



Annual Report

2021

Regel|rådet



Regel|rådet

Annual Report **2021**

Contents

Foreword	3
Summary	4
Introduction	6
1. Reviews in practice	8
2. International collaboration	12
3. Reviews in figures	14
Opinions	14
Secretariat responses	25
Review of impact assessments drawn up at EU level	26
4. Impact of the COVID-19 pandemic on the work of the Swedish Better Regulation Council	28
5. Reflections on the 2021 financial year	30
Table appendix	32

Foreword

The Swedish Better Regulation Council (Regelrådet) has had a more normal year this year compared to 2020. It has been possible to carry out its activities as planned. However, we remain on high alert to deal as well as possible with cases related to the COVID-19 pandemic, if needed.

The compliance rate for impact assessments this year is around 60 per cent, which is an improvement compared to 2020, but it is difficult to determine whether this is a lasting improvement. However, it has to be said that the percentage of approved impact assessments is at too low a level. The aspects of the impact assessment that are consistently most deficient are the number and size of companies affected, the impact on competition, administrative and other costs, and special attention for small businesses. One consequence of this is that regulatory decisions are taken without sufficient knowledge of the impact on companies.

In its 2019 Annual Report, the Council made a number of proposals to improve impact assessments in regulatory work, both in Sweden and at EU level. These were followed up in the 2020 Annual Report. Unfortunately, I have to say that there have been no improvements in relation to our proposals in 2021, compared to the previous year, except that the impact assessment process needs to be reviewed. During the year, the Inquiry on a simpler regulatory framework for micro-enterprises and a modernised accounting act has proposed a number of measures to improve the work on impact assessments, which is a positive development. The Government has also submitted written communication to Parliament on new regulatory simplification targets. Among other things, it emphasises the importance of high quality impact assessments. I can only agree with this.

I would like to thank Elisabeth Thand Ringqvist and Samuel Engblom for their efforts as Chairs of the Council in 2021. I would also like to thank Hanna Björknäs and Cecilia Gunne, who stepped down as ordinary members during the year. I would also like to welcome Anna-Lena Bohm as an ordinary member.



Claes Norberg
Deputy Chair of the Swedish Better Regulation Council

Summary

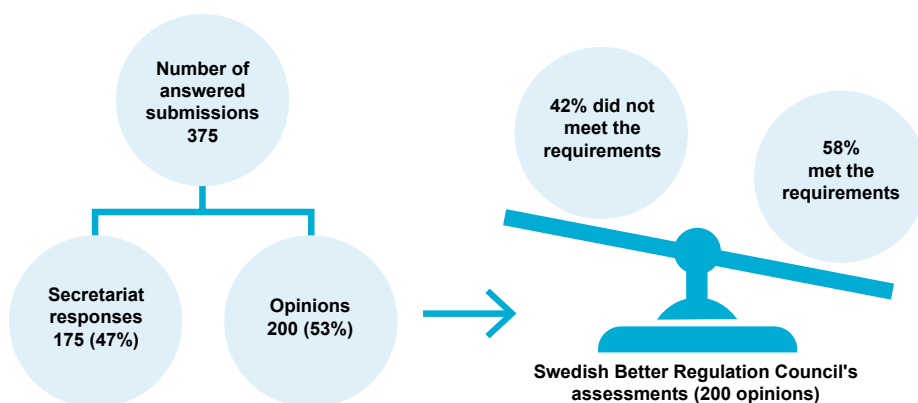
Swedish Better Regulation Council

Who? The Swedish Better Regulation Council is a designated decision-making body. The Council consists of five members appointed by the Government.

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

Answered submissions



Distribution of opinions 2021

Government Offices of Sweden

72 submissions

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

Official government reports (SOU)

38 submissions

- 55% met the requirements
- 45% did not meet the requirements

Government authority reports

12 submissions

- 25% met the requirements
- 75% did not meet the requirements

Government authority regulations

78 submissions

- 72% met the requirements
- 28% did not meet the requirements



Regel|rådet

Annual Report **2021**

Introduction

The Swedish Better Regulation Council's mandate

The Swedish Better Regulation Council is a specific decision-making body tasked with reviewing impact assessments for 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 is referred to the Swedish Better Regulation Council. The 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 as KUF. The Council also reviews impact assessments created at EU level, at the request of the relevant Swedish government ministry or agency.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.

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 Council was organised as a committee. In 2015, the activities of the 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.

Composition and organisation of the Swedish Better Regulation Council

The Council consists of a chair, a deputy chair and three ordinary members. Elisabeth Thand Ringqvist served as chair until autumn 2021. Samuel Engblom then served as chair between October and December 2021. Claes Norberg is deputy chair, and Anna-Lena Bohm, Hans Peter Larsson and Lennart Renbjör are ordinary members.² The alternate members are Hanna Björknäs, Lars Silver and Marie-Louise Strömgren.

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

Content of the report

This is the thirteenth annual report of the Swedish Better Regulation Council that summarises the statistics on matters submitted to the Council and other activities of the Council in 2021.

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 Hanna Björknäs was an ordinary member until April 2021, when she was replaced by Cecilia Gunne. Cecilia Gunne was an ordinary member until December 2021, when she was replaced by Anna-Lena Bohm as ordinary member.

Swedish Better Regulation Council



Elisabeth Thand Ringqvist
chair until autumn 2021



Samuel Engblom
chair between October and December 2021



Claes Norberg
deputy chair



Hanna Björknäs
member until April 2021



Cecilia Gunne
member until December 2021



Anna-Lena Bohm
member



Hans Peter Larsson
member



Lennart Renbjer
member



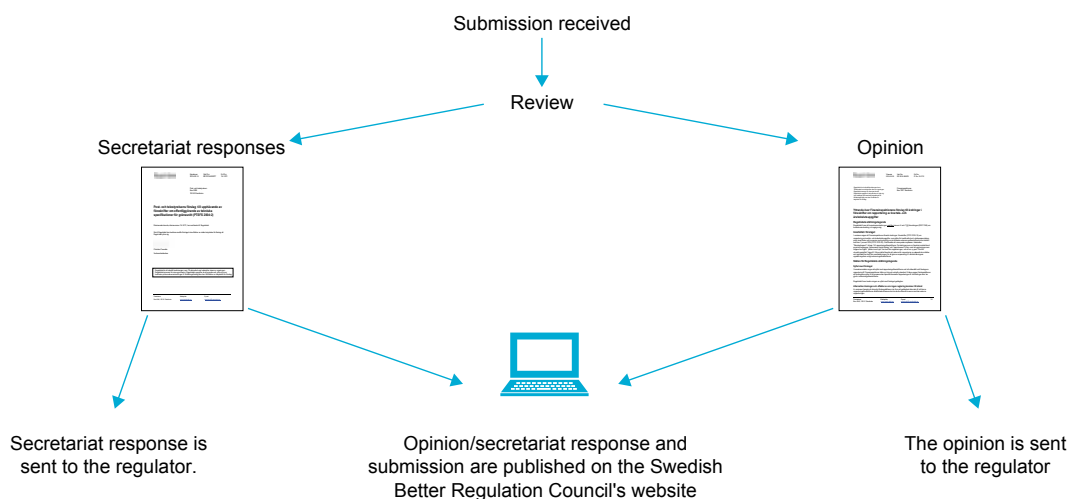
Christian Pousette
director

1

Reviews in practice

Government ministries and authorities shall refer proposals for new and amended regulations that may have a significant impact on business to the Swedish Better Regulation Council. For government authorities, this is governed by the Ordinance (2011:118) about collection of opinions by government authorities from the Swedish Better Regulation Council, and for government ministries in guidelines for the submission of documentation to the Swedish Better Regulation Council by the Government Offices of Sweden.

When a submission is received by the Council, the first assessment is whether the submission should be answered with an opinion or a secretariat response. A secretariat response means that the Council does not give an opinion on the submitted proposal. The secretariat response sets out the reason for this. See also the section Secretariat responses. The deciding factor for the assessment is whether the proposal could have effects of such significance for business that the Council should issue an opinion. Effects of significance for business include both economic and other effects. If the proposal is deemed to have effects of significance for business, or if the effects cannot be assessed, the 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 as clear assessments as possible, since the opinions of the 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 aim of this is to improve the quality of future impact assessments, which will hopefully result in making the effects of the regulations coming into force better researched and known than they would have been with a poorer quality impact assessment.

