businesses and consumers throughout the pandemic and are continuing to do so as Europe embarks on the path to recovery.
- New loans have increased considerably in many jurisdictions (this refers to new loans for enterprises, but not for households). The refusal rate for new loans is close to previous years' average - meaning that banks have maintained a steady level of lending despite the circumstances.

It is critical to ensure that long-term projects such as the CMU, Banking Union as well as the Digital and Green Transition continue without losing pace to solidify the future recovery and make Europe more resilient. The EBF is fully engaged in these projects, notably on sustainable finance, the CMU and digitalisation. More recently, we are engaging in discussions with Accountants and SMEs in order to call on our members to hold national discussions on the possible high level key performance criteria (KPIs) to assess a SME's business viability in the post-COVID environment.

The EU must play an active role in financial education to help develop the financial resilience and skills of European citizens. The EBF has long championed financial education as a way to strengthen confidence, safety and knowledge in accessing finance, and we will continue to be engaged in promoting and coordinating initiatives across the EU.

We consider that although the banking sector will continue to be critical in the post-pandemic recovery process, sound funding structures, combining traditional and market-based financing, will be the lifeblood that sustains the recovery and future growth over the long term.

Clearly, alternatives to bank financing need to be developed to contribute to the economic recovery and SMEs need to become aware of these alternatives, yet credit risk, and not information asymmetry, was the main issue facing companies during COVID. Looking more into the future – beyond COVID recovery – the CMU will help address both the supply and demand sides of SMEs' access to capital markets. Amid all the actions for which there is a clear justification, we find that the current referral scheme as envisaged would be both counter-productive for the reasons we have outlined and in the end a distraction from the other, more urgent problems, such as the reforms to integrate the investor base or to ease the listing requirements for issuers.

Question 5. Do you agree or disagree that a referral scheme would - alone or in a combination with other measures - improve access to financing by SMEs?

1 - Fully disagree	1
2 - Rather disagree	
3 - Neutral	
4 - Rather agree	
5 - Fully agree	
Don't know / no opinion / not relevant	

Please explain your answer to question 5:

The EU must invest in financial education through public institutions/organizations. As part of such a campaign, SMEs do need an adequate source of neutral information on the types of finance that might be applicable to them and the organisations that can assist them in obtaining suitable finance options. However, banks are not in the position to carry out this activity, except in generic terms and, therefore, without any real advantage for SMEs or for any of the referral scheme participants. It would be much more useful to strengthen the ecosystem of actors that are involved in helping SMEs to understand their own needs and the offering of finance in the market. Neither of these points can be obtained through the envisaged referral scheme.

As mentioned above, the obstacles to financing, especially for start-up or innovative companies, often stem from a lack of information and financial history.

On the other hand, data-driven innovation has shown that the relevant data for the provision of financial services are no longer only those of a financial nature. Thus, for example, when non-financial data is included in the analysis of financial institutions, the results are richer and increase the potential to offer products and services in a more tailored way while also allowing new segments of the population to be served and companies and new business models to be financed.

We believe that the authorities should promote a regulatory framework for cross-sector data sharing - and not just for the financial sector - to allow both individuals and companies to share their data whenever and with whoever they want, securely and in real time. For companies, this could mean access to new sources of data from their digital iterations, such as inventories, customer ratings, etc., which could greatly assist in risk assessment and therefore financing.

In this sense, the future European Single Access Point (ESAP) and the future Financial Data Space could be a catalyst for the exchange of SME information, when SMEs are unable to obtain financing, between different financial service providers (not only banks). This would be much more efficient than a referral system.

But even so, we believe that regulatory efforts on data access and sharing should pursue a cross-sectoral (and not just financial) approach to capture the value of data of various kinds and thus improve the ability to finance companies, especially the most innovative ones.

Scope

Question 6. Which of the providers below do you think should be included in the scope of potential providers of financing and platforms to which to refer SMEs as part of the scheme?

Platforms are understood as intermediaries connecting finance providers with finance seekers. These may include crowdfunding platforms, matchmaking platforms and some supply chain finance platforms for instance.

a) Credit providers (please select as many answers as you like)

Credit institutions under CRR/CRD.	
AIFMs that manage loan originating AIFs	
Lending-based crowdfunding platforms providing lending under the ECSP	
Credit providers authorised under national legislation	
Credit providers that are currently not regulated	
Other credit providers	
None	X

Please specify what are the others you refer to:

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. If an information page were to be set up as we propose, then it should cover all regulated entities.

b) Equity finance providers (please select as many answers as you like)

Investment-based crowdfunding platforms providing equity investment under ECSP	
Managers of venture capital funds	

Business angels / private investor syndicates	
Managers of private equity funds	
Other equity finance providers	

Please specify what are the others you refer to:

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. If an information page were to be set up as we propose, then it should cover all regulated entities.

