



Annual Report

2019

Regel|rådet



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Foreword

Understanding how new laws affect companies' conditions and circumstances is crucial for decision-makers to be able to decide on new legislative proposals. The Swedish Better Regulation Council has been in existence for 11 years and I have been its chair for 6 months. I am concerned that more than half of the impact assessments coming from committees of inquiry still do not have an acceptable impact assessment. Committees of inquiry are set up to understand in a comprehensive way how a task can be resolved and can be formulated in a legislative proposal as effectively as possible. There are also new legislative proposals where impact assessments have actually been carried out, but where there is clearly no understanding of the activities of business. I see two clear areas for improvement in order to improve legislation for business in this respect.

The first is about the political leadership, just as the Minister for Enterprise has done in the autumn, highlighting and prioritising the work on regulatory issues and better rules. We know from experience that sustained political focus means that those who write new legislation in turn prioritise work on pure impact assessments. The Swedish Better Regulation Council has previously pointed out improvement proposals to increase the quality of regulators' efforts to investigate the consequences of the regulations on business. This Annual Report clarifies the improvements made in the past, which I believe have not yet had an impact on the descriptions of consequences, while at the same time some new proposals have been developed. It is our hope that these proposals will guide qualitative work ahead.

The second is that the Swedish Better Regulation Council's review must be carried out earlier in the process in order to have the best possible effect. An early review means that the regulator has the opportunity to include viewpoints and, if necessary, rework the impact assessment. This applies whether it is a national proposal or a proposal for EU rules.

All actors need to contribute to work on regulatory issues and better rules, and it is therefore crucial that the questions remain a priority in the political agenda. In the autumn, the Swedish Better Regulation Council submitted a request to the government with proposals for changes in the handling of the Swedish Better Regulation Council's review of impact assessments created at EU level. Conditions need to be given to develop good, well-assessed rules in an effective way. In the long run, this saves time and costs both for regulators, in the form of less need for additions and adjustments, as well as for those who have to comply with the rules. With smart solutions, the work can be streamlined and brought forward for maximum benefit, while at the same time more appropriate rules are worked out. Such a process would benefit Swedish business. The Swedish Better Regulation Council will continue to drive the work forward by illustrating problems as well as possible solutions.



Elisabeth Thand Ringqvist
Chair

Summary

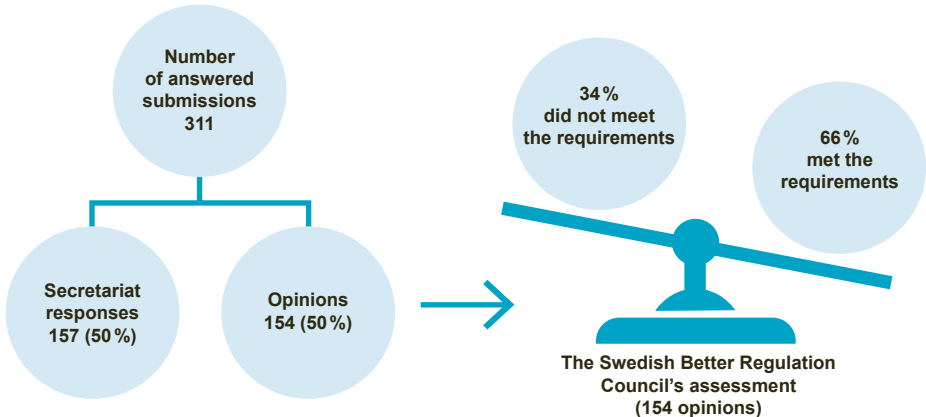
The Swedish Better Regulation Council

Which? The Swedish Better Regulation Council is a specific decision-making body. The Swedish Better Regulation Council consists of five members appointed by the government.

What? The task of the Swedish Better Regulation Council is to review the quality of impact assessments for proposed statutes that may have an impact on business. The assessment is based on the requirements set out in sections 6 and 7 of the Ordinance on Regulatory Impact Assessment (Swedish Code of Statutes 2007:1244).

How? When a proposal is deemed to have an impact of importance for business, the Swedish Better Regulation Council gives an opinion on the quality of the impact assessment. The Swedish Better Regulation Council may also refrain from giving its opinion and instead provide a secretariat response, for example if the proposal is not deemed to have an impact of importance for business.

Answered submissions



Apportionment of opinions 2019

Government Offices of Sweden

40 submissions

- 60% met the requirements
- 40% did not meet the requirements

Official government reports (SOU)

22 submissions

- 41% met the requirements
- 59% did not meet the requirements

Government authority reports

6 submissions

- 50% met the requirements
- 50% did not meet the requirements

Administrative authorities

86 submissions

- 77% met the requirements
- 23% did not meet the requirements



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Introduction

The Swedish Better Regulation Council's mandate

The Swedish Better Regulation Council is a specific decision-making body whose task is to review impact assessments into new and amended regulations that have an impact on business. If the regulator determines that a proposed statute may have such effects, the proposal and the associated impact assessment shall be referred to the Swedish Better Regulation Council. The Swedish Better Regulation Council examines the referred impact assessments and assesses whether they meet the requirements set out in sections 6 and 7 of the Ordinance on Regulatory Impact Assessment (Swedish Code of Statutes 2007:1244), abbreviated below to KUF. The Swedish Better Regulation Council also reviews impact assessments created at EU level, at the request of the responsible Swedish ministry or authority.¹

The Swedish Better Regulation Council was established in 2008 as part of the government's work on regulatory simplification for business. During the period 2009–2014, the Swedish Better Regulation Council was organised as a committee. In 2015, the activities of the Swedish Better Regulation Council became permanent and have since been organised as a specific decision-making body within the activities of the Swedish Agency for Economic and Regional Growth.

The composition and organisation of the Swedish Better Regulation Council

The Swedish Better Regulation Council consists of a chair, a vice chair and three ordinary members. Since May 2019², Elisabeth Thand Ringqvist has been chair. Claes Norberg is vice chair and Hanna Björknäs, Yvonne von Friedrichs and Lennart Renbjær are the ordinary members. The deputies are Annika Bergman, Mikael Ek, Lars Silver and Marie-Louise Strömgren.

The Swedish Better Regulation Council is assisted by the Swedish Agency for Economic and Regional Growth's staff at the Better Rules unit in carrying out its tasks, such as preparing matters for the meetings of the Swedish Better Regulation Council. The work is coordinated by a director at the Swedish Agency for Economic and Regional Growth with special powers delegated by the Swedish Better Regulation Council.

Contents of the report

This is the 11th Annual Report of the Swedish Better Regulation Council, which summarises the statistics on matters submitted to the Swedish Better Regulation Council as well as the other activities of the Swedish Better Regulation Council in 2019.

¹ The mandate and composition of the Swedish Better Regulation Council is set out in sections 17-19 of the Ordinance (2009:145) with instructions for the Swedish Agency for Economic and Regional Growth.

² During the period January-April 2019, Claes Norberg was acting chairman.

The Swedish Better Regulation Council



Elisabeth Thand Ringqvist | *chair*



Claes Norberg | *vice chair*



Hanna Björknäs | *member*



Yvonne von Friedrichs | *member*



Lennart Renbjer | *member*

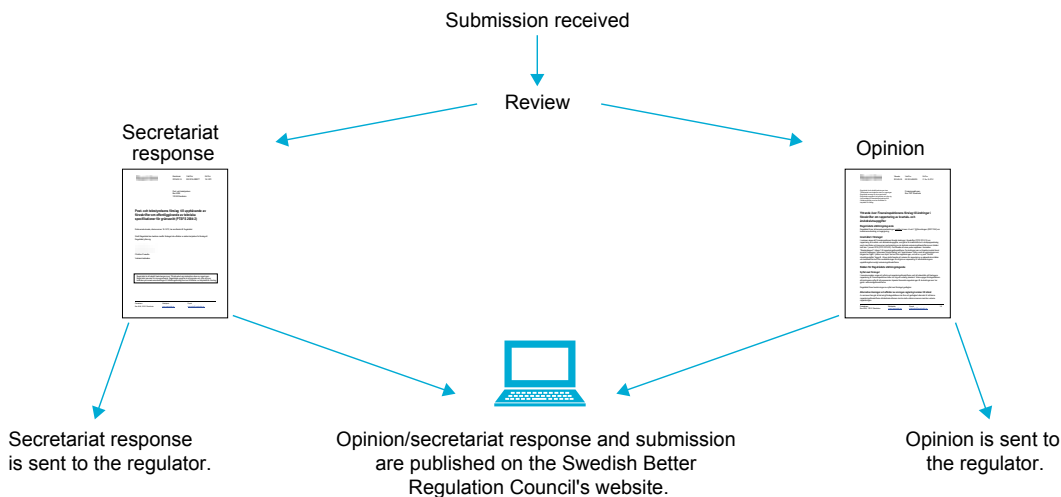


Christian Pousette | *director*

Reviews in practice

Ministries and authorities shall refer proposals for new and amended regulations that may have an impact of importance for business to the Swedish Better Regulation Council. For authorities, this is governed by the Ordinance (2011:118) on the authorities' obtaining of opinions from the Swedish Better Regulation Council and for the government ministries by Guidelines for the Government Offices of Sweden's transmission of documents to the Swedish Better Regulation Council.