The Council's opinion first states its position on the impact assessment as a whole, i.e. whether the Council finds that the impact assessment meets or fails to meet the requirements of Sections 6 and 7 of the KUF. This is done to ensure that the reader can directly see the Council's view of the impact assessment. The contents of the submission are then described, followed by the paragraphs of 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 Council's overall assessment. Under this heading, the outcome of all the points of the proposer's impact assessment is compiled into a final assessment. The final assessment is that the impact assessment meets or fails to meet the requirements laid out in Sections 6 and 7 of the KUF.

The aspects that the Council uses as the basis for its impact assessment reviews are described below.

Aspects of the impact assessment that the Council reviews

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

1. Purpose of the proposal
2. Alternative solutions
3. Effects if no regulation is issued
4. The proposal's consistency 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' business activities
13. Impact 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 a secretariat response

Limited effects for companies: The proposal is deemed to not have effects of such significance for business that the Council should issue an opinion. This is the most common reason for a secretariat response.

Resource constraints: It may be that the number of cases exceeds the amount that can be handled by available human resources. The Council therefore needs to prioritise commenting on the submissions with the greatest significance for companies.

Time constraints: According to the Ordinance (2011:118) about collection of opinions by government authorities from the Swedish Better Regulation Council and Guidelines for the submission of documentation to the Council by the Government Offices of Sweden, the Council shall be allowed a response time of at least two weeks to answer a submission. If the proposer gives a shorter time, the Council will request an extended response time. If this is not possible for the proposer, the submission is answered with a secretariat response.³

Other reasons for a secretariat response: One example is that no statute text was submitted to the Council. This category also includes submissions covered by Section 7 of the Fee Regulation (1992:191), which means that the KUF is not applicable, as well as submissions for which decisions on regulations have been taken before the submission to the Council.

Review of impact assessments drawn up at EU level

At the request of regulators, the Swedish Better Regulation Council is also tasked with issuing opinions on impact assessments concerning proposals for regulations drawn up to EU level that are deemed to have a major impact on business in Sweden. The Council's mandate in such cases differs from the mandate regarding the review of impact assessments prepared by a Swedish proposer. Opinions on EU impact assessments do not give judgments on whether or not the impact assessment meets the requirements. They instead discuss the elements included in the EU impact assessment and whether a supplementary impact assessment needs to be drawn up to highlight the effects of the proposal on business in Sweden and which aspects need to be specifically reviewed in this. So far, the Council has recommended in all opinions that a supplementary impact assessment should be drawn up by the Swedish regulator. The review of impact assessments drawn up 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 website⁴ that provides information about its opinions, secretariat responses and activities in general. There is also a statistics page where you can compare the results between different regulators. There were approximately 12,000 visitors to the Council's website in 2021. The Council's newsletter, *Regelrätt*, is published six times a year. *Regelrätt* contains information about some of the Council's opinions, as well as an interview with a person who is currently prominent in the field of impact assessment. *Regelrätt* currently has about 750 subscribers. Subscribers may be people working in government authorities or ministries, organisations or others interested in the activities of the Council.

³ There are some exceptions to this.

⁴ www.regelradet.se

Evaluation of the Council's opinions

As part of a development project, the Council began evaluating its opinions in the autumn of 2021. The Council aims to gain an understanding of whether the opinions are of concrete use to the recipients or how they could otherwise be made more useful. Evaluation relates to both the form and content of the opinions. The evaluation process is ongoing, and the Council has obtained valuable perspectives from the recipients (government authorities and ministries) consulted so far.



2

International collaboration



Swedish Better Regulation Council (SBRC), Sweden • Danish Business Regulation Forum (DBRF), Denmark

Council of Regulatory Impact Analysis (FCRIA), Finland

Advisory Board on Regulatory Burden (ATR), the Netherlands • Norwegian Better Regulation Council (NBRC), Norway

Regulatory Policy Committee (RPC), United Kingdom

Regulatory Impact Assessment Board (RIAB), Czech Republic • National Regulatory Control Council (NKR), Germany

The Swedish Better Regulation Council is a member of RegWatchEurope (RWE), a network of independent review bodies. The overall objective of the network is to promote regulatory improvement at national and global level through exchange of experience and advocacy. The focus is on impact assessment and evaluation of regulations.

The review bodies of RWE have different mandates and resources, which means that their functions vary. They all review regulatory impact. Some member bodies mainly review only business impact, while others also review other aspects, such as the impact of regulations on the national economy, the environment and social conditions. One body reviews the quality of ex-post evaluations of existing regulations. Most have ongoing dialogues with – and provide support to – regulators.

In 2021, the Norwegian Better Regulation Council chaired RWE. Two steering group meetings and two meetings at the secretariat level meetings were held during the year. The RWE organised five workshops dealing with strategic business intelligence, regulation of new technologies, implementation of EU legislation, cost monitoring and impact of review, respectively. One workshop was organised jointly with the OECD. Each workshop was attended by around 30 representatives from RWE's review bodies, other countries' review bodies, the European Commission's Regulatory Scrutiny Board and the OECD's Regulatory Policy Committee.

The RWE's other activities in 2021 include ongoing contacts with European Commission Vice President Maroš Šefčovič, who is also the Commissioner responsible for Better Regulation. These dialogues resulted in, among other things, a joint high-level conference in December on regulatory simplification, with around 200 participants from the EU institutions (European Commission,

European Parliament, European Council, Court of Auditors, Committee of the Regions and Economic and Social Committee), RWE and Member States. Building on the Commission's April 2021 Better Regulation Communication, The conference aimed in particular to secure the commitment of the Council and Parliament in the 2016 inter-institutional agreement to examine the impact of major proposed amendments to the Commission's legislative proposals, something that is not currently done. The main conclusion from the conference was that EU legislation needs to be clearer, more coherent and more effectively implemented in the Member States. Representatives from the Council and the Parliament acknowledged that they need to get better at carrying out impact assessments and highlighted the need for a greater focus on this in the future.

In its Better Regulation Communication, the European Commission announces a number of measures, such as:

- Improving the consultation process through fewer open consultations.
- The “one in, one out” principle, whereby the cost of each new piece of legislation introduced is offset by the removal of corresponding costs in the same policy area, will start to be applied as early as the second half of 2021.
- A more systematic application of SME tests will take place. Member States are invited to report on possible over-implementation in the implementation of EU legislation and to provide feedback on the costs and benefits of specific legislative acts after they are implemented, to be used for subsequent evaluations and revisions.
- Evaluations at EU level should compare the initially estimated costs and benefits with the actual results. A better distinction should be made between implementation reports and evaluation reports. Evaluations should focus more on whole policy areas rather than individual pieces of legislation, taking into account the overall impact, possible overlaps and inconsistencies.

All impact assessment, consultation and evaluation processes should explicitly include environmental and digital aspects through the principles of “do no significant harm” and “digital by default”.

In its opinion on the Commission Communication, RWE agrees with most of the Commission's proposals. However, in some areas, RWE would like to go further. For example, the Commission only commits to fully compensate administrative costs in the framework of “one in, one out” and to only consider how other costs could be compensated. RWE believes that the commitment to full compensation should also cover other compliance costs, whether one-off or annual, as these are often more burdensome than administrative costs. In its opinion, RWE also calls on Member States to carry out more national impact assessments for EU proposals. RWE would also like to see an even broader mandate for the Regulatory Scrutiny Board, particularly as regards the possibility of reviewing the Commission's decision on whether or not to carry out an impact assessment.

RWE also commented on the OECD's Regulatory Policy Outlook 2021, a study carried out every three years that includes a ranking of how well OECD member states are implementing OECD recommendations on better legislation. The assessment is based on various indicators around impact assessment, consultation and evaluation. RWE notes that the study is valuable in a number of ways, not least for reporting on good practice and common challenges. In particular, RWE underscores the need for Member States to strengthen their overall impact assessment, consultation and evaluation processes, including the allocation of sufficient resources, and the important role that review bodies can play in and contribute to this work.

Contacts and exchanges of experience with counterparts in other countries and international institutions provide valuable insights for the Swedish Better Regulation Council on the challenges and possible solutions for reporting and reviewing regulatory impact. Given the increasing complexity of legislation, its cross-border nature and global opportunities and challenges for both businesses and regulators, international cooperation will become increasingly important.

3

Reviews in figures

In 2021, the Swedish Better Regulation Council dealt with 375 submissions. Of these, 200 resulted in an opinion (representing 53 per cent) and 175 resulted in a secretariat response (representing 47 per cent).

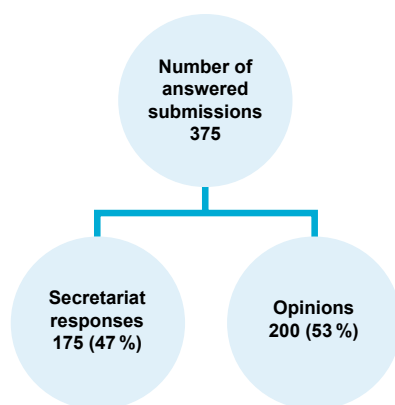


Figure 1: Answered submissions 2021.