The lender which has rejected the loan should, where appropriate, inform the SME of the existence of such a page.

c) Supply chain finance and working capital providers (please select as many answers as you like)

Banks offering supply chain finance and working capital solutions	
Other platforms offering supply chain finance and working capital solutions	

Please specify what are the others you refer to:

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. If an information page were to be set up as we propose, then it should cover all regulated entities.

d) Others (please select as many answers as you like)

Insurance companies	
Other institutional investors	
Matchmaking platforms	
Advisory centres	

Please specify what are the other institutional investors you refer to:

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. If an information page were to be set up as we propose, then it should cover all regulated entities. It should also include Mutual Guarantee Funds.

Please specify what are the matchmaking platforms you refer to:

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. If an information page were to be set up as we propose, then it should cover all regulated entities. It should also include Crowdfunding platforms

Please specify what are the advisory centres you refer to:

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. If an information page were to be set up as we propose, then it should cover all regulated entities.

Question 7. Are there any other providers of financing or platforms that you believe should be included but have not been mentioned above?

Yes	
No	
Don't know / no opinion / <u>not relevant</u>	X

Please specify what other providers of financing or platforms not been mentioned should be included:

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. If an information page were to be set up as we propose, then it should cover all regulated entities.

Question 8. A number of EU funded programmes focus on SMEs. Should the new referral scheme provide information on the national points of contact for accessing these EU programmes?

Yes	X
No	
Don't know / no opinion / not relevant	

Broadly speaking national government bodies will have a point of information where SMEs can find this kind of information. A scheme can refer to these sources.

We believe that it would be a good idea to have all relevant EU programmes coordinate among themselves in a centralised manner, providing more information to all involved: EASME/EISMEA, EIB (EIAH, FinSmart), etc.

Question 9. What information should be sent by the referring entity to the receiving entities?

All the information in the application	
Only part of the information in the application	
Don't know / no opinion / not relevant	X

Please specify which pieces of information should be provided to the receiving entities:

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. If an information page were to be set up as we propose, then it should cover all regulated entities.

Question 10. Should the information be provided in a standardised format?

Yes	
No	
Don't know / no opinion / not relevant	X

Please explain your answer to question 10:

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. If an information page were to be set up as we propose, then it should cover all regulated entities and should be centralised and standardised.

Question 11. Should the scheme include only EU or also non-EU SMEs?

EU SMEs only	X
EU and non-EU SMEs	
Don't know / no opinion / not relevant	

Please explain your answer to question 11:

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. If an information page were to be set up as we propose, then it should cover all regulated entities and should cover EU SMEs only.

Question 12. What criteria should be looked at in designating receiving entities (finance providers and platforms, possibly banks) that are in the scope of the scheme?

Please select as many answers as you like:

Relevance to SME funding	
Time in business	
Regulated provider	
Volume of financing facilitated/provided to SMEs	
Other	X

Please specify to what other criterion/a it should be looked in designating receiving entities that are in the scope of the scheme:
Trustworthiness.

In addition, we would like to remark that The list of entities should made available by Supervisors/Public Authorities

Question 12.1 How would you define the criterion/a you selected in question 12?

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. Therefore the criteria in the question is irrelevant.

Question 13. What criteria should be looked at in designating referring entities?

Please select as many answers as you like:

Size	
Share of SME funding activities	
Other	

Please specify at what other criterion/a it should be looked in designating referring entities:

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. Therefore the criteria in the question is irrelevant.

Question 13.1 How would you define the criterion/a you selected in question 13?

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. Therefore the criteria in the question is irrelevant.

Governance

Question 14. Should the designation of referring entities and of receiving entities be done at EU level or at national level?

At EU level	
At national level	
Don't know / no opinion / <u>not relevant</u>	X

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. The central data system we propose should be at the EU level.

Question 15. Which institution should designate the receiving entities and the referring entities?

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. The central data system we propose does not require designating any such entities.

