

26th June 2009

To Vice-President Günter Verheugen
Commissioner for Enterprise and Industry

From The Bureau of European Design Associations (BEDA)

Dear Vice-President Verheugen,

For your information, please find set out below, a copy of BEDA's submission to the public consultation on the European Commission's Staff Working Document, 'Design as a driver of user-centred innovation'.

Section 1: Identification of the stakeholder (compulsory)

1) Name of organisation:

The Bureau of European Design Associations (BEDA)

2) In which country is the organisation you represent located?

Belgium

3) What kind of organisation do you represent? If more than one category applies, choose the most characteristic one.

Not-for-profit

International organisation

* Which statement best describes the activities of your organisation?

'Our main activities are related to design' (e.g. design, design promotion, design support, design policy, design education, design consulting, etc. whereof innovation may be one aspect)

Section 2: The key questions (compulsory)

General role of design in public policy

4a) Do you consider design to be important for the future competitiveness of the EU economy?

Very important

4b) Why?

Design is the unique strategic process and skilled activity which enables innovation – scientific and technological innovation as well as non-technological innovation (brand, identity, new product and service development, existing product and service development) – to become focused upon user needs and translate more rapidly and more effectively from idea to marketplace. This in turn makes businesses and organisations more competitive against their competitors not only through differentiating products and services, but also through the design of better communications. Considerable case-story material exists internationally to support this proposition.

Properly managed, design has many benefits for businesses and organisations. It can support the driving out of costs in manufacturing processes; deliver user-centred solutions to complex problems and can create and visualise visions of possible future scenarios that effectively support strategic decision-making and risk reduction. And all of this is achieved within a framework of understanding motivated by sustainability thinking and social inclusion.

Design can bring beauty and attractiveness of both concept and form. It can integrate cross-functional teams within an organisation through taking into account and making visible the needs of the end users.

Design contributes to clarity of communication and product and service distinctiveness ensuring market-place differentiation against competitors. The ability of SMEs across Europe to harness the design function will enable them to compete more powerfully and to develop products and services that are user-centred (whether an information system or a product; a public service or an environment, or a system) and which better meet not only existing, but also future needs.

Design can also have an impact on environment and energy use. Through developing products and systems – as well as communications - that put user-behaviour and needs at the centre of the development process, new approaches can be developed to alter the way in which people perceive consumption and how they manage their individual or collective energy use. For example, product solutions are already emerging for the home which offer direct feedback to consumers on their actual energy ‘spend’ thus making what was once invisible, visible at the time of use.

Design can also help reinforce and develop cultural voice and identity at the level of individuals, organisations, cities, regions and nations.

Design thinking - particularly in the formative stages of a project - can generate new concepts which are ahead of the marketplace and which can build leadership (and even ownership) in a new market space.

5) What are the main areas where public initiatives in support of design could be useful, if any? (Multiple answers possible)

- Awareness raising and design promotion
- Design support to organisations
- Design research
- Design education
- None (public initiative in support of design is not useful)

Other, namely:

1/ The development and implementation of capacity building strategies and programmes for SMEs in introducing, managing and integrating design into their business processes. (Not only promotion as 'show and tell' / story-telling, but also direct engagement and development processes bringing new ways of working to industry and the service and public sectors (eg UK's Designing Demand programme))

2/ Design strategy and management as fundamental components of business education

3/ The development of better instruments for the valid and comparable measurement and assessment of design's impact in business

4/ On-going programmes of design research for example, to elucidate more fundamentally design's contribution to innovation. This could also include design policy research in terms of understanding – at a European level – what approaches have best value.

5/ Better integration of design support, design research, and design education that facilitates knowledge sharing and new foresights

6/ Closer interchange and cross-over between the design and innovation communities

7/ Design support to strengthen the power of Europe's small and fragmented design industries sector and to increase its ability to deliver best in class outcomes

6) Should initiatives in support of design be an integral part of innovation policy?