Opinions

Of the 200 cases on which the Council issued an opinion, 116 contained an impact assessment that was deemed overall to meet the requirements of Sections 6 and 7 of the KUF, representing 58 per cent. The result is an improvement compared to 2020, when 53 per cent of the impact assessments were considered to meet the requirements.

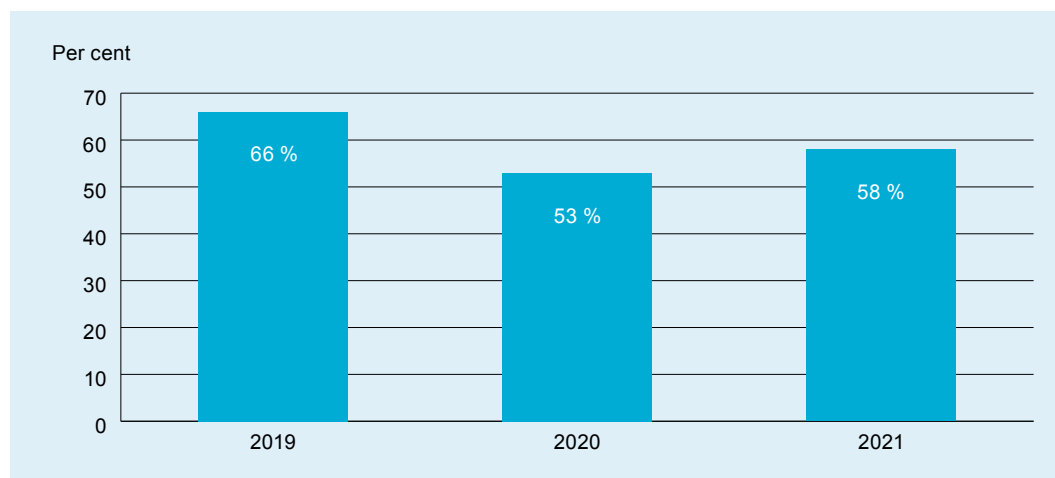


Figure 2: The Council's evaluation of impact assessments in 2019, 2020 and 2021; proportion that met the requirements.

Results by aspect

Aspect	2021		
	Number		Proportion acceptable (%)
	Acceptable	Deficient	
Purpose	197	3	99 %
Effects if no regulation is issued	193	7	97 %
Consistency with EU law	184	16	92 %
Affected companies by industry	182	18	91 %
Particular attention to the date of entry into force	180	20	90 %
Alternative solutions	176	24	88 %
Effects in other respects	154	46	77 %
Changes in business activities	148	52	74 %
Provision of special information	138	62	69 %
Number of companies affected	130	70	65 %
Other costs	130	70	65 %
Special attention for small businesses	112	88	56 %
Administrative costs	110	90	55 %
Impact on competition	108	92	54 %
Size of the companies affected	86	114	43 %

Figure 3: The Council's evaluation per aspect 2021, 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 the desired objective of the regulation (99%),
- Effects if no regulation is issued (97%),
- Consistency with EU law (92%),
- Affected companies by industry (91%),
- Particular attention to the date of entry into force (90%),
- Alternative solutions (88%),
- Effects in other respects (77%),
- Changes in business activities (74%), and
- Provision of special information (69%).

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

- Size of the companies affected (43 %)
- Impact on competition (54 %),
- Administrative costs (55 %),
- Special attention for small businesses (56 %),
- Number of companies affected (65 %), and
- Other costs (65 %).

The Council performs a proportionality assessment of each individual aspect and the overall assessment. What is sufficient to reach an acceptable assessment may therefore differ between cases, given the nature of the cases. The existence of descriptions of aspects of major importance to companies may therefore have a bearing on the whole case and whether the overall assessment will be acceptable or deficient.

Distribution of opinions – sender

The Council receives submissions from government authorities and the various 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 authorities. These may be referred by the Government Offices of Sweden or by authorities. Government authority reports contain proposals for new or amended legislation drawn up by authorities. Most often it is the result of a government commission, but they can also be created by the authority on its own initiative, through a so-called request to the responsible government ministry.
4. Submissions prepared and referred by authorities containing proposals for government authority regulations.

The 200 submissions leading to opinions in 2021 were distributed as follows:

- 72 submissions produced internally within the Government Offices of Sweden
- 38 official government reports (SOU)
- 12 government authority reports
- 78 government authority regulations.

Referring body and type of submission	Total	Proportion of all submissions received (%)	Meets requirements	Does not meet requirements	Proportion that meets requirements (%)
Government Offices of Sweden	72	36 %	36	36	50 %
Official government reports	38	19 %	21	17	55 %
Government authority reports	12	6 %	3	9	25 %
Government authority regulations	78	39 %	56	22	72 %

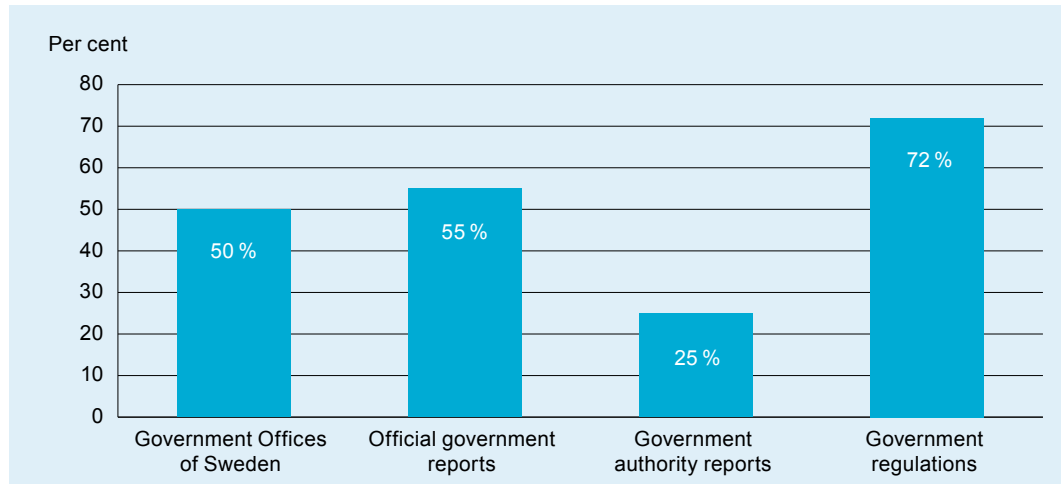


Figure 4: Distribution of opinions and proportion that met the requirements, 2021.

Government Offices of Sweden

The Council gave its opinion on the impact assessments in 72 submissions produced internally at the Government Offices of Sweden. Of these 36, representing 50 per cent, were deemed to meet the KUF requirements. By comparison, 25 out of 55 (45 per cent) were deemed to meet the requirements in 2020 and 24 out of 40 (60 per cent) did so in 2019.

GOVERNMENT OFFICES OF SWEDEN		Number		
Ministry	Meets requirements	Does not meet requirements	Total	
Ministry of Employment	2	0	2	
Ministry of Finance	23	16	39	
Ministry of Defence	0	1	1	
Ministry of Infrastructure	7	8	15	
Ministry of Justice	0	2	2	
Ministry of Culture	0	1	1	
Ministry of the Environment	1	5	6	
Ministry of Health and Social Affairs	2	2	4	
Ministry of Education and Research	1	0	1	
Ministry for Foreign Affairs	0	1	1	
Total	36	36	72	

Figure 5: The Swedish Better Regulation Council's opinions on the internally prepared submissions of the Government Offices of Sweden, 2021.

Official government reports (SOU)

The Council gave its opinion on the impact assessments in 38 official government reports. Of these 21, representing 55 per cent, were deemed to meet the KUF requirements. By comparison, 10 out of 24 (42 per cent) were deemed to meet the requirements in 2020 and 9 out of 22 (41 per cent) did so in 2019.

OFFICIAL GOVERNMENT REPORTS	Number		
	Meets requirements	Does not meet requirements	Total
Ministry of Employment	0	1	1
Ministry of Finance	3	7	10
Ministry of Defence	0	1	1
Ministry of Infrastructure	3	1	4
Ministry of Justice	3	1	4
Ministry of the Environment	6	1	7
Ministry of Enterprise and Innovation	2	2	4
Ministry of Health and Social Affairs	4	2	6
Ministry of Education and Research	0	1	1
Total	21	17	38

Figure 6: The Swedish Better Regulation Council's opinions on official government reports by referring government ministries, 2021.