When a submission is received by the Swedish Better Regulation Council, the first assessment is whether the submission shall be answered with an opinion or a secretariat response. A secretariat response means that the Swedish Better Regulation Council does not give an opinion on the submitted proposal. The secretariat response sets out the reason for this. See also section *Secretariat responses*. The decisive factor for the assessment is whether the proposal could have effects of such importance for business that the Swedish Better Regulation Council should give its opinion. Effects of importance for business include both economic and other effects. If the proposal is deemed to have effects of importance for business, or if the effects of the proposal cannot be assessed, the Swedish Better Regulation Council responds to the submission with an opinion.



Opinions

The Swedish Better Regulation Council has been working for a number of years to draw up opinions with the most clear assessments possible, since the opinions of the Swedish Better Regulation Council are the main channel for reaching out to regulators. The elements of the impact assessment that have improvement potential therefore need to be clearly identified. The purpose of this is to improve the quality of future impact assessments, which will hopefully have the effect of making the effects of the rules coming into force better researched and known than they would have been with a poorer quality impact assessment.

The opinion of the Swedish Better Regulation Council first shows the position regarding the impact assessment in its entirety – whether the Swedish Better Regulation Council finds that the impact assessment meets or does not meet the requirements of sections 6 and 7 of the KUF. This



aims to ensure that the reader directly sees how the Swedish Better Regulation Council has assessed the impact assessment. The contents of the submission are then described followed by all paragraphs in sections 6 and 7 divided into the different aspects. For each such heading, one or more partial assessments are made of a particular section of the impact assessment. The partial assessment indicates whether the point can be considered acceptable or deficient.

After all the headings comes the Swedish Better Regulation Council's overall assessment. Under this heading, the outcome of all the points of the proposer's impact assessment is put together into a final assessment. The final assessment is that the impact assessment meets or does not meet the requirements of sections 6 and 7 of the KUF.

Below are the aspects upon which the Swedish Better Regulation Council reviews the impact assessments.

Aspects of the impact assessment that the Swedish Better Regulation Council reviews

The Swedish Better Regulation Council assesses an impact assessment based on how well the proposer has presented the following aspects:

- 1. The purpose of the proposal**
- 2. Alternative solutions**
- 3. Effects if no regulation is issued**
- 4. Consistency of the proposal with EU law**
- 5. Particular attention to the date of entry into force**
- 6. Need for provision of special information**
- 7–9. Companies affected by number, size and industry**
- 10. Administrative costs resulting from the proposal**
- 11. Other costs resulting from the proposal**
- 12. Impact on companies' operations**
- 13. Effect on competitive conditions**
- 14. Effect on business in other respects**
- 15. Need for special attention for small businesses**

Secretariat responses

There are a number of reasons why a submission is answered with a secretariat response from the Swedish Better Regulation Council.

Reasons for secretariat responses

Limited effects on business: If the proposal is not judged to have effects of such importance for business that the Swedish Better Regulation Council should give its opinion. This is the most common reason for secretariat responses.

Resource reasons: There may be a high workload for the staff who prepare matters for the Swedish Better Regulation Council or the submission is received during the summer or Christmas and New Year holidays when the Swedish Better Regulation Council has no meetings.

Time reasons: According to the Ordinance (2011:118) on the authorities' obtaining of opinions from the Swedish Better Regulation Council and Guidelines for the Government Offices of Sweden's transmission of documents to the Swedish Better Regulation Council, the Swedish Better Regulation Council shall be given a response time of at least two weeks to answer a submission. If the proposer leaves a shorter time, the Swedish Better Regulation Council requests an extended response time. If this is not possible for the proposer, the submission is answered with a secretariat response.

Other reasons: It may be, for example, that no statute text has been referred to the Swedish Better Regulation Council or that the proposed statute is governed by superior legislation with no or very limited room for manoeuvre for the referring regulator.

Review of impact assessments created at EU level

Since 2011, the Swedish Better Regulation Council has been responsible for giving its opinion on impact assessments on draft regulations drawn up at EU level, which are deemed to have a major impact on business in Sweden. The mandate of the Swedish Better Regulation Council in these cases differs from the mandate when it comes to the review of impact assessments drawn up by a Swedish proposer. Opinions on EU impact assessments do not give judgments on whether or not the impact assessment meets the requirements. Instead, reasoning is made about the elements included in the EU impact assessment and whether a supplementary impact assessment needs to be drawn up in order to highlight the impact of the proposal on business in Sweden and which aspects need to be specifically reviewed in this. So far, the Swedish Better Regulation Council has recommended in all opinions that a supplementary impact assessment should be drawn up by the Swedish regulator.

The review of impact assessments created at EU level is more time-consuming and extensive than the review of impact assessments drawn up by a Swedish proposer.

Communication

The Swedish Better Regulation Council has a website³ where there is information about the opinions and secretariat responses of the Swedish Better Regulation Council and about the activities in general. There is also a statistics page where you can compare the results between different regulators. The Swedish Better Regulation Council's website had more than 10,000 visitors in 2019. The Swedish Better Regulation Council's newsletter Regelrätt is published six times a year. In Regelrätt there is information about some of the Swedish Better Regulation Council's opinions, as well as an interview with a person who is relevant to the field of the impact assessment. The number of subscribers is about 800, which has remained unchanged for a number of years. Subscribers may be persons working in government agencies or ministries, organisations or others interested in the activities of the Swedish Better Regulation Council.

³ www.regelradet.se



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International collaboration

The Swedish Better Regulation Council is one of seven members of the international network RegWatchEurope. The network consists of independent review bodies from Europe and is primarily a forum for the exchange of experience between members on impact assessments. Knowledge, questions and ideas on the simplification of the rules related to better impact assessments are also discussed and disseminated.

In addition to the Swedish Better Regulation Council, RegWatchEurope consists of review bodies in Finland⁴, the Netherlands⁵, Norway⁶, the United Kingdom⁷, the Czech Republic⁸ and Germany⁹.

The different review bodies have different mandates and resources, which means that the functions vary to some extent, but all review regulatory consequences and are advisory. For example, some councils have the task of reviewing the quality of evaluations of the impact of existing rules, the majority have dialogues with regulators for supporting purposes before completion of impact assessments and several have a broader role in each country's rule simplification work.

During 2019, the network has had a major focus on the exchange of experience. Several workshops have been organised to which regulatory review actors outside the network have also been invited and participated. Topics have included organisation and review process, evaluation and the "one in, one out" principle as a goal for regulatory costs. RegWatchEurope has also jointly produced a policy document setting out positions and recommendations for the European Commission and the European Parliament during the 2019–2024 mandate period¹⁰. The network also has a regular dialogue with, and attends conferences and meetings with, among others, the European Commission, the Regulatory Scrutiny Board¹¹ and the OECD Regulatory Policy Committee¹².

The contacts and exchange of experience contribute valuable insights for the Swedish Better Regulation Council about the challenges and possible solutions that exist for describing and reviewing the consequences of regulations.

4 Finnish Council of Regulatory Impact Analysis (FCRIA).

5 Advisory Board on Regulatory Burden (ATR).

6 Norwegian Better Regulation Council (NBRC/Regulatory Council).

7 Regulatory Policy Committee (RPC).

8 Regulatory Impact Assessment Board (RIAB).

9 Nationaler Normenkontrollrat (NKR).

10 <https://www.regelradet.se/wp-content/uploads/2019/12/rwes-key-messages-to-the-next-european-commission-and-european-parliament-on-priorities-for-the-better-regulation-agenda-1.pdf>

11 Regulatory Scrutiny Board.

12 Regulatory Policy Committee.



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Reviews in figures

In 2019, the Swedish Better Regulation Council dealt with 311 cases. 154 of these resulted in opinions (corresponding to a 50% share) and 157 resulted in secretariat responses (corresponding to a 50% share).