Yes

Scope for action at EU level

7) Should initiatives in support of design be taken at EU level in addition to Member State and regional level?

Yes

[If the answer to question 7 is yes:] In what main areas would EU level initiatives add value to the own initiatives of Member States and their regions?

1/ A clear vision for design in Europe as a powerful component of European innovation strategy - developed by the Commission with its key stakeholders and publicly supported and verbalised by the Commissioners and the Council of Ministers - will create a clear signal to all Member States that design is a matter of policy making.

This will act as a stimulus to Member States to continue (or initiate) development of national and regional policies and to openly maintain and develop support for design as a fundamental tool for future growth and competitiveness within the framework of a European vision for design as a driver of user-centred innovation. It will also serve to reinforce and strengthen the rationale for continuing and/or expanding existing programmes of design support within policy frameworks at national, regional and local levels.

2/ The ongoing development, evaluation and iteration of European Design Policy with supporting tools and resources (eg structural funding programme for design; a European design and innovation observatory)

3/ A permanent platform and representation for design as an integral aspect of innovation strategy and effectiveness at the European level.

This might take the form of:

- * an envoy for design (as there is already for SMEs) or a designated officer reporting to the SME envoy**
- * a designated officer in each Directorate General with a responsibility for design policy and design policy implementation**
- * a cross Directorate Design Policy Unit within the Commission structure to gather information; commission research on design and design policy issues and to provide guidance to Member States of design policy development as a component of innovation**
- * the emergence of design as a new aspect of the work of the Council of Ministers**

4/ Sufficient intellectual and fiscal resources to enable a step-change in our ability to define and measure design as a cross-cutting, integral aspect of future competitive societies, and to re-define and deepen our perceptions of design's strategic potential

5/ Exchange and transfer of design policy know-how for and between Member States:

Eg: National and regional promotion strategies creating a level playing field across Europe with recognised minimum levels of activity and investment – adopting and spreading best practice; design and design management skills development and exchange; design knowledge transfer and mobility of design professions and qualifications across Europe.

6/ Improved and deepened EU and Member State Governments' policy knowledge, know-how and engagement with design – this could involve the development and delivery of awareness and training modules and programmes within the existing education curricula for EU Policy administrators, bureaucrats and decision-makers. (Not turning bureaucrats into designers but rather, building understanding, insight and language to better enable policy development)

7/ Improved practice in the procurement of design by governments and the public sector at Member State and European levels – and within the Commission and institutions of the EU.

Section 3: Specific questions

8) People associate design with different things. What is the first thing that comes to your mind when you hear the word 'design'?

A designed object or the design of an object

Design as an activity in an organisation

A drawing

An intellectual property right

Other, namely

A complex and sophisticated whole-business process that integrates, from the outset, creative and user-centred thinking into the development of products, services, environments and systems and which has, at its heart, the ability to re-define the perception of existing contexts and to invent new contexts thus enabling the visualisation of new scenarios and directions and the development of new, relevant and competitive solutions and outcomes. This process is supported through the engagement of professional, trained and uniquely qualified design services expertise.

The following could be an operational definition of design for the purpose of innovation policy development:

Design for user-centred innovation is the activity of conceiving and developing a plan for a new or significantly improved product, service or system that ensures the best interface with user needs, aspirations and abilities, and allows for aspects of economic, social and environmental sustainability to be taken into account.

9a) Do you agree with this definition as the basis for integrating design into European innovation policy?

No (not entirely)

[If no:] Why not?

Design is not simply a plan, although the etymology of the word may relate to this. Design is not only the planning, but also the first thinking concept, development and implementation stages. We would therefore suggest the following:

9b) What could alternatives be?

Design is a distinctive and specialised activity that contributes to user-centred innovation in the conceiving and developing of new or significantly improved products, services, environments or systems. Through design-based methodologies and expertise, it ensures an effective balance between best fit with user needs, aspirations and abilities and the need for profitability. It helps to visualise and define new directions at a strategic level and integrates from the outset, aspects of economic, social and environmental sustainability. It increases differentiation and competitiveness and stimulates wealth creation.