Please select as many answers as you like:

National promotional bank	
National Treasury	
National supervisors	
Other national institution	
European Securities and Markets Authority	

European Insurance and Occupational Pensions Authority	
European Banking Authority	
European Investment Bank Group	
Other EU institution	
Other	

Question 15.1 Please specify which institution should designate the receiving entities and the referring entities:

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. The central data system we propose does not require designating any such entities.

Question 16. Should designated referring entities refer rejected SMEs to domestic finance providers and platforms or also to providers in other Member States within the single market?

Only to domestic finance providers and platforms	
Both to domestic finance providers/platforms and across borders within the single market	
Don't know / no opinion / <u>not relevant</u>	X

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. The central data system we propose would provide information across the EU.

Question 16.2 Would you be in favour of a special cooperation arrangement (notification, sharing of information) between bodies designating providers and platforms in Member States?

Yes	
No	
Don't know / no opinion / <u>not relevant</u>	X

Question 16.3 Please explain your answer to question 16.2:

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. The central data system we propose does not require any heavy corporation; it should only involve information from the Member States being collated in one place and being updated.

Question 17. Do you think that the referral requirement should apply to all participants of the scheme when they reject an SME funding application: i.e. not only from banks to finance providers and platforms but also from finance providers and platforms to banks, and amongst banks and finance providers and platforms?

a) From providers and platforms to banks:

Yes	
No	
Don't know / no opinion / not relevant	X

Please explain your answer to question 17 a):

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above.

b) Amongst banks:

Yes	
No	
Don't know / no opinion / not relevant	X

Please explain your answer to question 17 b):

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above.

c) Amongst finance providers and platforms:

Yes	
No	
Don't know / no opinion / not relevant	X

Please explain your answer to question 17 c):

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above.

Regulation and supervision

Question 18. Would it be problematic if the scheme were open to both regulated and non-regulated finance providers and platforms?

Yes	
No	
Don't know / no opinion / not relevant	X

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above.

Which challenge(s) would you expect?

Please select as many answers as you like:

Level playing field issue between regulated and non-regulated entities	
--	--

Risk of fraud and scams	
Other	

Please specify what are the other challenge(s) you would expect:

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above.

Question 19. Do you consider that all designated finance providers and platforms should be regulated (under EU or national financial regulation)?

Yes	X
No	
Don't know / no opinion / not relevant	

Yes we do, and we believe that SMEs could benefit from seeing all regulated entities in one place.

Question 19.1 In light of the regulatory challenges identified above, should the existing regulatory framework be maintained or changed?

a) Credit providers

	Regulatory framework should be maintained	Regulatory framework should be changed	Regulatory framework should be changed Don't know -No opinion -Notapplicable
Credit institutions under CRR/CRD			
AIFMs that manage loan originating AIFs			
Lending-based crowdfunding platforms providing lending under the ECSP			
Credit providers authorised under			

national legislation			
Credit providers that are currently not regulated			
Other credit providers			

Please specify to what others you refer to above:

As we oppose the referral scheme as proposed, we prefer not to answer this question in detail. As a general principle, entities doing the same business should all be regulated in the same way.

b) Equity finance providers

	Regulatory framework should be maintained	Regulatory framework should be changed	Regulatory framework should be changed Don't know -No opinion -Notapplicable
Investment-based crowdfunding platforms providing equity investment under ECSP			
Managers of venture capital funds			

Business angels / private investor syndicates			
Managers of private equity funds			
Other equity finance providers			

Please specify to what others you refer to above:

As we oppose the referral scheme as proposed, we prefer not to answer this question in detail. As a general principle, entities doing the same business should all be regulated in the same way.

c) Supply chain finance and working capital providers

	Regulatory framework should be maintained	Regulatory framework should be changed	Regulatory framework should be changed Don't know -No opinion -Notapplicable
Banks offering supply chain finance and working capital solutions			
Other platforms offering supply chain finance and working capital solutions			

Please specify to what others you refer to above:

As we oppose the referral scheme as proposed, we prefer not to answer this question in detail. As a general principle, entities doing the same business should all be regulated in the same way.

d) Others

	Regulatory framework should be maintained	Regulatory framework should be changed	Regulatory framework should be changed Don't know -No opinion -Notapplicable
Insurance companies			
Other institutional investors			
Matchmaking platforms			
Advisory centres			
Other			

Please specify to what other institutional investors, matchmaking platforms, advisory centres or else you refer in your answer to question 19.1 d):

As we oppose the referral scheme as proposed, we prefer not to answer this question in detail. As a general principle, entities doing the same business should all be regulated in the same way.