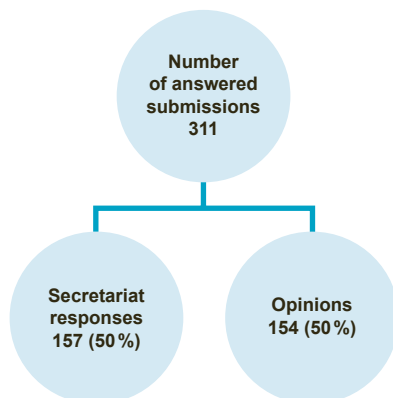


Figure 1: Answered submissions 2019.

Opinions

Of the 154 cases on which the Rules Council has given opinions, 102 have contained an impact assessment which has been deemed overall to meet the requirements of sections 6 and 7 of the KUF, which corresponds to a 66% share. The result is an improvement compared to 2018, when 56% of impact assessments were considered to meet the requirements.

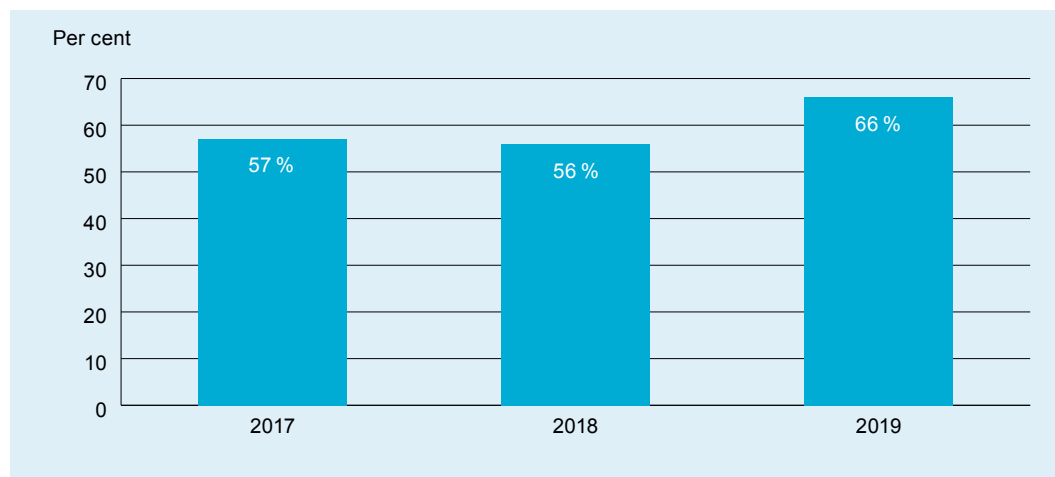


Figure 2: The Swedish Better Regulation Council's assessments of impact assessments in 2017, 2018 and 2019, proportion that met the requirements (%).

Results per aspect

Figure 3 shows the Swedish Better Regulation Council's assessment per aspect in opinions.

Results per aspect	2019		
	Number		Proportion acceptable (%)
	Acceptable	Deficient	
Purpose	152	2	99 %
Effects if no regulation is issued	141	13	92 %
Particular attention to the date of entry into force	132	22	86 %
Alternative solutions	126	28	82 %
Effects in other respects	126	28	82 %
Affected companies by industry	124	30	81 %
Consistency with EU law	125	29	81 %
Provision of special information	112	40	73 %
Changes in business activities	103	51	67 %
Number of companies affected	102	52	66 %
Other costs	97	57	63 %
Special attention for small businesses	96	58	62 %
Administrative costs	96	60	62 %
Competitive impact	89	65	58 %
Size of the companies affected	77	77	50 %

Figure 3: The Swedish Better Regulation Council's assessment per aspect, 2019 (ranked by the highest percentage of acceptable).

The points in sections 6 and 7 of the KUF with the highest percentage of acceptable descriptions are:

- The proposer's description of the purpose and what it wants to achieve with regulation (99%),
- Effects if no regulation is issued (92%),
- Particular attention to the date of entry into force (86%),
- Alternative solutions (82%),
- Effects in other respects (82%),
- Affected companies by industry (81%),
- Consistency of the proposal with EU law (81%) and
- Need for provision of special information (73%).

The points in sections 6 and 7 of the KUF with the lowest percentage of acceptable descriptions are:

- Size of the companies affected (50%),
- Consequences for competition between companies (58%),
- Impact of the proposal on the administrative costs of the companies concerned (62%),
- If special account is necessary for small companies in the formulation of the rules (62%),
- Impact on companies' other costs (63%),
- Number of companies affected (66%) and
- Need for changes in companies' business activities (67%).

The Swedish Better Regulation Council makes a cumulative assessment of the impact assessment in every case. According to section 7 of the KUF, proposers must describe to the extent possible the impact of the proposal on companies. What is possible to describe, and how detailed it is possible to describe it, varies between different cases. The nature of a proposal therefore has an impact on what can be considered a sufficient description in an individual case. In some cases, it may be difficult to obtain clear information. If, in such a case, the proposer describes the attempts made and the Swedish Better Regulation Council does not find grounds to challenge the information, this may be considered acceptable, while if the proposer omits the information or states, without describing why in more detail, that it has not been possible to obtain information, the assessment is deficient.

In most cases, there are aspects that are particularly heavily weighted by the impact of the proposal on companies in a particular respect and how the proposer has managed to describe exactly this. Such circumstances may make the difference between an overall acceptable and an overall deficient impact assessment.

Apportionment of opinions – sender

The Swedish Better Regulation Council receives submissions from administrative authorities and the various government ministries of the Government Offices of Sweden. The results are presented as follows:

1. Memoranda and other internally produced submissions, referred by the Government Offices of Sweden.
2. Official government reports (SOU) produced by committees of inquiry and referred by the Government Offices of Sweden.
3. Government authority reports produced by administrative authorities. These may be referred by the Government Offices of Sweden or by administrative authorities. Government authority reports contain proposals for new or amended legislation drawn up by administrative authorities. Most often it is the result of a government commission, but they can also be created on their own initiative by the administrative authority, through a so-called request to the responsible ministry.
4. Submissions prepared and referred by administrative authorities, containing proposals for regulations.

The 154 submissions leading to opinions in 2019 were distributed as follows:

- 40 submissions produced internally within the Government Offices of Sweden
- 22 official government reports (SOU)
- 6 government authority reports
- 86 submissions from administrative authorities.

Referring body and type of submission	Total	Share of all submissions received (%)	Meets requirements	Does not meet requirements	Proportion that meet requirements (%)
Government Offices of Sweden	40	26 %	24	16	60 %
Official government reports	22	14 %	9	13	41 %
Government authority reports	6	4 %	3	3	50 %
Administrative authorities	86	56 %	66	20	77 %

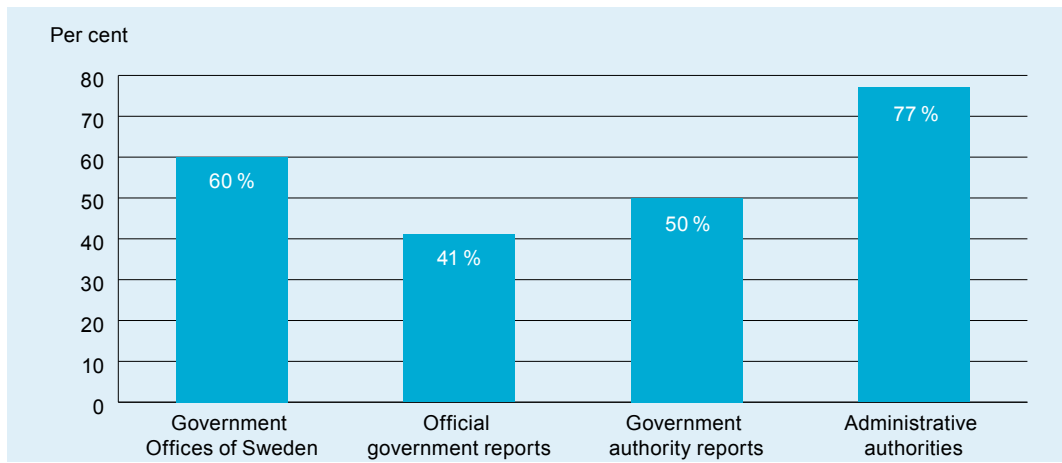


Figure 4: Distribution of opinions and proportion that met the requirements, 2019.