The definition of design for user-centred innovation suggested above stresses the potential of design to support socially responsible and environmentally sustainable innovation.

10) How important is the use of design to achieve social objectives?

Very important

11) How can EU policy promote design that takes user diversity into account, regarding for example physical and mental abilities, education and skills?

As a user-centred process, design as its best accommodates diversity as a fundamental and integral aspect of effective design. In promoting good design, EU policy can emphasise the needs of our diverse communities and the potential for design to research, explore and celebrate diversity as a key driver for creative solutions targeted to user needs.

‘Design for All’ is already a key concept in developing inclusive design outcomes taking into account diversity in physical and mental abilities.

The provision of education and skills in design and designing does not require that everyone becomes a designer (no more than music education assumes all students of music will become professional musicians). But, as a component of general education a sensitising of citizens to design from an early age will assist in the integration and uptake of design-based strategies and understanding across society.

The EU can promote ‘designed for diversity’ as a key strategy for European innovation

12) How important is the use of design to achieve environmental objectives?

Very important

13) How can EU policy promote design that takes environmental aspects into account, such as resource efficiency, durability, reuse and recycling?

Design is an effective tool for design for sustainability. The 2006-2008 EU project DEEDS, (in which BEDA was a partner), has already initiated steps to 'bring design to sustainability and sustainability to design'. It facilitated knowledge transfer between actors and the building of a best-practice library as a Europe-wide knowledge resource.

A large body of knowledge and best practice exists that can be drawn upon. Setting sustainability goals; offering guidelines to SMEs (through instruments such as dedicated websites or a Commission Handbook) and highlighting the link between sustainable practice and profitability could open best practice to a wider audience across Europe.

Design is a significant resource and tool that can bring total quality outcomes to sustainability products and services that seek to connect with consumers. Design can also strive to make visible consumers' own sustainability behaviour, for example through energy use as described earlier.

Design may be an innovation activity with untapped potential, especially in SMEs, low-tech companies and the service sector, where design usage is comparatively low.

14a) Is there a need for a more targeted policy for these three groups of organisations?

For SMEs:

Yes

For low-tech organisations:

Yes

For service organisations:

Yes

14b) Should such targeted policy exist at EU level?

Yes

15a) Does the current economic climate affect the relevance of design?

Yes

15b) What should be the role of design policy in response to the crisis, if any?

Design is often viewed as an expense rather than an investment. And yet design strategy integrated into a company or organisation (including a government) can help it to speculate and visualise future scenarios as an aid to decision-making in difficult and fluid circumstances and to stay alive or even achieve growth. It can enable companies to gain customer insights and to design beyond the downward curve of a recession developing thinking to intersect with

the upward turn. (This is precisely what Virgin Atlantic did during the previous recession in the early Nineties. By investing in design in a downturn they were able to develop their groundbreaking services for business and first-class intercontinental travel ready to launch when the market conditions returned to the upward cycle).

Companies and organisations in a recession need to attempt to define the new economic and market context and to be sufficiently flexible to adapt their business strategy and direction to the new circumstances. The key is to not only survive in the short term but to also be sufficiently strategic to still think ahead to the medium and longer term and to see that innovation can be the way to survive. This can demand innovations in new product, service and communication as well as the introduction of new ways of working.

The Commission is already involved in a number of design-related initiatives. What is potentially lacking is an explicit integration of design into European innovation policy.

16a) If there were to be a policy for design in Europe, how should it be related to innovation policy?

Design should be part of European innovation policy

16b) Why?

Design does not operate in isolation. Design integrates creative thinking from many disciplines and across standard business functions. It is a horizontal as well as a vertical force and it catalyses user-centred thinking within existing innovation processes.

Design can build upon existing good practice in innovation processes. It can enhance the innovation outcomes by bringing the needs of the user to bear from the outset (supported by customer insight research eg: ethnography, behaviour observation, etc); by visualising future options and scenarios and by opening out the thinking space (the frame) within which innovation can occur. Design supports the creation and visualisation of new concepts and new directions. Design is strategy.