Government authority reports

The Council gave its opinion on the impact assessments in 12 government authority reports. Of these 3, representing 25 per cent, were deemed to meet the KUF requirements. By comparison, 4 out of 7 (57 per cent) were deemed to meet the requirements in 2020 and 3 out of 6 (50 per cent) did so in 2019.

GOVERNMENT AUTHORITY REPORTS Referring ministry and responsible administrative authority	Number		
	Meets requirements	Does not meet requirements	Total
Ministry of Finance / Swedish Tax Agency	1	0	1
Ministry of Finance / National Board of Housing, Building and Planning	0	1	1
Ministry of Infrastructure / Swedish Energy Markets Inspectorate	1	1	2
Ministry of Infrastructure / Svenska kraftnät	0	1	1
Ministry of Culture / Swedish Press and Broadcasting Authority	1	0	1
Ministry of the Environment / Swedish Environmental Protection Agency	0	2	2
Ministry of Enterprise and Innovation / Swedish Agency for Marine and Water Management	0	1	1
Ministry of Health and Social Affairs / Swedish Medical Products Agency	0	2	2
Ministry of Health and Social Affairs / Public Health Agency of Sweden	0	1	1
Total	3	9	12

Figure 7: The Swedish Better Regulation Council's opinions on government authority reports by referring ministry and responsible authority, 2021.

Government authority regulations

The Council gave its opinion on the impact assessments in 78 submissions from government authorities. Of these 56, representing 72 per cent, were deemed to meet the KUF requirements. By comparison, 39 out of 61 (64 per cent) were deemed to meet the requirements in 2020 and 66 out of 86 (77 per cent) did so in 2019.

AUTHORITIES	Number		
	Meets requirements	Does not meet requirements	Total
National Board of Housing, Building and Planning	3	0	3
National Electrical Safety Board	1	0	1
Swedish Energy Agency	3	2	5
Swedish Estate Agents Inspectorate	2	0	2
Swedish Financial Supervisory Authority	3	0	3
Public Health Agency of Sweden	0	1	1
Swedish Social Insurance Agency	1	0	1
Swedish Agency for Marine and Water Management	2	1	3
National Inspectorate of Strategic Products	0	1	1
Swedish Board of Agriculture	7	0	7
Swedish Chemicals Agency	2	1	3
Swedish Consumer Agency	1	0	1
Swedish National Food Agency	3	3	6
Swedish Medical Products Agency	1	1	2
Norrbottnen County Council	1	0	1
Swedish Press and Broadcasting Authority	1	1	2
Swedish Civil Contingencies Agency	0	1	1
Swedish Environmental Protection Agency	1	2	3
Swedish Post and Telecom Authority	2	0	2
Swedish Inspectorate of Auditors	0	1	1
Riksbank	1	1	2
Swedish National Debt Office	0	1	1
Swedish Maritime Administration	1	0	1
Swedish Tax Agency	1	2	3
Swedish Forest Agency	3	1	4
National Board of Health and Welfare	1	0	1
Swedish Gambling Authority	1	0	1
Statistics Sweden	3	1	4
Swedish Radiation Safety Authority	2	0	2
Swedish Board for Accreditation and Conformity Assessment	2	0	2
Dental and Pharmaceutical Benefits Agency	1	0	1
Swedish Agency for Economic and Regional Growth	1	0	1
Swedish Transport Administration	3	0	3
Swedish Transport Agency	2	0	2
National Agency for Public Procurement	0	1	1
Total	56	22	78

Figure 8: The Swedish Better Regulation Council's opinions on government authority regulations, 2021.

Results by aspect – categorised by sender and type of submission

Results by aspect – Government Offices of Sweden, internal

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, for example, the following:

- As the Council has also noted in previous years, the aspects of Section 6 of the KUF are described relatively well by the Government Offices of Sweden. The acceptable proportions are between 58 per cent (need for provision of special information) and 97 per cent (description of background and purpose of the proposal).
- In addition, the descriptions of the aspects relating to Section 7 of the KUF continue to have a lower proportion of acceptable sub-assessments. The description of affected companies by size has the lowest proportion of acceptable partial descriptions at 33 per cent, while the description of affected companies by industry has the highest proportion of acceptable descriptions at 89 per cent.
- When comparing with the 2020 results, it can be noted that the main improvement concerns the description of the proposal's impact on the competitive conditions of affected companies (+11 percentage points). Other improvements include the description of the proposal's impact on other costs of companies and whether companies need to make any changes to their activities as a result of the proposal (both + 10 percentage points). Deteriorations are found in the description of the number of affected companies (-12 percentage points), affected companies by size (-9 percentage points) and the need for provision of special information (-6 percentage points).

GOVERNMENT OFFICES OF SWEDEN (produced internally)		Number		Proportion acceptable (%)
Results by aspect and regulator		Acceptable	Deficient	
Purpose		70	2	97 %
Effects if no regulation is issued		67	5	93 %
Particular attention to the date of entry into force		65	7	90 %
Affected companies by industry		64	8	89 %
Consistency with EU law		64	8	89 %
Alternative solutions		58	14	81 %
Changes in business activities		52	20	72 %
Effects in other respects		51	21	71 %
Other costs		44	28	61 %
Provision of special information		42	30	58 %
Number of companies affected		38	34	53 %
Impact on competition		38	34	53 %
Administrative costs		33	39	46 %
Special attention for small businesses		29	43	40 %
Size of the companies affected		24	48	33 %

Figure 9: The Swedish Better Regulation Council's assessment by aspect, internally prepared submissions by the Government Offices of Sweden, 2021.

Results by aspect – official government reports

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

- As the Council has also previously noted, for official government reports, the aspects of Section 6 of the KUF are described relatively well. The acceptable proportions are between 55 per cent (need for provision of special information) and 97 per cent (description of the purpose of the proposal).
- In relation to aspects of Section 7 of the KUF, the lowest proportion of acceptable descriptions is found in the description of administrative costs, as well as impact on competition, both with a proportion of 47 per cent. The highest proportion of acceptable sub-descriptions consists of affected companies by industry, at 87 per cent.
- When comparing with the 2020 results, it can be noted that the greatest improvements can be seen in descriptions of whether companies need to make changes in their business activities as a result of the proposal (+14 percentage points), alternative solutions (+13 percentage points) and consistency with EU law (+12 percentage points). Deteriorations are found in the description of the number of affected companies (-12 percentage points) and affected companies by size (-9 percentage points).

OFFICIAL GOVERNMENT REPORTS (SOU)		Number		Proportion acceptable (%)
Results by aspect and regulator		Acceptable	Deficient	
Purpose		37	1	97 %
Effects if no regulation is issued		37	1	97 %
Consistency with EU law		36	2	95 %
Alternative solutions		35	3	92 %
Affected companies by industry		33	5	87 %
Particular attention to the date of entry into force		33	5	87 %
Effects in other respects		26	12	68 %
Changes in business activities		26	12	68 %
Number of companies affected		24	14	63 %
Special attention for small businesses		22	16	58 %
Provision of special information		21	17	55 %
Other costs		21	17	55 %
Size of the companies affected		19	19	50 %
Impact on competition		18	20	47 %
Administrative costs		18	20	47 %

Figure 10: The Swedish Better Regulation Council's assessment by aspect, official government reports, 2021.

Results by 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, for example, the following:

- For this consultation group as well, the aspects of Section 6 of the KUF are described as being better than the company aspects in Section 7 of the KUF. The acceptable proportions range from 58 per cent (need for provision of special information) to 100 per cent (purpose of the proposal and effects if no regulation is issued).
- Regarding descriptions of company aspects in Section 7 of the KUF, the acceptable proportions range from 17 per cent (size of the companies affected) to 92 per cent (affected companies by industry).
- When comparing with the 2020 results, it can be noted that there are improvements mainly in the description of effects if no regulation is issued (+14 percentage points), if particular attention needs to be given to the date of entry into force, and effects in other respects (both +10 percentage points). The main deteriorations relate to the size of affected companies (-40 percentage points), whether particular attention needs to be paid to small companies when formulating the regulations (-32 percentage points), and the proposal's consistency with EU law (-17 percentage points).