- Of the Government Offices of Sweden's internally developed impact assessments, 24 out of 40 were judged to meet the requirements (60 per cent). This compares with 2018, when 11 out of 31 (35 per cent) and 2017, when 13 out of 42 (31 per cent) respectively, were assessed as meeting the requirements.
- Of the impact assessments related to official government reports, 9 out of 22 were judged to meet the requirements (41 per cent). This compares with 2018, when 13 out of 20 (65 per cent) and 2017, when 9 out of 23 (39 per cent) respectively, were assessed as meeting the requirements.
- Of the impact assessments related to government authority reports, 3 out of 6 were assessed as meeting the requirements (50 per cent). This compares with 2018 and 2017, when 9 out of 11 (82 per cent) were judged to meet the requirements in both years.
- Of the impact assessments related to submissions from administrative authorities, 66 out of 86 were assessed as meeting the requirements (77 per cent). This compares with 2018, when 50 out of 81 (62 per cent) and 2017, when 46 out of 58 (79 per cent) respectively, were assessed as meeting the requirements.

Government Offices of Sweden

The Swedish Better Regulation Council gave its opinion on the impact assessments in 40 submissions produced internally at the Government Offices of Sweden. 24 of these, corresponding to 60 per cent, were considered to meet the KUF requirements. This compares with 2018, when 11 out of 31 (35 per cent) and 2017, when 13 out of 42 (31 per cent) respectively, were assessed as meeting the requirements.

Government Offices of Sweden	Number		
	Meets requirements	Does not meet requirements	Total
Ministry of Employment	1	0	1
Ministry of Finance	14	9	23
Ministry of Infrastructure	3	2	5
Ministry of Justice	3	2	5
Ministry of the Environment and Energy	0	1	1
Ministry of the Environment	2	0	2
Ministry of Enterprise and Innovation	0	1	1
Ministry of Health and Social Affairs	1	1	2
Total	24	16	40

Figure 5: Opinions of the Swedish Better Regulation Council on the internally prepared submissions of the Government Offices of Sweden, 2019.

Official government reports (SOU)

The Swedish Better Regulation Council gave its opinion of the impact assessments in 22 official government reports. 9 of these, corresponding to 41 per cent, were considered to meet the KUF requirements. This compares with 2018, when 13 out of 20 (65 per cent) and 2017, when 9 out of 23 (39 per cent) respectively, were assessed as meeting the requirements.

Official government reports	Number		
	Meets requirements	Does not meet requirements	Total
Ministry of Employment	1	0	1
Ministry of Finance	1	4	5
Ministry of Defence	0	1	1
Ministry of Infrastructure	1	0	1
Ministry of Justice	0	2	2
Ministry of Culture	0	1	1
Ministry of Enterprise and Innovation	3	0	3
Ministry of Health and Social Affairs	1	3	4
Ministry of Education and Research	2	2	4
Total	9	13	22

Figure 6: Opinions of the Swedish Better Regulation Council on official government reports by referring government ministries, 2019.

Government authority reports

The Swedish Better Regulation Council gave its opinion of the impact assessments in 6 government authority reports. 3 of these, corresponding to 50 per cent, were considered to meet the KUF requirements. This compares with 2018 and 2017, when 9 out of 11 (82 per cent) were judged to meet the requirements in both years.

Government authority reports Referring ministry and responsible administrative authority	Number		
	Meets requirements	Does not meet requirements	Total
Ministry of Finance/Swedish Tax Agency	0	1	1
Ministry of Infrastructure/National Board of Housing, Building and Planning	0	1	1
Ministry of Infrastructure/ Swedish National Board of Housing, Building and Planning and the Swedish Energy Agency	0	1	1
Ministry of Infrastructure/Swedish Transport Administration	1	0	1
Ministry of Infrastructure/Swedish Transport Agency	1	0	1
Ministry of Enterprise and Innovation/ Swedish Companies Registration Office and Swedish Agency for Economic and Regional Growth	1	0	1
Total	3	3	6

Figure 7: Opinions from the Swedish Better Regulation Council on government authority reports by referring ministry and responsible authority, 2019.

Administrative authorities

The Swedish Better Regulation Council gave its opinion on the impact assessments in 86 submissions from administrative authorities, 66 of which were deemed to meet the requirements of the KUF. This corresponds to 77 per cent, which can be compared to 2018 when 50 out of 81 (62 per cent) and 2017, when 46 out of 58 (79 per cent) respectively, were assessed as meeting the requirements.

Administrative authority	Number		
	Meets requirements	Does not meet requirements	Total
Swedish Work Environment Authority	0	1	1
National Board of Housing, Building and Planning	2	1	3
Energy Markets Inspectorate	1	2	3
Swedish Energy Agency	1	0	1
Estate Agents Inspectorate	0	1	1
Swedish Financial Supervisory Authority	6	0	6
Public Health Agency	0	3	3
Swedish Social Insurance Agency	1	0	1
Swedish Agency for Marine and Water Management	4	3	7
Swedish Board of Agriculture	8	0	8
Swedish Consumer Agency	0	1	1
National Food Administration	1	0	1
Medical Products Agency	0	1	1
County Administrative Board of Västra Götaland	1	0	1
Digital Administration Authority	0	1	1
Swedish Broadcasting Authority	1	0	1
Swedish Civil Contingencies Agency	2	0	2
Swedish Environmental Protection Agency	3	1	4
Patent Board	0	1	1
Swedish Post and Telecom Authority	1	1	2
Audit Inspectorate	0	1	1
Swedish National Debt Office	0	1	1
Swedish Maritime Administration	3	0	3
Swedish Forest Agency	1	0	1
National Agency for Education	1	0	1
Statistics Sweden	7	0	7
Dental and Pharmaceutical Benefits Agency	1	0	1
Swedish Agency for Economic and Regional Growth	1	0	1
Swedish Transport Administration	15	0	15
Swedish Transport Agency	5	1	6
Total	66	20	86

Figure 8: Opinions from the Swedish Better Regulation Council on submissions from administrative authorities, 2019.

Results per aspect – broken down by sender and type of submission

Results by aspect – Government Offices of Sweden internally

A review of the Swedish Better Regulation Council's assessments per aspect among the impact assessments related to the Government Offices of Sweden's internally produced submissions reveals the following, for example:

- The Swedish Better Regulation Council has previously stated that the Government Offices of Sweden describe the points relating to section 6 of the KUF relatively well. This seems to be a trend that continues. Other than the description of provision of information, the acceptable proportions are between 73 per cent (alternative solutions) and 100 per cent (description of the background and purpose of the proposal). The proportion of acceptable descriptions of the need for provision of information is 58 per cent.
- The descriptions of the aspects of section 7 of the KUF have a lower proportion of acceptable partial assessments. The description of the size of the companies concerned has the lowest proportion of acceptable partial descriptions with a 43 per cent share, while in other respects the description of the impact of the proposal on business has the highest proportion of acceptable descriptions with a 90 per cent share.
- When compared to the 2018 results, it can be noted that the greatest improvements in descriptions of individual aspects are in terms of the description of the need for special information (+ 42 percentage points), the impact of the regulation in other respects (+ 37 percentage points) and the competitive impact of the proposal (+ 30 percentage points). Deteriorations are not as significant, the greatest being the effects if no regulation is issued (- 8 percentage points).

Results per aspect and regulator	Number		Number acceptable (%)
	Acceptable	Deficient	
Purpose	40	0	100%
Effects in other respects	36	4	90%
Effects if no regulation is issued	33	7	83%
Particular attention to the date of entry into force	33	7	83%
Affected companies by industry	33	7	83%
Consistency with EU law	31	9	78%
Alternative solutions	29	11	73%
Number of companies affected	27	13	68%
Changes in business activities	24	16	60%
Other costs	24	16	60%
Competitive impact	23	17	58%
Provision of special information	23	17	58%
Administrative costs	22	18	55%
Special attention for small businesses	20	20	50%
Size of the companies affected	17	23	43%

Figure 9: Assessment of the Swedish Better Regulation Council by aspect, internally prepared submissions of the Government Offices of Sweden, 2019.