Question 19.2 Please explain how the regulatory framework should be changed:

Question 20. In the same vein, should the existing supervisory frameworks be maintained or changed to ensure a level-playing field and avoid regulatory arbitrage?

a) Credit providers

	Regulatory framework should be maintained	Regulatory framework should be changed	Regulatory framework should be changed Don't know -No opinion -Notapplicable
Credit institutions under CRR/CRD			
AIFMs that manage loan originating AIFs			
Lending-based crowdfunding platforms providing lending under the ECSP			
Credit providers authorised under national legislation			
Other credit providers			

Please specify to what others you refer to above:

As we oppose the referral scheme as proposed, we prefer not to answer this question in detail. As a general principle, entities doing the same business should all be regulated in the same way.

b) Equity finance providers

	Regulatory framework should be maintained	Regulatory framework should be changed	Regulatory framework should be changed Don't know -No opinion -Notapplicable
Investment-based crowdfunding platforms providing equity investment under ECSP			
Managers of venture capital funds			
Business angels / private investor syndicates			
Managers of private equity funds			
Other equity finance providers			

Please specify to what others you refer to above:

As we oppose the referral scheme as proposed, we prefer not to answer this question in detail. As a general principle, entities doing the same business should all be regulated in the same way.

c) Supply chain finance and working capital providers

	Regulatory framework should be maintained	Regulatory framework should be changed	Regulatory framework should be changed Don't know -No opinion -Notapplicable

Banks offering supply chain finance and working capital solutions			
Other platforms offering supply chain finance and working capital solutions			

Please specify to what others you refer to above:

As we oppose the referral scheme as proposed, we prefer not to answer this question in detail. As a general principle, entities doing the same business should all be regulated in the same way.

d) Others

	Regulatory framework should be maintained	Regulatory framework should be changed	Regulatory framework should be changed Don't know -No opinion -Notapplicable
Insurance companies			
Other institutional investors			
Others			

Please specify to what other other institutional investors, matchmaking platforms, advisory centres or else you refer in your answer to question 20.1 d):

Question 20.2 Please explain how the regulatory framework should be changed:

As we oppose the referral scheme as proposed, we prefer not to answer this question in detail. As a general principle, entities doing the same business should all be regulated in the same way.

Question 21. Once finance providers and platforms (as receiving entities) have been designated by the relevant body, should their inclusion into the scope of the scheme as receiving entities be voluntary or mandatory?

Inclusion of designated finance providers and platforms into the scope of the scheme as receiving entities should be voluntary	
Inclusion of designated finance providers and platforms into the scope of the scheme as receiving entities should be mandatory	
Don't know / no opinion / <u>not relevant</u>	X

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above.

Question 21.1 Should all applying finance providers and platforms be able to enter the scheme as receiving entities provided they are regulated /supervised?

All applying providers and platforms should be able to enter the scheme as receiving entities provided they are regulated and supervised	
--	--

Not all applying provider and platforms should be able to enter the scheme as receiving entities, even if they are regulated and supervised. Some additional selection criteria should be considered (the ones explained in question 12)	
Don't know / no opinion / not relevant	X

Question 21.2 Please explain your answer to question 21 and 21.1:

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above.

Question 22. Should rejected SMEs be referred, after giving their consent, to the whole list of designated finance providers and platforms, even if not all might be relevant?

Yes	
No	
Don't know / no opinion / not relevant	X

Please specify on the basis of which criteria the SME should be redirected to some specific finance providers and platforms:

We recommend a centralised and public source of information to be made available to SMEs.

Question 22.1 Who should then decide on the providers and platforms that would be relevant?

The referring entity	
The rejected entity (the SME)	

The receiving entity	
A competent authority	X
A designating authority (if different from the competent authority)	
Other	
Don't know / no opinion / not relevant	

Please specify to what 'competent authority', 'designating authority' or 'other' you refer in your answer to question 22.2:

We believe the information should be run by public authorities.

Question 23. Assuming that the referred SME would provide consent prior to their application referral, in your view, would there be any potential liability risks for the referring entity (i.e. GDPR compliance, data privacy)?

Yes	
No	
Don't know / no opinion / not relevant	X

Please specify what liability risks there would be for the referring entity:

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above.

. In any case, the general liability of the bank should be excluded in principle according to what we have explained in question 27 (see answer 27, 5, 6 b9, and 9).

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above.

Question 24. In your view, would there be any risks of liability for the referrer regarding the subsequent success or failure of the application?