GOVERNMENT AUTHORITY REPORTS	Number		Proportion acceptable (%)
Results by aspect and regulator	Acceptable	Deficient	
Purpose	12	0	100 %
Effects if no regulation is issued	12	0	100 %
Affected companies by industry	11	1	92 %
Consistency with EU law	10	2	83 %
Alternative solutions	10	2	83 %
Impact on competition	8	4	67 %
Particular attention to the date of entry into force	8	4	67 %
Effects in other respects	8	4	67 %
Provision of special information	7	5	58 %
Number of companies affected	7	5	58 %
Changes in business activities	6	6	50 %
Administrative costs	5	7	42 %
Other costs	5	7	42 %
Special attention for small businesses	3	9	25 %
Size of the companies affected	2	10	17 %

Figure 11: The Swedish Better Regulation Council's assessment by aspect, government authority reports, 2021.

Results by aspect – government authority regulations

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

- The acceptable proportions for descriptions of the aspects in Section 6 of the KUF range from 87 per cent (need for provision of special information) to 100 per cent (description of purpose).
- Regarding descriptions relating to Section 7 of the KUF, these range from 53 per cent (size of the companies affected) to 95 per cent (affected companies by industry).
- When comparing with the 2020 results, major and minor improvements in all aspects can be noted. The main improvements concern the description of other costs (+20 percentage points), special attention for small businesses (+13 percentage points) and effects in other respects (+11 percentage points). There are no aspects for which the results have deteriorated compared to last year.

GOVERNMENT AUTHORITY REGULATIONS	Number		Proportion acceptable (%)
Results by aspect and regulator	Acceptable	Deficient	
Purpose	78	0	100 %
Effects if no regulation is issued	77	1	99 %
Consistency with EU law	74	4	95 %
Particular attention to the date of entry into force	74	4	95 %
Affected companies by industry	74	4	95 %
Alternative solutions	73	5	94 %
Effects in other respects	69	9	88 %
Provision of special information	68	10	87 %
Changes in business activities	64	14	82 %
Number of companies affected	61	17	78 %
Other costs	60	18	77 %
Special attention for small businesses	58	20	74 %
Administrative costs	54	24	69 %
Impact on competition	48	30	62 %
Size of the companies affected	41	37	53 %

Figure 12: The Swedish Better Regulation Council's assessment by aspect, government authority regulations, 2021.

Secretariat responses

If a proposal is not deemed to have a significant impact on business, the Swedish Better Regulation Council does not issue an opinion, but instead responds to the submission with what is known as a 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. The reason is always clearly stated in the response. See p. 10 for more information on the different reasons for answering a submission with a secretariat response.

In 2021, the Council answered 175 submissions with secretariat responses.

- In 113 of the secretariat responses, corresponding to 65 per cent, the reason was limited effects for companies.
- In 42 of the secretariat responses, corresponding to 24 per cent, the reason was resource constraints.
- In 6 of the secretariat responses, corresponding to 3 per cent, the reason was time constraints.
- 14 of the secretariat responses, corresponding to 8 per cent, belonged to the category Other.⁵

SECRETARIAT RESPONSES		2021	
Reason for a secretariat response	Number	Proportion (%)	
Limited effects	113	65 %	
Resource constraints	42	24 %	
Time constraints	6	3 %	
Other	14	8 %	
Total	175	100 %	

Figure 13: Reason for secretariat response, 2021.

⁵ This category includes submissions where no statute text has been referred to the Swedish Better Regulation Council. There may also be submissions where Section 7 of the Fee Regulation (1992:191) applies, which means that the KUF does not apply, as well as submissions where the decisions on the regulations have been taken before the referral to the Swedish Better Regulation Council, which means that the Swedish Better Regulation Council does not comment on the quality of the impact assessment.

Review of impact assessments drawn up at EU level

In 2021, 7 submissions with draft impact assessments prepared at EU level were received. As evidenced by previous annual reports, the Swedish Better Regulation Council followed up on the task of reviewing impact assessments prepared at EU level in 2017–2018.⁶ The follow-up led to a request, which was prepared jointly with the Swedish Agency for Economic and Regional Growth.⁷

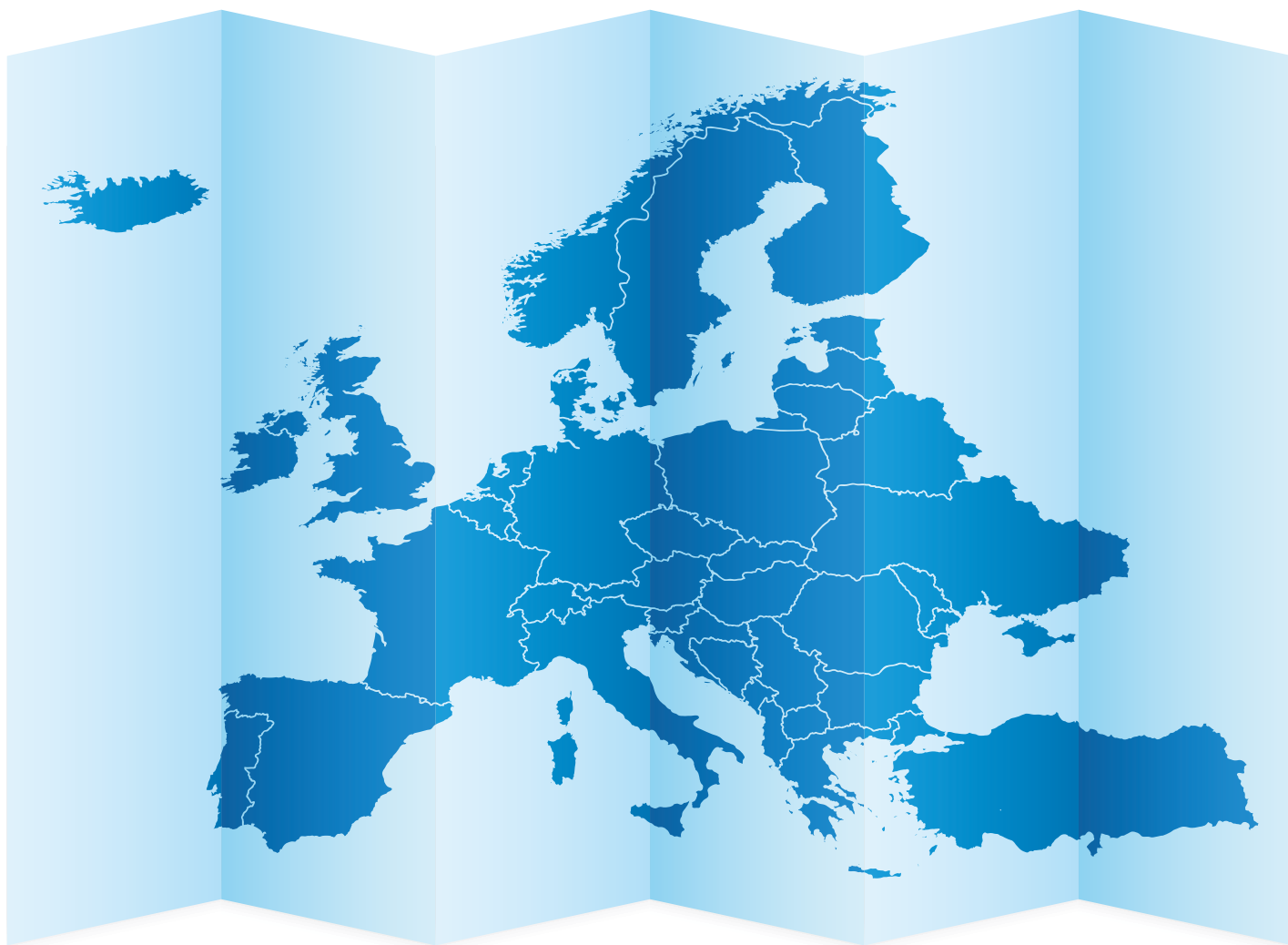
In the light of the findings of the Council's follow-up, the Council maintains that the mandate for the review of impact assessments prepared at EU level is not designed in a way that maximises benefit for regulators, while at the same time the review is very resource-intensive. In 2021, 6 draft impact assessments prepared at EU level were received via the regular consultation process from the responsible Swedish ministry. As last year, the Council responded to all of these submissions with secretariat responses due to resource constraints.

In the autumn of 2021, the Council was contacted by the Ministry of Enterprise and Innovation, which expressed its interest in the Council's review of the European Commission's impact assessment on the proposals for a Directive of the European Parliament and of the Council on the improved implementation of the principle of equal pay for men and women for equal work or work of equal value through pay transparency and compliance mechanisms.⁸ In view of the special circumstances, and the clear wishes and contact with the Council before the submission, the Council chose to give its opinion on the matter. Nevertheless, the Council maintains the conclusions expressed in the above-mentioned request regarding the appropriate form of the mandate to review impact assessments prepared at EU level.