Results per aspect – official government reports

A review of the Swedish Better Regulation Council's assessments per aspect among the impact assessments related to the official government reports reveals the following, for example:

- The Swedish Better Regulation Council has also previously noted for committees of inquiry that the aspects of section 6 of the KUF are described in a relatively good way. The acceptable proportions are between 82 per cent (alternative solutions and if there is a need for specific information) and 95 per cent (description of background and purpose and conformity of the proposal with EU law).
- As regards the description of the aspects of section 7 of the KUF, the lowest proportion of acceptable partial descriptions is the description of the impact of the proposal on the administrative costs of companies, with a share of 14 per cent. The highest proportion of acceptable descriptions is the description of the affected companies' industry with a share of 95 per cent.
- When compared to the 2018 results, it can be noted that the greatest improvements in descriptions of individual aspects are in terms of the need for special information (+ 52 percentage points) and the need for particular attention to the date of entry into force (+ 21 percentage points). The single greatest deterioration is the description of the impact of the proposal on the administrative costs of the companies concerned (- 41 percentage points). There are also deteriorations in the competitive impact of the proposal (- 15 percentage points) and whether special consideration needs to be given to small companies in the formulation of the rules and the description of other costs (both - 10 percentage points).

Official government reports (SOU)	Number		Number acceptable (%)
	Acceptable	Deficient	
Purpose	21	1	95%
Consistency with EU law	21	1	95%
Affected companies by industry	21	1	95%
Effects if no regulation is issued	20	2	91%
Particular attention to the date of entry into force	20	2	91%
Alternative solutions	18	4	82%
Provision of special information	18	4	82%
Effects in other respects	15	7	68%
Changes in business activities	14	8	64%
Number of companies affected	12	10	55%
Competitive impact	11	11	50%
Special attention for small businesses	11	11	50%
Size of the companies affected	11	11	50%
Other costs	10	12	45%
Administrative costs	3	19	14%

Figure 10: The Swedish Better Regulation Council's assessment by aspect, official government reports, 2019.

Results per aspect – government authority reports

A review of the Swedish Better Regulation Council's assessments per aspect among the impact assessments related to government authority reports reveals the following, for example:

- For this group too, the aspects of section 6 of the KUF are described in a relatively good way. If we disregard the need for specific information, the acceptable proportions are between 50 per cent (the proposal's conformity with EU law) and 100 per cent (description of background and purpose). The proportion of acceptable descriptions of the need for provision of special information is 33 per cent.
- With regard to the descriptions of aspects in section 7 of the KUF, the lowest proportion of acceptable partial descriptions is the description of the size of the companies affected, with a share of 17 per cent. The highest proportion of acceptable descriptions is the description of the affected companies' industry with a share of 100 per cent.
- When comparing with the 2018 results, it can be noted that there are improvements in whether special consideration needs to be given to small companies in the formulation of the rules (+ 23 percentage points), the competitive impact of the proposal (+ 22 percentage points) and the description of administrative costs (+ 19 percentage points). In the case of major deteriorations, these are conformity with EU law (- 50 percentage points) and if there is a need for specific information (- 31 percentage points).

Government authority reports		Number		Number acceptable (%)
Results per aspect and regulator	Acceptable	Deficient		
Purpose	6	0	100 %	
Affected companies by industry	6	0	100 %	
Alternative solutions	5	1	83 %	
Effects if no regulation is issued	5	1	83 %	
Particular attention to the date of entry into force	5	1	83 %	
Administrative costs	5	1	83 %	
Other costs	4	2	67 %	
Changes in business activities	4	2	67 %	
Effects in other respects	4	2	67 %	
Competitive impact	4	2	67 %	
Consistency with EU law	3	3	50 %	
Number of companies affected	3	3	50 %	
Special attention for small businesses	3	3	50 %	
Provision of special information	2	4	33 %	
Size of the companies affected	1	5	17 %	

Figure 11: The Swedish Better Regulation Council's assessment by aspect, government authority reports, 2019.

Results per aspect – administrative authorities

A review of the Swedish Better Regulation Council's assessments per aspect among the impact assessments related to administrative authorities reveals the following, for example:

- Like the other groups of regulators, the administrative authorities also describe the aspects of section 6 of the KUF relatively well. The acceptable proportions are between 81 per cent (the proposal's conformity with EU law) and 99 per cent (description of background and purpose).
- With regard to the descriptions of aspects in section 7 of the KUF, the lowest proportion of acceptable descriptions is the description of the size of the companies affected, with a share of 56 per cent. The description of the impact of the regulation on companies in other respects has the highest proportion of acceptable descriptions with a share of 83 per cent.
- When compared to the 2018 results, it can be noted that there is an improvement in the description of the impact of the proposal on the administrative costs of the companies concerned (+ 15 percentage points), as well as the description of other costs (+ 9 percentage points). The main deterioration is in terms of the description of the companies concerned by industry (- 17 percentage points); the other deteriorations amount to only a few percentage points.

Administrative authorities	Number		Number acceptable (%)
	Acceptable	Deficient	
Purpose	85	1	99 %
Effects if no regulation is issued	83	3	97 %
Particular attention to the date of entry into force	74	12	86 %
Alternative solutions	74	12	86 %
Effects in other respects	71	15	83 %
Provision of special information	71	15	83 %
Consistency with EU law	70	16	81 %
Affected companies by industry	64	22	74 %
Administrative costs	64	22	74 %
Special attention for small businesses	62	24	72 %
Changes in business activities	61	25	71 %
Number of companies affected	60	26	70 %
Other costs	59	27	69 %
Competitive impact	51	35	59 %
Size of the companies affected	48	38	56 %

Figure 12: The Swedish Better Regulation Council's assessment by aspect, administrative authorities, 2019.



Secretariat responses

If a proposal is not deemed to have effects of importance for companies, the Swedish Better Regulation Council does not comment on the matter, but instead responds to the submission with a so-called secretariat response. In addition to the impact of the proposal on companies, there are also a number of other reasons why a submission is answered with a secretariat response and the reason is always clear from the response. See p. 10 for more information on the different reasons for answering a submission with a secretariat response.

In 2019, the Swedish Better Regulation Council answered 157 submissions with secretariat responses.

- In 111 of the secretariat responses, corresponding to a 71 per cent share, the reason was limited effects for companies.
- In 9 of the secretariat responses, corresponding to a share of 6 per cent, the reason was resources.
- In 3 of the secretariat responses, corresponding to a share of 2 per cent, the reason was time.
- 34 of the secretariat responses, corresponding to a share of 22 per cent, came into the category other¹³.

Reason for secretariat responses	2019	
	Number	Proportion (%)
Limited effects	111	71 %
Resource reasons	9	6 %
Time reasons	3	2 %
Other	34	22 %
Total	157	100 %*

*The figures are rounded to the nearest percentage but total 100%.

Figure 13: Reason for secretariat responses, 2019.

¹³ The category other includes, for example, that the proposed statute is governed by superior legislation with no or very limited room for manoeuvre for the referring regulator.

Review of EU impact assessments

In 2019, no requests for review of an impact assessment drawn up at EU level were submitted to the Swedish Better Regulation Council. As shown above, this assignment is more resource-intensive than the review of national impact assessments, which is why it is particularly important that the opinions of the Swedish Better Regulation Council constitute concrete support to the referring Swedish proposer. In order to investigate the benefits of the opinions of the Swedish Better Regulation Council, during the period 2017–2018 a follow-up of the area was carried out¹⁴. The responses to the follow-up showed that there was no uniform view of the Swedish Better Regulation Council's reviews in this area and positive and negative comments were found. The regulators also had viewpoints on when in the process the Swedish Better Regulation Council should assist with scrutiny – but they have not agreed on whether the Swedish Better Regulation Council's review is currently done too early or too late. In each review of an impact assessment drawn up at EU level, the Swedish Better Regulation Council has concluded that a supplementary Swedish impact assessment needs to be drawn up and the clearest indication from the Swedish Better Regulation Council's follow-up was that no regulators had followed this recommendation.

The viewpoints received led the Swedish Better Regulation Council, together with the Swedish Agency for Economic and Regional Growth, to carry out an investigation into what each body should do or assist with and when in the process it should happen. The investigation was based on the viewpoints received, together with an outside view. The investigation concludes that since none of the regulators who have responded to the follow-up has created a supplementary impact assessment, the work of the Swedish Better Regulation Council has not been used as intended. The review as currently performed is therefore neither resource efficient nor formulated in the most appropriate way. The investigation shows that there should be a review and revision of the Swedish Better Regulation Council's review assignment in this respect.

The investigation also shows that the Government Offices of Sweden need to strengthen and improve the work of taking into account the consequences of EU proposals and that additional Swedish impact assessments need to be drawn up if necessary. The work on impact assessments needs to be strengthened, partly with resources for the responsible Swedish regulators and partly with relevant support for the Swedish regulators. On the part of the Swedish Better Regulation Council, it is proposed that the Swedish Better Regulation Council should instead examine the supplementary Swedish impact assessments, as well as the commission's proposal. In the latter respect, the review could focus on identifying elements of the proposal that may be particularly problematic for Swedish companies and which may therefore need further analysis.