Yes	
No	
Don't know / no opinion / not relevant	X

Please specify what risks of liability there would be for the referrer:

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. As we have outlined above, one of the reasons is indeed liability.

Compliance costs

Question 25. What set-up and ongoing compliance costs do you expect arising from such referral scheme for the stakeholders below? Where possible, please base your answer on actual costs if there are existing similar schemes or provide estimates:

a) For referring entities (banks, other finance providers and finance platforms):

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. We believe it would be very costly both to set up and to maintain.

b) For receiving entities (banks, other finance providers and finance platforms):

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. We believe it would be very costly both to set up and to maintain.

Question 26. A referring entity within the scope of the referral scheme would have to refer each rejected applicant (SME) to other providers of finance and/or finance platforms.

In your view, what would be the associated costs for the referring entity for each of the following actions?

	Negligible	Medium	High	Don't know -No opinion -Notapplicable
Receiving consent from the rejected entity (SME) to refer their application to an alternative provider of finance				
Processing and formatting the information on the rejected entity (SME) into a suitable format for transfer				
Forwarding the relevant information to the alternative finance provider				

Question 26.1 What other elements could create costs for the referring entity?

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. We believe it would be very costly both to set up and to maintain.

Question 27. A receiving entity within the scope of the referral scheme would have to receive information pertaining to each rejected applicant (SME) being referred to them.

In your view, what would be the associated costs for the receiving entity for each of the following actions?

	Negligible	Medium	High	Don't know -No opinion -Notapplicable
Receiving the referral from the referring entity about the SME's application				
Processing and formatting the information on the rejected entity (SME) into a suitable format for further use				

Banks which are referring entities should not send any information to the receiving entities (see answer 9)

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. We believe it would be very costly both to set up and to maintain.

Question 27.1 What other elements could create costs for the receiving entity?

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. We believe it would be very costly both to set up and to maintain.

IT and data formats

Question 28. Could the referral scheme be automated, thus reducing variable costs?

Yes	
No	
Don't know / no opinion / not relevant	X

Question 28.1 What technological solutions could be utilised in order to lower potential costs for the referring entity?

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. We believe it would be very costly both to set up and to maintain.

Any process would have to be standardised at European level and only include a reference to a central website. This would allow banks to provide a level playing field of responses, avoid undue liabilities and to compete on fair terms.

Question 29. In order to improve the usability of the information, would you support the use of structured data formats, such as XHTML, iXBRL, XML, etc., allowing for machine readability of the underlying SME information?

Yes	
No	
Don't know / no opinion / not relevant	X

Question 29.1 Which of the following machine-readable formats would you find suitable? Please rate the following information based on how suitable they are according to you:

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. We believe it would be very costly both to set up and to maintain, irrespective of the format.

	1 (highest rate)	2	3	4	5 (lowest rate)	Don't know -No opinion - Not applicable
XHTML files + inline XBRL tagging requirements						
XML files						
CSV files						
Excel						
Formats enabling natural language processing						

Other						
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Please specify what are the other machine-readable formats that you would find suitable:

Please explain your position providing your arguments, and where appropriate, concrete examples and evidence to support your answers:

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. We believe it would be very costly both to set up and to maintain, irrespective of the format.

Question 30. How should information be delivered by referring entities to receiving entities?

Please select as many answers as you like:

In a decentralised manner (between referring entities and receiving entities)	
Through a centralised hub	
Means of communication should be left to the discretion of the referring entity	
Other	X

Please specify how else should information be delivered by referring entities to receiving entities:

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. We believe it would be very costly both to set up and to maintain, irrespective of the format.

The best way would be through the website of public authorities in a general, standardised way.

Question 31. How should the information be accessible by receiving entities?

Please select as many answers as you like:

Through Application Programming Interfaces (APIs)	
Bulk download	
Through a web portal	
In PDF	
Other	X

Please specify how else should information be accessible by receiving entities:

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. We believe it would be very costly both to set up and to maintain, irrespective of the format.

Question 32. The SME-related information should be delivered by referring entities to receiving entities:

Please select as many answers as you like:

in the language of the Member State of the referring entity	
in a language that is customary in the sphere of international finance	
in multiple or all EU languages where a digital translation solution is possible	X

We recommend EBA/ESMA website, and translated into EU member states languages.

Question 33. Would these technological solutions be easily accessible to all parties (in terms of costs, onboarding etc)?