⁶ See Chapter 4 Follow-up (p. 28) of the Swedish Better Regulation Council's 2018 Annual Report for more information on the follow-up.

⁷ The request was submitted to the Ministry of Enterprise and Innovation in November 2019. The request makes proposals on what each body should do or contribute, and when in the process this should be done. Swedish Better Regulation Council reference number RR 2019-283, *Consequences of EU legislation Request following completed review and evaluation of the Swedish Better Regulation Council's assignment with regard to impact assessments drawn up at EU level*.

⁸ Swedish Better Regulation Council reference number RR 2021-293, decision taken at the meeting of the Council on 27 October 2021.



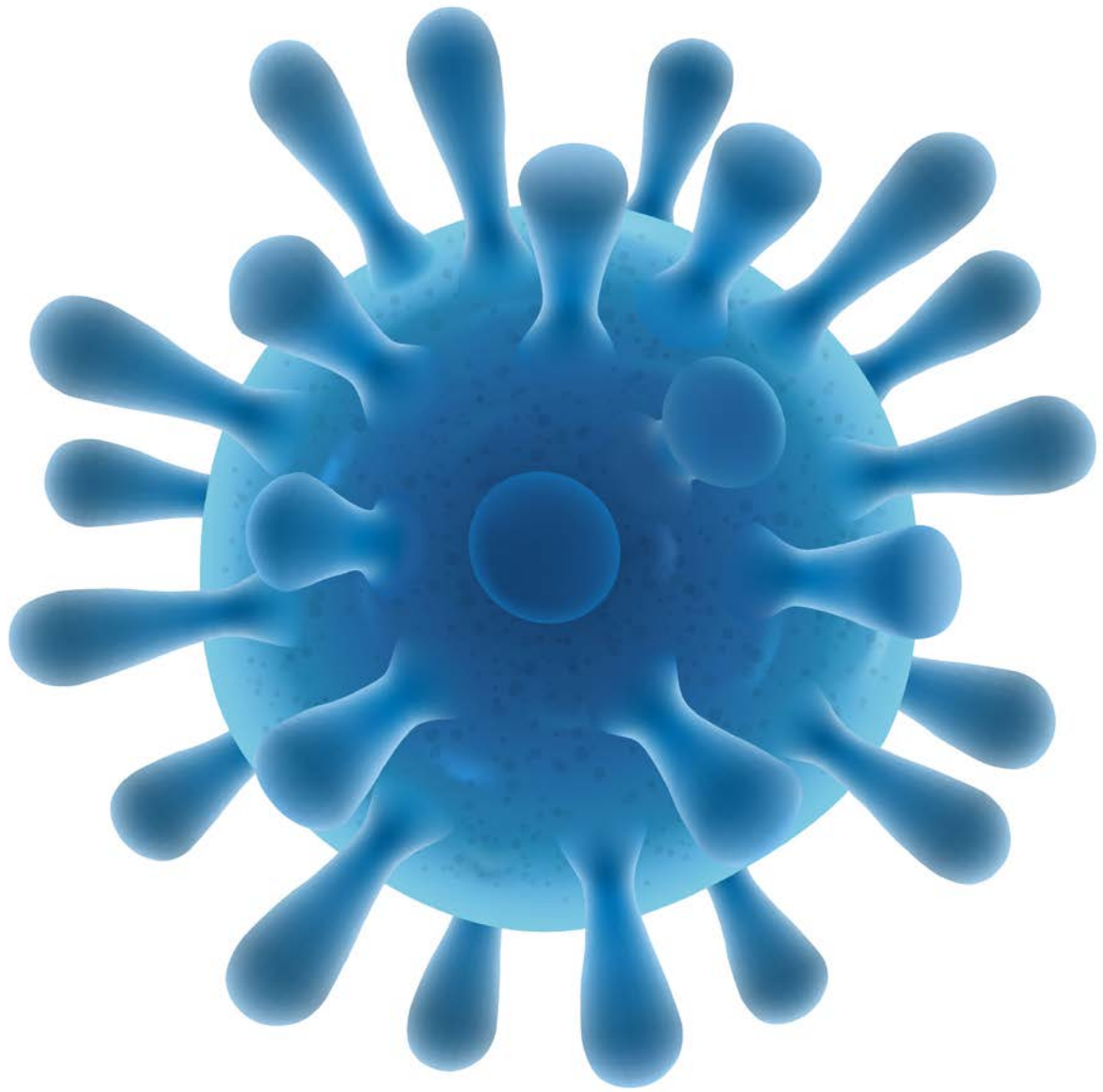
4

Impact of the COVID-19 pandemic on the work of the Swedish Better Regulation Council

The impact of the COVID-19 pandemic on the activities of the Council in 2021 was not as significant as in 2020. In the autumn of 2020, the Council held several extraordinary meetings to give its opinion on submissions with proposals arising from the COVID-19 pandemic. In 2021, the Council held only one extraordinary meeting.⁹ There have also been no unforeseen events that have affected the staffing situation, which occurred in the spring of 2020 when staff tasked with acting as rapporteurs for the Council had to be redeployed and serve as reinforcement of the Swedish Agency for Economic and Regional Growth's short-term organisation. Therefore, although the pandemic is still ongoing, the activities of the Council have been able to return to some sort of normalcy.

During the year, a few submissions have been received by the Council that have been directly linked to the COVID-19 pandemic, as well as a number of submissions where the aim of the proposals has been stated to be to facilitate recovery from the impact that the COVID-19 pandemic has had on companies.

⁹ Meeting of the Council on 17 December 2021.



5

Reflections on the 2021 financial year

When summing up 2021, the Council shows that, of the submissions received, the proportion of opinions for this year is 53 per cent, which is in line with the 2018 and 2019 financial years.¹⁰ The statistics show that the proportion of acceptable impact assessments is 58 per cent, which is an improvement of 5 percentage points compared to 2020.¹¹ The results vary between the referring regulators. Official government reports have the biggest improvement in terms of proportion of acceptable impact assessments¹². The Government Offices of Sweden's internally-produced submissions were also improved compared to last year¹³. Both of the categories mentioned show a result this year of about 50 per cent acceptable impact assessments. As regards authorities, after a drop last year, the results this year is more in line with previous years.¹⁴ It is only in the category government authority reports that the quality of impact assessments has deteriorated.¹⁵ As in previous years, there are relatively few submissions in this category this year (12), so it is difficult to draw any far-reaching conclusions from the results. However, the Council notes that the proportion of acceptable impact assessments in this category is remarkably low.

As mentioned earlier in this annual report, the Council answered 175 submissions with secretariat responses, of which 42, representing 24 per cent, were due to resource constraints. Last year, this proportion was 30 per cent.¹⁶ However, as noted in Section 4, last year presented special circumstances for the Council. As the Council's circumstances have been more normal this year, the Council considers the proportion for resource constraints to be alarmingly high. It is problematic that impact assessments for proposals that may have a significant impact on business are not subject to scrutiny.

In reviewing the reflections submitted in previous years, the Council notes that little happened in 2021. The Council maintains the importance of the recommendations submitted in the past, and intends to continue the qualitative follow-up in future annual reports.

10 In 2021, 375 submissions were answered, 200 of them with an opinion, representing a proportion of 53%. In 2020, 390 submissions were answered, 147 of them with an opinion, representing a proportion of 38%. In 2019, 311 submissions were answered, 154 of them with an opinion, representing a proportion of 50%. In 2018, 307 submissions were answered, 151 of them with an opinion, representing a proportion of 49%. In 2017, 355 submissions were answered, 134 of them with an opinion, representing a proportion of 38%.

11 Proportion of acceptable impact assessments 2021: 58%. 2020: 53%. 2019: 66%. 2018: 56%. 2017: 57%.

12 Official government reports, proportion of acceptable impact assessments 2021: 55%. 2020: 42%. 2019: 41%. 2018: 65%. 2017: 39%.

13 Government Offices of Sweden (internally produced), proportion of acceptable impact assessments 2021: 50%. 2020: 45%. 2019: 60%. 2018: 35%. 2017: 31%.

14 Government authority reports, proportion of acceptable impact assessments 2021: 72%. 2020: 64%. 2019: 77%. 2018: 62%. 2017: 79%.

15 Government authority reports, proportion of acceptable impact assessments 2021: 25%. 2020: 57%. 2019: 50%. 2018: 82%. 2017: 82%.

16 Secretariat response due to resource constraints, proportion of secretariat responses 2021: 24%. 2020: 30%. 2019: 6%. 2018: 6%. 2017: 15%.