The investigation led to a request with proposals that were submitted to the Ministry of Enterprise and Innovation in November 2019¹⁵.

¹⁴ See the Swedish Better Regulation Council's Annual Report for 2018, section 4 Follow-up, p. 28 for more information about the follow up.

¹⁵ Consequences of EU legislation The request after the follow-up and evaluation of the Swedish Better Regulation Council's assignment with regard to impact assessments created at EU level <https://www.regelradet.se/wp-content/uploads/2019/12/hemstallan-konsekvenser-av-eu-lagstiftning.pdf>



4

Reflections on the 2019 financial year

The Swedish Better Regulation Council notes that of the submissions received, the proportion of opinions is 50 per cent this year, which is comparable to 2018, but a higher percentage than in 2016 and 2017¹⁶. The statistics show that the proportion of acceptable impact assessments is 66 per cent, which is an improvement on previous years¹⁷. As this report shows, the results vary between the referring regulators.

The Government Offices of Sweden internally and administrative authorities have improved their results. It is positive that the Government Offices of Sweden internally have improved their results – at the same time it is not possible to say from a single year with certainty whether this is a lasting trend or only a variation¹⁸. The administrative authorities are instead back to the results they have had over the last four years, with one exception last year¹⁹. In the category of government authority reports, the result has deteriorated²⁰, but at the same time there are so few such submissions this year (six) that it is difficult to draw any far-reaching conclusions from the result. Official government reports have significantly worse results²¹, and for this group the number of submissions is two more than last year (22). However, if you look at the results over the past four years, it is last year's improvement that seems to be a variation.

The quality of official government reports needs to be improved

According to the Swedish Better Regulation Council, it is alarming that not even half of the 22 official government reports on which the Swedish Better Regulation Council has delivered its opinion have acceptable impact assessments. Official government reports are extensive official inquiries dealing with fundamental issues. A great deal of priority regulatory work starts with official government reports and it is therefore particularly important that costs and other consequences are carefully investigated at this stage of the process. In order to ensure that the most cost-effective solution has been chosen and that the effects on the companies concerned are well investigated prior to the entry into force of the legislation, prioritising the impact assessment work is central and of the utmost importance. According to the Swedish Better Regulation Council, significant emphasis needs to be placed on the impact assessment work in committees of inquiry, as these come early in the regulatory chain. If there is a good quality impact assessment for the proposals in an official government report, a good basis is laid for examining the consequences of future proposals for ordinances and regulations. As things stand, the situation seems to be the reverse – that government agencies, generally speaking, spend more time and involvement in the impact assessment work.

16 In 2018, 307 submissions were answered, of which 151 were with an opinion, corresponding to a 49% share. In 2017, 355 submissions were answered, of which 134 were with an opinion, corresponding to a 38% share. In 2016, 371 submissions to the Swedish Better Regulation Council were answered, of which 162 were with an opinion, corresponding to a 44% share.

17 Proportion of acceptable impact assessments in 2018: 56%, 2017: 57%, 2016: 52%, 2015: 36%.

18 Government Offices of Sweden internally, proportion of acceptable impact assessments 2019: 60%, 2018: 35%, 2017: 31%, 2016: 19%, 2015: 13%.

19 Administrative authorities, proportion of acceptable impact assessments in 2019: 77%, 2018: 62%, 2017: 79%, 2016: 77%, 2015: 49%.

20 Government authority reports, proportion of acceptable impact assessments in 2019: 50%, 2018: 82%, 2017: 82%, 2016: 41%, 2015: 20%.

21 Official government reports, proportion of acceptable impact assessments in 2019: 41%, 2018: 65%, 2017: 39%, 2016: 41%, 2015: 27%.

The investigation directives should have a more open formulation

Another fundamental factor affecting the quality of impact assessments is the investigation directives sent to committees of inquiry and the official inquiries that the government ministries perform themselves or give to administrative authorities. The Swedish Better Regulation Council has noted that these are often narrow and well defined, which means that the solution is already predetermined. The scope for making alternative proposals that may entail a lower regulatory burden for companies is thus limited. Even if an order is submitted to investigate a particular issue, the directives and assignments need to be written in such a way that it is possible to propose the solution that the investigator has found to be most appropriate after a review. It is therefore important that the terms of reference and the assignments are formulated in such a way that a certain direction or solution is not always determined in advance, without giving the committee or the authority the opportunity to investigate the matter without preconditions.

Resources and competences are necessary for thorough impact assessments

The Swedish Better Regulation Council has long stressed that sufficient time and resources need to be allocated to the impact assessment work and also that the impact assessment work should begin in good time. The Swedish Better Regulation Council has noted that the time available to committees of inquiry has been consistently narrowed, limiting the scope for impact assessment in a proper manner. This risks affecting the quality of the impact assessment.

According to the Swedish Better Regulation Council, it is also a major problem that there is no support for committees of inquiry in the form of statisticians and economists, who can carry out the necessary calculations of the costs incurred as a result of the proposals, and how the companies concerned are affected by them. An optimal solution would be for there to be a secretariat of specialists associated with the committee to provide relevant support. The Swedish Better Regulation Council can also see a lack of coordination between government ministries as a factor that is relevant to the performance of the committees of inquiry. Since each ministry places its own orders, there is no one who takes collective responsibility and captures the needs of official inquiries in terms of impact assessment in a more integrated way.

Furthermore, there is a difference in the conditions between the work done internally in the government ministries and in committees of inquiry. The work done internally in the government ministries can be compared to the work done by an administrative authority – there is an internal learning process. Committees of inquiry, on the other hand, work for a limited time on a particular issue. At the time of referral of the proposal, the committee has ceased its work, unless it is an interim report that has been submitted. There is therefore no possibility of supplementing a deficient impact assessment or learning for the future.

Impact assessments must be carried out early for good effect in the regulatory process

The Swedish Better Regulation Council has been saying for several years that there should be an opportunity to review the quality of impact assessments at an earlier stage. In view of these reasons, this would be particularly relevant for committees of inquiry. Such a system would provide the necessary conditions for the committee to take into consideration the opinion of the Swedish Better Regulation Council and, if necessary, supplement the impact assessment before the normal consultation round. This also ties in closely with the Swedish Better Regulation Council's view that the expected consequences of a proposal should be identified and investigated as early as possible in the regulatory chain, in order to take into account, where possible, the effectiveness of different solutions that may involve alternative formulations of regulations, or instruments that do not involve regulation.

The EU impact assessment process needs to be renewed

As has been shown earlier, see the section on the Review of EU impact assessments, the Swedish Better Regulation Council considers that the current mandate to the Swedish Better Regulation Council in this regard does not fulfil its purpose and needs to be amended. The Swedish Better Regulation Council proposes that there should be requirements for additional Swedish impact assessments for EU proposals to be drawn up. These impact assessments should be examinable by the Swedish Better Regulation Council. It is also proposed that the Swedish Better Regulation Council enters the process earlier and is given the task of reviewing the European Commission's proposal, in order to identify parts of the proposal that may be particularly problematic for Swedish companies and which therefore need to be further analysed.

Digital tools for standardised information need to be developed

The Swedish Better Regulation Council has also noted that regulators have obvious challenges in finding the information that is necessary so as to be able to present in a sufficiently clear way the expected consequences of a proposal. The difficulties involved may mean that the most effective solutions are not proposed, as the consequences have not been investigated to the necessary extent. For this reason, the Swedish Better Regulation Council considers that digital tools need to be developed in order to allow regulators easy access to relevant data needed in the impact assessment work. This would lead to more effective investigative work with better-researched proposals as a result.

The impact assessment work needs a review

In addition, the Swedish Better Regulation Council considers that there is a need for an objective review of impact assessment work in Sweden to ensure that this work is carried out effectively through the regulatory process. In 2010, the OECD presented a report with a review of the Swedish regulatory simplification work, which included a survey of role distribution between different Swedish bodies and recommendations on how the Swedish process could be improved. A new, similar review carried out by the OECD could therefore be expected to provide valuable insights for continued improvement work on the consequences of the rules in Sweden.