Yes	
No	
Don't know / no opinion / <u>not relevant</u>	X

Please explain why these technological solutions would not be easily accessible to all parties:

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. We believe it would be very costly both to set up and to maintain, irrespective of the format.

Possible challenges

Question 34. Do you expect challenges linked to fraudulent behaviour to be:

Negligible	
Substantial but manageable	
Substantial and critical for at least some of the actors involved	
Don't know / no opinion / not relevant	

Question 34.1 Please specify for which of the actors involved you expect challenges linked to fraudulent behaviour to be substantial and critical:

It is hard to quantify the risks of fraudulent behaviour given the breadth of the proposed project and that the technological referral method amongst entities has not been decided. Having said that, the flow of sensitive client financial information from a credit entity (that is subject to rigorous prudential and supervisory standards) to other financial providers that are subject to far less stringent requirements is an important risk in and of itself. That risk becomes even greater if the referral initiative is applied across borders.

Question 35. What safeguards should be put in place to avoid fraudulent behaviour?

- a) of referring entities:
- b) of receiving entities (banks or finance providers and platforms):
- c) of rejected entities (SMEs):

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. We believe it would be very costly both to set up and to maintain, irrespective of the format.

Question 36. What other challenges do you expect for the stakeholders involved: banks, finance providers and platforms, SMEs, supervisory/designating authorities? For each challenge, please specify whether you would expect them to be negligible, substantial but manageable or substantial and critical for at least some of the actors involved (if so, which ones?):

- a) Banks:

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. We believe it would be very costly both to set up and to maintain, irrespective of the format.

To be able to implement a referral system for SMEs along the lines of the suggested practices in the consultation would represent insurmountable and unjustified challenges to finance providers and authorities regarding: costs, compliance, liability and data protection, among many others.

- b) Finance providers and platforms:
- c) SMEs:
- d) Supervisory authorities / designating authorities:

Question 37. What mitigating measures to the challenges above would you recommend?

Please select as many answers as you like:

Mitigating measures to the other challenges above faced by banks	
Mitigating measures to the other challenges above faced by finance providers and platforms	
Mitigating measures to the other challenges above faced by SMEs	
Mitigating measures to the other challenges above faced by supervisory authorities / designating authorities	

Please explain why you would recommend mitigating measures to the other challenges above faced by banks:

Please explain why you would recommend mitigating measures to the other challenges above faced by finance providers and platforms:

Please explain why you would recommend mitigating measures to the other challenges above faced by SMEs:

Please explain why you would recommend mitigating measures to the other challenges above faced by supervisory authorities / designating authorities:

Question 38. You expect challenges linked to raising awareness / promotion of the scheme among SMES to be:

Negligible	
Substantial but manageable	
Substantial and critical for at least some of the actors involved	
Don't know / no opinion / not relevant	

Question 38.1 Please specify for which of the actors involved you expect challenges linked to raising awareness / promotion of the scheme among SMES to be substantial and critical:

We expressly reject the proposal of requiring any entity to send any information about an applicant to any other specific entity for the reasons we have provided above. We believe it would be very costly both to set up and to maintain, irrespective of the format.

Question 39. How to raise awareness/promote such referral schemes among SMEs?

Further public initiatives on financial education would be highly beneficial in this space, especially actions targeted at SMEs would be critical.

Existing schemes

A bank referral scheme has been in place in the UK since 2016. The Credit Review Office in Ireland re-assesses SME rejected credit applications. In Spain, when banks deny or cancel financing facilities to an existing SME client, they are required to provide the SME with a standardised “SME information sheet” with credit information that the SME can use to approach other finance providers.

Question 40. Are you aware of similar or related schemes aiming at helping SMEs access funding when their credit applications have been rejected, in EU and non-EU countries?

Yes	
No	
Don't know / no opinion / not relevant	

How many of these schemes you are aware of would you like to detail here?

1 scheme	
2 schemes	
3 schemes	
4 schemes	
5 schemes	
none	

Questions to respond per Scheme referenced above:

Please describe scheme number X :

How effective do you consider scheme number X to be?

1 - Not effective	
2 - Rather not effective	
3 - Neutral	
4 - Rather effective	
5 - Very effective	
Don't know / no opinion / not relevant	

Has scheme number X raised challenges to stakeholders involved?

Yes	
No	
Don't know / no opinion / not relevant	

Were these challenges raised by scheme number X overcome, and how?

Question 41. Is there anything else that you would like to bring to the attention of Commission services in respect to a potential EU referral scheme for SMEs?