Follow-up of previous years' reflections

The quality of official government reports needs to be improved

The Council has previously recommended that significant weight, commitment and time needs to be given to the impact assessment work of committees. The Council maintains the above, but at the same time can see a slight improvement in the quality of impact assessments for this category. The Council welcomes this improvement, although it remains to be seen whether the improvement will be sustained.

The terms of reference should be formulated more openly

The Council has previously noted that the terms of reference submitted to committees of inquiry as well as the inquiries carried out by the ministries themselves or submitted to government authorities are often narrow and restrictively defined. According to the Council, such terms of reference and assignments need to be formulated in such a way as to allow the committee or authority to investigate a particular issue without preconditions. Last year, the Council noted some steps in the right direction in this respect. However, the recommendation in this respect remains.

Resources and competences are necessary for thorough impact assessments

According to the Council, sufficient time and resources need to be devoted to the impact assessment process. Impact assessment work also needs to be started in time, and the time available for committees to carry out impact assessments needs to be sufficiently long to allow detailed impact assessments. The Council previously also stressed the importance of committees having access to experts in the form of statisticians and economists, preferably in a secretariat attached to the committee. No such secretariat was established in 2021. During the year, the Council also noted that experts in various inquiries have on several occasions criticised the conditions imposed on the inquiry in question. The Council maintains the recommendations it has previously made in this aspect.

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

The Council has long argued that there should be an opportunity to review the quality of impact assessments at an earlier stage. This would allow the regulator to take on board the views of the Council and, if necessary, to complete the impact assessment before the regular consultation round. No such development of the regulatory process has taken place to date, and the Council therefore maintains its recommendation.

The EU impact assessment process needs to be renewed

In previous annual reports, the Council has made recommendations in line with the above-mentioned request. To date, the Council's mandate in this respect has not changed. The Council therefore maintains its recommendation.

Digital tools for standardised information need to be developed

The Council has previously stated that digital tools need to be developed to enable regulators to easily access the relevant information needed in the impact assessment process. This would lead to a more efficient inquiry process and more well-researched proposals. No such development has taken place, and the Council therefore maintains its recommendation.

The impact assessment process needs to be renewed

The Council has previously called for the OECD to perform an objective review of the impact assessment process in Sweden to ensure that this work is carried out effectively through the regulatory process. No such review has been carried out. In terms of the impact assessment process in general, the Inquiry on a simpler regulatory framework for micro-enterprises and a modernised accounting act submitted its report during the year.¹⁷ Similarly, the Government has submitted written communication¹⁸ to the Parliament with new simplification objectives, emphasising the importance of high-quality impact assessments. The Council notes that issues related to impact assessments and improving the quality of the same have been discussed more in 2021 than in previous years, which the Council considers a positive development.

Review of the description of regulatory costs for companies in impact assessments

In last year's annual report, the Council stated that there is a need for an essential review of companies' regulatory costs, in terms of how such costs should be described and calculated in impact assessments. The Council further stated that it is important that cost changes described in impact assessments reflect the reality of companies and that the descriptions are not too theoretical. Proposers therefore need to have a good understanding of the elements that will arise as a result of a regulatory requirement, and be able to describe and calculate cost changes as a result of it. Such a review, as requested by the Council, has not been initiated. The Council maintains its recommendation.

ACTION NOT PERFORMED

UNDER REMEDIAL ACTION

ACTION PERFORMED

¹⁷ Simplification for micro-enterprises and modernisation of the accounting act (SOU 2021:60).

¹⁸ Government communication 2021/22:3, A simplification policy for enhanced competitiveness, growth and innovation capacity.

Table appendix

Opinions of the Swedish Better Regulation Council in 2021 by referring body and type of submission
(assessment of impact assessment as a whole and by aspect)

Table 1 Government Offices of Sweden (produced internally)

A = Acceptable, D = 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	A	D	A	D	A	D	A	D	A	D	A	D	
<i>Ministry</i>															
Ministry of Employment	2	0	2	0	2	0	2	0	2	0	2	0	0	2	
Ministry of Finance	23	16	38	1	29	10	37	2	36	3	37	2	28	11	
Ministry of Defence	0	1	1	0	1	0	1	0	1	0	1	0	0	1	
Ministry of Infrastructure	7	8	14	1	12	3	13	2	12	3	12	3	5	10	
Ministry of Justice	0	2	2	0	2	0	2	0	2	0	2	0	1	1	
Ministry of Culture	0	1	1	0	1	0	1	0	1	0	0	1	0	1	
Ministry of the Environment	1	5	6	0	5	1	5	1	6	0	5	1	4	2	
Ministry of Health and Social Affairs	2	2	4	0	4	0	4	0	3	1	4	0	2	2	
Ministry of Education and Research	1	0	1	0	1	0	1	0	1	0	1	0	1	0	
Ministry for Foreign Affairs	0	1	1	0	1	0	1	0	1	0	1	0	1	0	
Total	36	36	70	2	58	14	67	5	65	7	65	7	42	30	

Table 2 Official government reports

A = Acceptable, D = 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	A	D	A	D	A	D	A	D	A	D	A	D	
<i>Ministry</i>															
Ministry of Employment	0	1	1	0	1	0	1	0	1	0	1	0	0	1	
Ministry of Finance	3	7	10	0	7	3	9	1	9	1	9	1	7	3	
Ministry of Defence	0	1	1	0	1	0	1	0	1	0	1	0	0	1	
Ministry of Infrastructure	3	1	4	0	4	0	4	0	4	0	2	2	2	2	
Ministry of Justice	3	1	4	0	4	0	4	0	4	0	4	0	4	0	
Ministry of the Environment	6	1	7	0	7	0	7	0	7	0	6	1	2	5	
Ministry of Enterprise and Innovation	2	2	3	1	4	0	4	0	3	1	3	1	3	1	
Ministry of Health and Social Affairs	4	2	6	0	6	0	6	0	6	0	6	0	2	4	
Ministry of Education and Research	0	1	1	0	1	0	1	0	1	0	1	0	1	0	
Total	21	17	37	1	35	3	37	1	36	2	33	5	21	17	

	Number of companies		Company size		Industry		Administrative costs		Other costs		Business activities		Competitive conditions		Other respects		Special attention for small businesses	
	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D
	0	2	1	1	1	1	1	1	2	0	2	0	2	0	2	0	2	0
	26	13	17	22	35	4	22	17	28	11	31	8	26	13	32	7	19	20
	1	0	0	1	1	0	0	1	1	0	1	0	0	1	0	1	0	1
	6	9	3	12	13	2	5	10	8	7	11	4	7	8	11	4	4	11
	0	2	0	2	2	0	1	1	0	2	1	1	0	2	0	2	0	2
	0	1	0	1	1	0	0	1	1	0	1	0	1	0	0	1	0	1
	2	4	0	6	6	0	2	4	1	5	2	4	0	6	3	3	1	5
	2	2	2	2	4	0	2	2	2	2	2	2	1	3	2	2	2	2
	1	0	1	0	1	0	0	1	1	0	1	0	1	0	1	0	1	0
	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1
	38	34	24	48	64	8	33	39	44	28	52	20	38	34	51	21	29	43

	Number of companies		Company size		Industry		Administrative costs		Other costs		Business activities		Competitive conditions		Other respects		Special attention for small businesses	
	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D
	1	0	1	0	1	0	0	1	1	0	1	0	1	0	1	0	1	0
	5	5	3	7	9	1	3	7	3	7	5	5	2	8	4	6	5	5
	0	1	0	1	0	1	0	1	0	1	0	1	1	0	1	0	0	1
	3	1	3	1	4	0	3	1	3	1	4	0	4	0	4	0	2	2
	4	0	3	1	3	1	2	2	3	1	2	2	3	1	3	1	4	0
	6	1	6	1	7	0	6	1	6	1	6	1	2	5	5	2	3	4
	2	2	1	3	2	2	2	2	2	2	3	1	2	2	3	1	3	1
	3	3	2	4	6	0	2	4	3	3	5	1	3	3	4	2	3	3
	0	1	0	1	1	0	0	1	0	1	0	1	0	1	1	0	1	0
	24	14	19	19	33	5	18	20	21	17	26	12	18	20	26	12	22	16