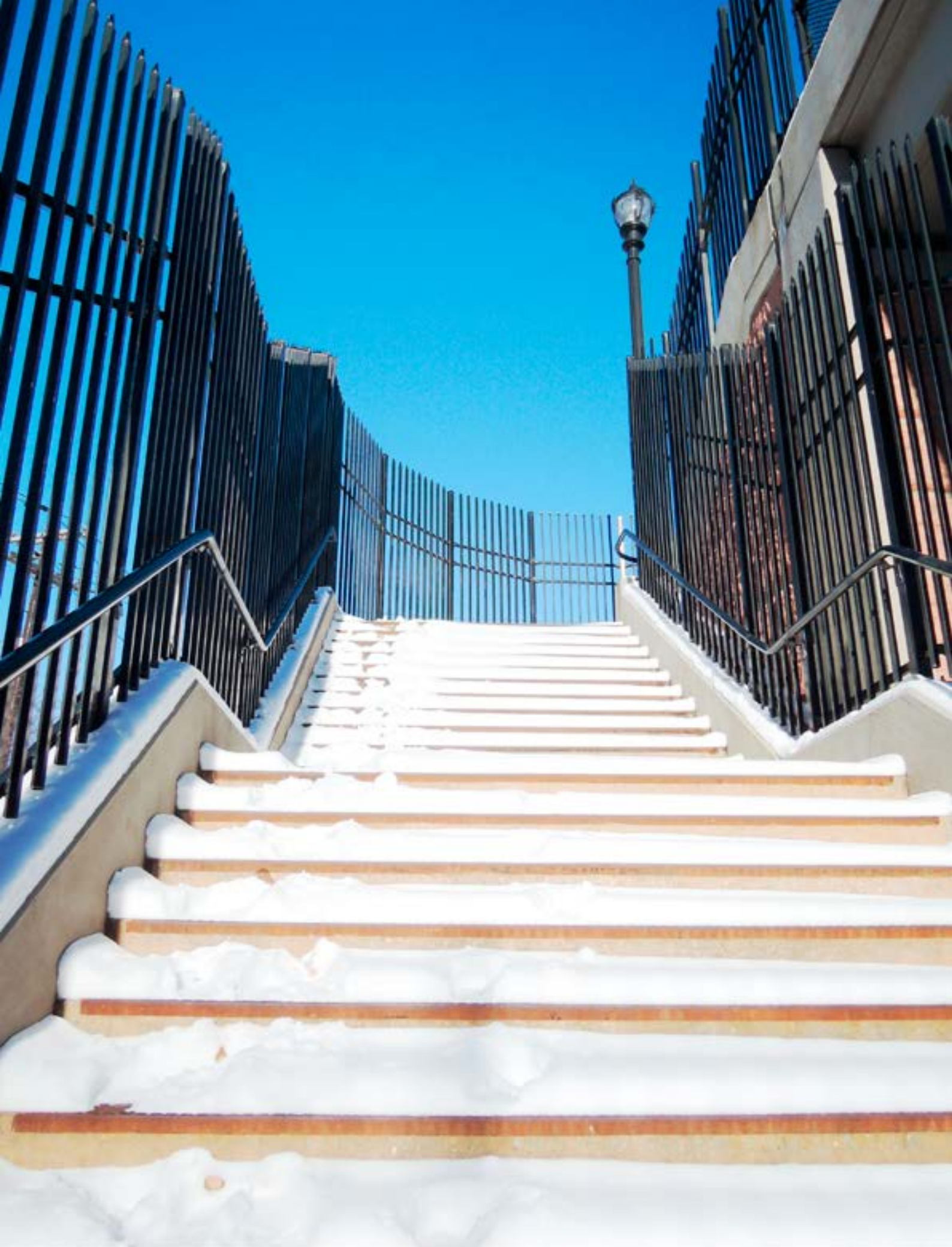


Table Appendix

Opinions of the Swedish Better Regulation Council in 2019 by referring body and type of submission (assessment of impact assessment as a whole and per aspect)

Table 1 Government Offices of Sweden (produced internally)

G=Acceptable, B=Deficient

Proposer	Overall assessment		Purpose		Alternative solutions		Effects if no regulation is issued		Consistency with EU law		Particular attention to the date of entry into force		Need for provision of special information	
	Met the requirements	Did not meet the requirements	G	B	G	B	G	B	G	B	G	B	G	B
<i>Ministry</i>														
Ministry of Employment	1	0	1	0	1	0	1	0	1	0	1	0	1	0
Ministry of Finance	14	9	23	0	17	6	19	4	18	5	18	5	13	10
Ministry of Infrastructure	3	2	5	0	3	2	5	0	4	1	4	1	2	3
Ministry of Justice	3	2	5	0	5	0	5	0	5	0	5	0	4	1
Ministry of the Environment and Energy	0	1	1	0	1	0	0	1	1	0	1	0	0	1
Ministry of the Environment	2	0	2	0	1	1	1	1	1	1	2	0	2	0
Ministry of Enterprise and Innovation	0	1	1	0	0	1	1	0	0	1	1	0	0	1
Ministry of Health and Social Affairs	1	1	2	0	1	1	1	1	1	1	1	1	1	1
Total	24	16	40	0	29	11	33	7	31	9	33	7	23	17

Table 2 Official government reports

G=Acceptable, B=Deficient

Proposer	Overall assessment		Purpose		Alternative solutions		Effects if no regulation is issued		Consistency with EU law		Particular attention to the date of entry into force		Need for provision of special information	
	Met the requirements	Did not meet the requirements	G	B	G	B	G	B	G	B	G	B	G	B
<i>Ministry</i>														
Ministry of Employment	1	0	1	0	1	0	1	0	1	0	1	0	1	0
Ministry of Finance	1	4	4	1	3	2	4	1	5	0	4	1	3	2
Ministry of Defence	0	1	1	0	1	0	1	0	1	0	1	0	1	0
Ministry of Infrastructure	1	0	1	0	1	0	1	0	1	0	1	0	1	0
Ministry of Justice	0	2	2	0	2	0	2	0	2	0	2	0	2	0
Ministry of Culture	0	1	1	0	1	0	0	1	1	0	1	0	1	0
Ministry of Enterprise and Innovation	3	0	3	0	3	0	3	0	3	0	3	0	3	0
Ministry of Health and Social Affairs	1	3	4	0	3	1	4	0	3	1	3	1	3	1
Ministry of Education and Research	2	2	4	0	3	1	4	0	4	0	4	0	3	1
Total	9	13	21	1	18	4	20	2	21	1	20	2	18	4

	Number of companies		Size of company		Industry sector		Administrative costs		Other costs		Companies' business activities		Competitive conditions		Other respects		Special attention for small businesses	
	G	B	G	B	G	B	G	B	G	B	G	B	G	B	G	B	G	B
	1	0	1	0	1	0	0	1	1	0	1	0	1	0	1	0	1	0
	14	9	8	15	19	4	16	7	14	9	14	9	14	9	22	1	12	11
	4	1	3	2	4	1	2	3	2	3	4	1	3	2	4	1	2	3
	4	1	3	2	4	1	3	2	3	2	3	2	3	2	4	1	3	2
	1	0	0	1	1	0	0	1	1	0	0	1	0	1	0	1	1	0
	2	0	1	1	2	0	1	1	2	0	1	1	1	1	2	0	0	2
	0	1	0	1	1	0	0	1	0	1	0	1	0	1	1	0	0	1
	1	1	1	1	1	1	0	2	1	1	1	1	1	1	2	0	1	1
	27	13	17	23	33	7	22	18	24	16	24	16	23	17	36	4	20	20

	Number of companies		Size of company		Industry sector		Administrative costs		Other costs		Companies' business activities		Competitive conditions		Other respects		Special attention for small businesses	
	G	B	G	B	G	B	G	B	G	B	G	B	G	B	G	B	G	B
	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0
	1	4	1	4	5	0	0	5	2	3	2	3	2	3	4	1	3	2
	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1
	0	1	0	1	1	0	0	1	1	0	1	0	1	0	1	0	1	0
	1	1	1	1	2	0	0	2	0	2	1	1	1	1	0	2	0	2
	1	0	1	0	1	0	0	1	0	1	1	0	0	1	1	0	1	0
	3	0	3	0	3	0	2	1	3	0	3	0	3	0	3	0	2	1
	2	2	2	2	4	0	0	4	1	3	3	1	1	3	2	2	1	3
	3	1	2	2	4	0	0	4	2	2	2	2	2	2	3	1	2	2
	12	10	11	11	21	1	3	19	10	12	14	8	11	11	15	7	11	11