Design can bring beauty and relevance of form to products, services and systems – it can harness and implement aesthetic aspects as an integral (as opposed to surface-only) element of any solution.

17) How could other EU policies or initiatives — for example in the fields of internal market, research, social inclusion, education or culture — be instrumental in supporting design?

Design is both a vertical and horizontal, cross-cutting and integrating mode of perceiving and working. For the internal market we feel that much remains to be done in terms of removing barriers to free trade and in establishing level playing fields in training and qualification of designers across Europe to sustain and promote mobility and access. For research we feel that considerable research is urgently required into not only building a valid and relevant

statistical model and set of definitions and descriptions for design activity in relation to general economic activity, but also in terms of its impact on innovation activity. Further research is required on the actual and perceived linkages between innovation strategy and design policy (and how each might inform the other) as well as the development of better insights into effective methodologies to introduce design process in company and business culture.

Service design also requires further scrutiny and development. In education, we believe that Design thinking could become an essential and universal component of every child's education – (design strategies to improve learning) – in order to add capability to enhance the domains of number and word alone. This is a far-off goal but we believe that it would support in the medium-to-longer term, better overall academic performance, as well as the building of a broader and more flexible skills-base upon which young people can connect more readily to enterprise. For culture we believe that design can help to articulate and voice identity not only of organisations but also of communities.

Finally, we believe that policy-making itself can benefit from design thinking as it brings with it an understanding and a clearer more proactive focus on the needs and aspirations of the end-user.

18) What would be the best forum to discuss policy on design for user-centred innovation at EU-level?

A new forum

[If new:] Who should be part of this new forum?

BEDA

Established national and/or regional design promotion organisations in Member States

Innovation and design research community

Innovation and design strategy consultants

Design Managers

Relevant design organisations (eg EIDD)

Business representative organisations

Enterprise and Innovation Directorate

European Association for Design Schools – Cumulus

High level representation from selected Member State governments (industry and economy Minister/s)

This new forum could be linked to or have observational or active representation on relevant, existing fora. This would facilitate the introduction of the design dimension into existing expert communities.

A key objective of the forum would be to create a ‘roundtable’ that better connects key players from the fields of innovation and design in order to seek to create and facilitate increased understanding and new synergies.

19a) Which are the most serious barriers to the better use of design in Europe, if any?
(Multiple answers possible)

Lack of statistics and statistical analysis on design

Lack of awareness and understanding of the potential of design among policy makers

Lack of knowledge and tools to evaluate the rate of return on design investment

Lack of design skills and understanding among other professions

19b) Please substantiate your answer:

FOR POLICY MAKERS:

At the EU Workshop in Marseilles it was considered that the task of achieving a single, accepted ‘definition’ of design useable in every context – is probably a false goal. However, it was discussed that it is possible to describe the impact of design on business and organisational performance. This is a task that should be brought forward. For this reason we have not highlighted ‘Lack of common definition of the word ‘design’ above.

Nevertheless, BEDA recognises that in order to enable the development of more sophisticated and on-going research into design method, culture, skills and impact, a working definition of ‘design’ for purposes of the research community would be very helpful. An agreed research definition – or a suite of descriptions within an agreed taxonomy – would assist in the development of coherent policy over time. This in turn would support the emergence of valid and comparable data on design’s impact within the European economy. But to be achieved properly, this significant task will require the commitment of resources and time.

*BEDA recommends the setting up of an EU-funded programme to support the establishment of a cross sectoral research group to facilitate the development of a three-year process to identify a working definition of design for the research community.

FOR BUSINESS AND INDUSTRY

BEDA recognises that businesses committing to design need to understand or have some degree of confidence in the return on investment. This is needed if the widely held perception of ‘design as an expensive cost’ is to be shifted to ‘design as an investment’.