Table 3 Government authority reports

A = Acceptable, D = 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	A	D	A	D	A	D	A	D	A	D	A	D	
<i>Referring ministry and responsible authority</i>															
Ministry of Finance / Swedish Tax Agency	1	0	1	0	1	0	1	0	1	0	1	0	1	0	
Ministry of Finance / National Board of Housing, Building and Planning	0	1	1	0	1	0	1	0	1	0	1	0	1	0	
Ministry of Infrastructure / Swedish Energy Markets Inspectorate	1	1	2	0	2	0	2	0	2	0	2	0	1	1	
Ministry of Infrastructure / Svenska kraftnät	0	1	1	0	1	0	1	0	1	0	1	0	0	1	
Ministry of Culture / Swedish Press and Broadcasting Authority	1	0	1	0	1	0	1	0	1	0	1	0	1	0	
Ministry of the Environment / Swedish Environmental Protection Agency	0	2	2	0	2	0	2	0	2	0	1	1	1	1	
Ministry of Enterprise and Innovation / Swedish Agency for Marine and Water Management	0	1	1	0	1	0	1	0	1	0	0	1	1	0	
Ministry of Health and Social Affairs / Swedish Medical Products Agency	0	2	2	0	2	0	2	0	1	1	1	1	1	1	
Ministry of Health and Social Affairs / Public Health Agency of Sweden	0	1	1	0	0	1	1	0	0	1	0	1	0	1	
Total	3	9	12	0	11	1	12	0	10	2	8	4	7	5	

	Number of companies		Company size		Industry		Administrative costs		Other costs		Business activities		Competitive conditions		Other respects		Special attention for small businesses	
	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D
	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	1	0	1	0	0	1	1	0	0	1
	2	0	1	1	2	0	1	1	1	1	1	1	1	1	2	0	1	1
	0	1	0	1	1	0	0	1	0	1	1	0	1	0	1	0	0	1
	1	0	0	1	1	0	1	0	1	0	1	0	1	0	1	0	1	0
	1	1	0	2	2	0	0	2	0	2	0	2	0	2	1	1	0	2
	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1
	0	2	0	2	2	0	1	1	0	2	1	1	0	2	0	2	0	2
	1	0	0	1	1	0	1	0	1	0	0	1	0	1	1	0	0	1
	7	5	2	10	11	1	5	7	5	7	6	6	4	8	8	4	3	9

Table 4 Government authority regulations

A = Acceptable, D = 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		
Authority	Met the requirements	Did not meet the requirements	A	D	A	D	A	D	A	D	A	D	A	D	
National Board of Housing, Building and Planning	3	0	3	0	3	0	3	0	3	0	3	0	3	0	
National Electrical Safety Board	1	0	1	0	1	0	1	0	1	0	1	0	1	0	
Swedish Energy Agency	3	2	5	0	5	0	5	0	5	0	5	0	5	0	
Swedish Estate Agents Inspectorate	2	0	2	0	1	1	2	0	2	0	2	0	2	0	
Swedish Financial Supervisory Authority	3	0	3	0	3	0	3	0	3	0	3	0	3	0	
Public Health Agency of Sweden	0	1	1	0	1	0	1	0	1	0	1	0	1	0	
Swedish Social Insurance Agency	1	0	1	0	1	0	1	0	1	0	1	0	1	0	
Swedish Agency for Marine and Water Management	2	1	3	0	3	0	3	0	3	0	2	1	3	0	
National Inspectorate of Strategic Products	0	1	1	0	1	0	1	0	1	0	1	0	1	0	
Swedish Board of Agriculture	7	0	7	0	7	0	7	0	7	0	7	0	7	0	
Swedish Chemicals Agency	2	1	3	0	3	0	3	0	3	0	3	0	2	1	
Swedish Consumer Agency	1	0	1	0	1	0	1	0	1	0	1	0	1	0	
Swedish National Food Agency	3	3	6	0	6	0	6	0	6	0	4	2	4	2	
Swedish Medical Products Agency	1	1	2	0	2	0	2	0	2	0	2	0	2	0	
Norrbottn County Council	1	0	1	0	1	0	1	0	1	0	1	0	1	0	
Swedish Press and Broadcasting Authority	1	1	2	0	2	0	2	0	2	0	2	0	1	1	
Swedish Civil Contingencies Agency	0	1	1	0	1	0	1	0	1	0	1	0	1	0	
Swedish Environmental Protection Agency	1	2	3	0	3	0	3	0	3	0	3	0	2	1	
Swedish Post and Telecom Authority	2	0	2	0	2	0	2	0	2	0	2	0	2	0	
Swedish Inspectorate of Auditors	0	1	1	0	1	0	1	0	0	1	1	0	1	0	
Riksbank	1	1	2	0	2	0	2	0	1	1	2	0	1	1	
Swedish National Debt Office	0	1	1	0	1	0	1	0	1	0	1	0	1	0	
Swedish Maritime Administration	1	0	1	0	1	0	1	0	1	0	1	0	1	0	
Swedish Tax Agency	1	2	3	0	3	0	3	0	2	1	3	0	2	1	
Swedish Forest Agency	3	1	4	0	4	0	4	0	4	0	4	0	3	1	
National Board of Health and Welfare	1	0	1	0	1	0	1	0	1	0	1	0	1	0	
Swedish Gambling Authority	1	0	1	0	0	1	0	1	1	0	1	0	1	0	
Statistics Sweden	3	1	4	0	4	0	4	0	3	1	4	0	4	0	
Swedish Radiation Safety Authority	2	0	2	0	2	0	2	0	2	0	2	0	2	0	
Swedish Board for Accreditation and Conformity Assessment	2	0	2	0	0	2	2	0	2	0	2	0	2	0	
Dental and Pharmaceutical Benefits Agency	1	0	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	1	0	
Swedish Transport Administration	3	0	3	0	3	0	3	0	3	0	2	1	2	1	
Swedish Transport Agency	2	0	2	0	2	0	2	0	2	0	2	0	2	0	
National Agency for Public Procurement	0	1	1	0	0	1	1	0	1	0	1	0	0	1	
Total	56	22	78	0	73	5	77	1	74	4	74	4	68	10	

	Number of companies		Company size		Industry		Administrative costs		Other costs		Business activities		Competitive conditions		Other respects		Special attention for small businesses	
	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D
	3	0	2	1	3	0	2	1	2	1	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
	5	0	3	2	5	0	1	4	2	3	4	1	3	2	5	0	3	2
	1	1	1	1	2	0	2	0	2	0	2	0	1	1	2	0	1	1
	3	0	2	1	3	0	3	0	3	0	3	0	2	1	3	0	2	1
	0	1	0	1	1	0	0	1	0	1	0	1	0	1	1	0	0	1
	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0
	3	0	3	0	3	0	3	0	1	2	1	2	2	1	3	0	3	0
	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1
	7	0	6	1	7	0	6	1	7	0	7	0	7	0	7	0	7	0
	2	1	1	2	3	0	2	1	2	1	2	1	2	1	2	1	3	0
	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0
	4	2	2	4	6	0	2	4	4	2	4	2	3	3	6	0	4	2
	1	1	0	2	1	1	1	1	1	1	1	1	1	1	2	0	1	1
	1	0	1	0	1	0	1	0	1	0	1	0	0	1	1	0	0	1
	1	1	0	2	2	0	0	2	1	1	1	1	1	1	2	0	1	1
	0	1	1	0	1	0	0	1	1	0	1	0	1	0	1	0	1	0
	2	1	0	3	3	0	2	1	2	1	2	1	1	2	2	1	1	2
	2	0	2	0	2	0	2	0	2	0	2	0	2	0	2	0	2	0
	1	0	0	1	1	0	0	1	0	1	0	1	0	1	0	1	0	1
	2	0	1	1	2	0	2	0	2	0	2	0	0	2	1	1	1	1
	0	1	0	1	1	0	0	1	1	0	1	0	0	1	1	0	0	1
	1	0	1	0	1	0	1	0	1	0	1	0	0	1	1	0	1	0
	3	0	2	1	3	0	1	2	1	2	2	1	1	2	2	1	2	1
	4	0	3	1	4	0	3	1	4	0	4	0	4	0	2	2	3	1
	1	0	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	0	1	1	0	1	0
	3	1	0	4	4	0	4	0	4	0	4	0	3	1	4	0	3	1
	2	0	2	0	2	0	2	0	2	0	2	0	2	0	2	0	2	0
	2	0	2	0	2	0	2	0	2	0	2	0	2	0	2	0	2	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	1	0	1	0	1	0	0	1	1	0	1	0
	0	3	0	3	1	2	3	0	3	0	3	0	0	3	3	0	3	0
	2	0	2	0	2	0	2	0	2	0	2	0	2	0	2	0	2	0
	0	1	0	1	1	0	0	1	0	1	0	1	0	1	0	1	0	1
	61	17	42	36	74	4	54	24	60	18	64	14	48	30	69	9	58	20



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 role 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.

www.regelradet.se