Table 3 Government authority reports

G=Acceptable, B=Deficient

Proposer	Overall assessment		Purpose		Alternative solutions		Effects if no regulation is issued		Consistency with EU law		Particular attention to the date of entry into force	
	Met the requirements	Did not meet the requirements	G	B	G	B	G	B	G	B	G	B
<i>Referring ministry and responsible administrative authority</i>												
Ministry of Finance/Swedish Tax Agency	0	1	1	0	1	0	1	0	0	1	1	0
Ministry of Infrastructure/National Board of Housing, Building and Planning	0	1	1	0	1	0	1	0	0	1	1	0
Ministry of Infrastructure/ Swedish National Board of Housing, Building and Planning and the Swedish Energy Agency	0	1	1	0	0	1	0	1	0	1	1	0
Ministry of Infrastructure/Swedish Transport Administration	1	0	1	0	1	0	1	0	1	0	1	0
Ministry of Infrastructure/Swedish Transport Agency	1	0	1	0	1	0	1	0	1	0	0	1
Ministry of Enterprise and Innovation/Swedish Companies Registration Office and Swedish Agency for Economic and Regional Growth	1	0	1	0	1	0	1	0	1	0	1	0
Total	3	3	6	0	5	1	5	1	3	3	5	1

Table 4 Administrative authorities

G=Acceptable, B=Deficient

Proposer	Overall assessment		Purpose		Alternative solutions		Effects if no regulation is issued		Consistency with EU law		Particular attention to the date of entry into force	
	Met the requirements	Did not meet the requirements	G	B	G	B	G	B	G	B	G	B
<i>Administrative authority</i>												
Swedish Work Environment Authority	0	1	1	0	0	1	0	1	0	1	0	1
National Board of Housing, Building and Planning	2	1	3	0	3	0	3	0	2	1	3	0
Energy Markets Inspectorate	1	2	3	0	2	1	3	0	3	0	3	0
Swedish Energy Agency	1	0	1	0	1	0	1	0	1	0	1	0
Estate Agents Inspectorate	0	1	1	0	0	1	1	0	0	1	0	1
Swedish Financial Supervisory Authority	6	0	6	0	5	1	6	0	5	1	5	1
Public Health Agency	0	3	3	0	2	1	3	0	3	0	1	2
Swedish Social Insurance Agency	1	0	1	0	1	0	1	0	1	0	1	0
Swedish Agency for Marine and Water Management	4	3	7	0	6	1	7	0	7	0	7	0
Swedish Board of Agriculture	8	0	8	0	7	1	8	0	8	0	8	0
Swedish Consumer Agency	0	1	1	0	1	0	1	0	1	0	1	0
National Food Administration	1	0	1	0	1	0	1	0	1	0	1	0
Medical Products Agency	0	1	1	0	1	0	1	0	1	0	1	0
County Administrative Board of Västra Götaland	1	0	1	0	1	0	1	0	1	0	0	1
Digital Administration Authority	0	1	1	0	1	0	1	0	1	0	0	1
Swedish Broadcasting Authority	1	0	1	0	1	0	1	0	1	0	1	0
Swedish Civil Contingencies Agency	2	0	2	0	2	0	2	0	2	0	1	1
Swedish Environmental Protection Agency	3	1	4	0	4	0	4	0	4	0	3	1
Patent Board	0	1	0	1	0	1	0	1	0	1	1	0
Swedish Post and Telecom Authority	1	1	2	0	2	0	2	0	2	0	2	0
Audit Inspectorate	0	1	1	0	0	1	0	1	1	0	1	0
Swedish National Debt Office	0	1	1	0	0	1	1	0	0	1	1	0
Swedish Maritime Administration	3	0	3	0	2	1	3	0	3	0	3	0
Swedish Forest Agency	1	0	1	0	1	0	1	0	1	0	1	0
National Agency for Education	1	0	1	0	1	0	1	0	1	0	1	0
Statistics Sweden	7	0	7	0	6	1	7	0	7	0	6	1
Dental and Pharmaceutical Benefits Agency	1	0	1	0	1	0	1	0	1	0	1	0
Swedish Agency for Economic and Regional Growth	1	0	1	0	1	0	1	0	1	0	1	0
Swedish Transport Administration	15	0	15	0	15	0	15	0	8	7	13	2
Swedish Transport Agency	5	1	6	0	6	0	6	0	3	3	6	0
Total	66	20	85	1	74	12	83	3	70	16	74	12

	Need for provision of special information		Number of companies		Size of company		Industry sector		Administrative costs		Other costs		Companies' business activities		Competitive conditions		Other respects		Special attention for small businesses	
	G	B	G	B	G	B	G	B	G	B	G	B	G	B	G	B	G	B	G	B
	0	1	1	0	0	1	1	0	1	0	1	0	0	1	1	0	0	1	0	1
	0	1	1	0	0	1	1	0	1	0	1	0	1	0	0	1	1	0	0	1
	1	0	0	1	0	1	1	0	0	1	0	1	1	0	0	1	0	1	0	1
	0	1	0	1	0	1	1	0	1	0	1	0	1	0	1	0	1	0	1	0
	0	1	0	1	0	1	1	0	1	0	0	1	0	1	1	0	1	0	1	0
	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0
	2	4	3	3	1	5	6	0	5	1	4	2	4	2	4	2	4	2	3	3

	Need for provision of special information		Number of companies		Size of company		Industry sector		Administrative costs		Other costs		Companies' business activities		Competitive conditions		Other respects		Special attention for small businesses	
	G	B	G	B	G	B	G	B	G	B	G	B	G	B	G	B	G	B	G	B
	1	0	1	0	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1
	2	1	2	1	2	1	3	0	2	1	2	1	2	1	3	0	2	1	2	1
	2	1	2	1	1	2	3	0	2	1	0	3	0	3	1	2	2	1	2	1
	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0
	1	0	0	1	0	1	1	0	0	1	0	1	0	1	0	1	0	1	0	1
	4	2	6	0	3	3	6	0	6	0	5	1	4	2	6	0	6	0	6	0
	3	0	2	1	2	1	2	1	0	3	0	3	0	3	0	3	0	3	2	1
	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0
	7	0	6	1	6	1	7	0	5	2	3	4	4	3	6	1	6	1	4	3
	4	4	8	0	6	2	8	0	8	0	7	1	8	0	8	0	7	1	6	2
	1	0	1	0	1	0	1	0	0	1	0	1	1	0	0	1	0	1	0	1
	1	0	1	0	1	0	1	0	0	1	1	0	1	0	1	0	1	0	1	0
	1	0	1	0	0	1	1	0	1	0	0	1	0	1	0	1	1	0	0	1
	0	1	1	0	1	0	1	0	1	0	1	0	1	0	0	1	1	0	0	1
	0	1	1	0	1	0	1	0	0	1	0	1	1	0	0	1	1	0	0	1
	1	0	1	0	0	1	1	0	0	1	0	1	0	1	1	0	1	0	1	0
	2	0	2	0	2	0	2	0	2	0	2	0	2	0	2	0	2	0	2	1
	3	1	1	3	2	2	3	1	3	1	3	1	2	2	2	2	3	1	3	1
	1	0	0	1	0	1	1	0	0	1	0	1	0	1	0	1	0	1	0	1
	2	0	2	0	2	0	2	0	1	1	2	0	2	0	1	1	2	0	1	1
	1	0	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1
	0	1	1	0	0	1	1	0	0	1	0	1	0	1	0	1	0	1	1	0
	3	0	3	0	2	1	3	0	2	1	3	0	3	0	3	0	3	0	3	0
	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0
	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0
	6	1	7	0	7	0	6	1	5	2	7	0	6	1	6	1	7	0	7	0
	1	0	1	0	0	1	1	0	1	0	1	0	1	0	1	0	1	0	1	0
	1	0	1	0	1	0	0	1	1	0	0	1	0	1	1	0	1	0	1	0
	15	0	0	15	0	15	0	15	15	0	15	0	15	0	0	15	15	0	13	2
	4	2	5	1	4	2	5	1	5	1	3	3	4	2	5	1	5	1	3	3
	71	15	60	26	48	38	64	22	64	22	59	27	61	25	51	35	71	15	62	24

The Swedish Better Regulation Council is a specific decision-making body within the Swedish Agency for Economic and Regional Growth whose members are appointed by the government. The Swedish Better Regulation Council is responsible for its own decisions. The task of the Swedish Better Regulation Council is to review and express an opinion on the quality of impact assessments for proposed statutes that may have an impact on business.

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