The lack of design awareness and some of the skills and tools of design in other professions can be confronted at an early stage through improved mainstream education in design.

19c) Are there any other serious barriers?

Design is not sufficiently cited as a strategic tool at a high political level. BEDA believes that a powerful stimulus to Member States and European industry to consider design as a strategy for competitiveness would be the ongoing (even occasional) reference to design as a significant driver for innovation in the speeches and utterances of the EU Commissioners.

Lack of access to design skills compounded by a lack of European-level tools to support access to identify and match design expertise to companies

The lack of professional recognition of the profession

19d) What can be done at EU level to address these barriers specifically?

An annual pan-European research congress reflecting upon and defining design's role within innovation

An EU design policy unit to gather statistics and information which can be collated and analysed to generate new understanding and new insights

A series of briefings for the Council of Ministers' on design as a driver of user-centred innovation

EU level guidance for Member States on developing national design policies with examples of good practice and identification of areas where improvements could be achieved (eg in the development of new knowledge in design promotion and development processes – what works and what does not)

The development of a cluster policy for European strategic design companies which would seek to harness the leading-edge knowledge and learning and to build and strengthen their existing capability

A European programme to identify and communicate new trends and thinking in the relationship between design and the environmental and social fields in order to provide design policy guidance and support to Member States

The development of a pan-European resource on design expertise. This could take the form of a web portal connecting potential design commissioners to design expertise and know-how. This could be supported by a network of connected personnel sited within existing regional or national design centres and other established design organisations across Europe.

The development of different European centres of expertise in different categories of design and sited in Member States. These might cover themes such as design and business; design and environment; design and learning; design and economics etc.

The following vision is the result of a European innovation policy workshop organised with experts in design and design policy in Marseille, in June 2008:

To build on our existing strengths and our heritage to make Europe a reference for design excellence, whether for research, education and skills — attracting and retaining the best talents, for high-end design and excellence, and for breadth and depth of design usage in private and public organisations.

20a) Is this a good vision for European collaboration in the area of design?

No

20b) What could alternatives be?

As an engaged participant in the Marseilles workshop we do not recognise aspects of this vision statement as reported, in particular reference to 'high-end design' which seems to imply exclusiveness and 'luxury'.

Our feeling is that for Europe to have a vision for design is in itself a powerful vision and message to our competitors on the global stage.

The vision should be visionary and clear. It should also be flexible and dynamic in enabling the widest possible range of stakeholders to engage.

We believe the vision statement could be constructed from the following ingredients:
Improved quality of life for the citizens of Europe within the context of globalisation and the forces of economic, social and environmental change

A more competitive Europe even at a time of recession whereby talent is sustained and the chances of jobs being protected is increased through better design and innovation capacity

We agree with the first part of the statement:

- * That Europe should recognise and build on its existing strengths (which should be preserved and further reinforced)
- * That Europe becomes the (not 'a') reference for design, building on and innovating forwards from our long and distinctive design history and heritage

In addition:

- * That design should contribute to both economic and social growth with a strong cultural voice articulating identity for Member States – strength in unity through diversity
- * That the European Commission and the institutions of EU government should be the government in the world which commits more even than our Asian competitors to growing

and developing the design field as a growing and increasingly important domain of competence and expertise which can build unique power for European companies and organisations to compete and which can take innovation to a new level of sophistication unmatched by our rivals

*** That DESIGN EUROPE should be the organising concept for enhanced innovation excellence where the uptake of design strategies and management is widespread across sectors in both technological and non-technological innovation activity.**

21) Other comments:

One distinction not well covered in the consultation document is the ability of design thinking as a business strategy and direction process, to create entirely new market spaces into which new products and services (and integrations of the two) can be combined. This aspect can be supported on request with a number of case studies which BEDA would be happy to source.

We are grateful to the Commission and in particular to the foresight of the Commission President and Vice President in launching this policy initiative.

Should it be deemed appropriate, BEDA is available to participate in and support any further development post-consultation as the Commission moves towards developing its agenda post-2010.

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