

A white seagull is shown in mid-flight, its wings spread wide, against a vibrant blue sky filled with soft, white cumulus clouds. The bird's head is tilted upwards, and its beak is open, as if it is calling or singing. The overall scene conveys a sense of freedom and openness.

Annual Report

2022

Regel|rådet



Regel|rådet

Annual Report **2022**

Contents

Foreword	3
Summary	4
Introduction	6
Swedish Better Regulation Council	7
1. Reviews in practice	8
2. International collaboration	12
3. Reviews in figures	14
Opinions	14
Results by aspect	15
Distribution of opinions	17
Results by aspect – categorised by sender and type of submission	21
Secretariat responses	25
Review of impact assessments drawn up at the EU level	26
4. Reflections on the year of operation 2022	28
Follow-up of previous years' reflections	29
Table appendix	30

Foreword

The time has come to sum up another operating year. This annual report presents comprehensive statistics on the quality of regulators' impact assessments and information on the Swedish Better Regulation Council's (Regelrådet) general activities. The Council has also continued the qualitative follow-up of recommendations made in previous years, in order to see changes over time.

This year's results show an improvement in the quality of impact assessments, which is encouraging. However, there are significant differences in quality between regulators. The aim should be for all impact assessments to be compliant. Unfortunately, the Council notes that there is still some way to go before this is the case. For example, only half of the impact assessments related to an official government report and fewer than half of those related to a government authority report meet the requirements. The Council also notes that the same aspects – the impact on costs, competition and whether special attention needs to be given to small businesses in the formulation of the regulations – are repeatedly described as inadequate. Companies affected, particularly in terms of size but also number, are similarly difficult to describe for many regulators. There is thus a lack of knowledge about those affected by the rules. The adoption and entry into force of rules under such conditions therefore remains a major challenge.

The Swedish Better Regulation Council therefore has an important role to play in the system – the systematic scrutiny of proposed statutes that may have an impact on businesses needs to continue. Resources are required to review all proposals deemed to have such impact, as well as to carry out the other tasks assigned to the Council by its mandate. The Council therefore welcomes the increased allocation announced in the Government's budget proposal for 2023.

Discussion of issues related to impact assessments and improving their quality increased in 2021 and continued in 2022. In addition to the report of the micro-enterprise inquiry and the new simplification targets set in 2021, there is now also a memorandum on better impact assessments and statements in the budget proposal on strengthening the Council and reducing the regulatory burden and administration for businesses. The Council takes a positive view of the above, but until concrete proposals are implemented, the situation and challenges we see today will persist.

I would like to warmly thank Claes Norberg, who stepped down as Deputy Chair in December, after many years of dedication to the Swedish Better Regulation Council. I would also like to extend a warm welcome to Helena Fond and Lars Silver as ordinary members, and Hans Lindblad as alternate member.



Anna-Lena Bohm
Chair

Summary

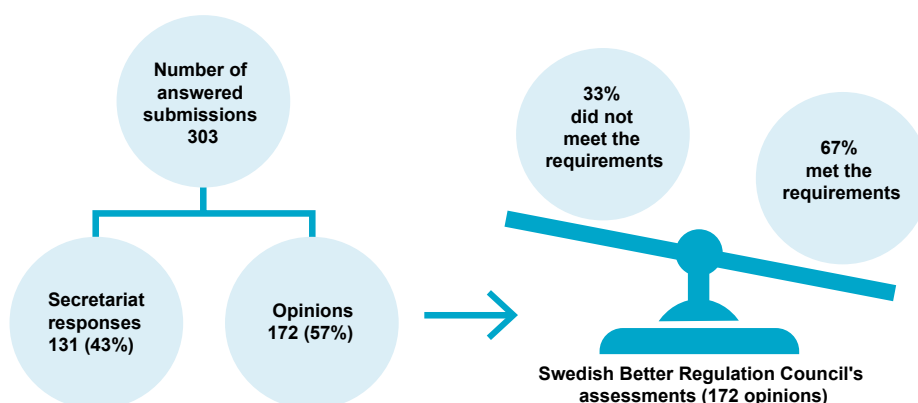
Swedish Better Regulation Council

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 businesses. The assessment is based on the requirements set out in Sections 6 and 7 of the Ordinance on Regulatory Impact Assessment (2007:1244).

How? When a proposal is deemed to have a significant impact on businesses, 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 businesses.

Answered submissions



Distribution of opinions 2022

Government Offices of Sweden
52 submissions

👍 63 % met the requirements
👎 37 % did not meet the requirements

Official government reports (SOU)
22 submissions

👍 50 % met the requirements
👎 50 % did not meet the requirements

Government authority reports
10 submissions

👍 40 % met the requirements
👎 60 % did not meet the requirements

Government authority regulations
88 submissions

👍 77 % met the requirements
👎 23 % did not meet the requirements



Regel|rådet

Annual Report **2022**

Introduction

The Swedish Better Regulation Council's mandate

The Swedish Better Regulation Council is a designated decision-making body tasked with reviewing impact assessments for new and amended regulations that have an impact on businesses. 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 (2007:1244), abbreviated below as KUF. The Council also reviews impact assessments created at the EU level, at the request of the relevant Swedish government ministry or authority. 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.

Composition and organisation of the Swedish Better Regulation Council

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

The Council consists of a chair, a deputy chair and three ordinary members. Anna-Lena Bohm has been serving as chair of the Swedish Better Regulation Council since 15 December 2022. Lennart Renbjär is deputy chair, and Helena Fond, Hans Peter Larsson and Lars Silver are ordinary members.

The alternate members are Hanna Björknäs, Hans Lindblad and Marie-Louise Strömgren.

The post of chair was vacant for most of 2022. Claes Norberg was deputy chair of the Council until 15 December 2022 and served as chair during 2022.

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 fourteenth 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 2022.

Swedish Better Regulation Council



Anna-Lena Bohm
chair since December 2022



Claes Norberg
deputy chair until December 2022



Lennart Renbjer
deputy chair since December 2022



Helena Fond
member



Hans Peter Larsson
member



Lars Silver
member



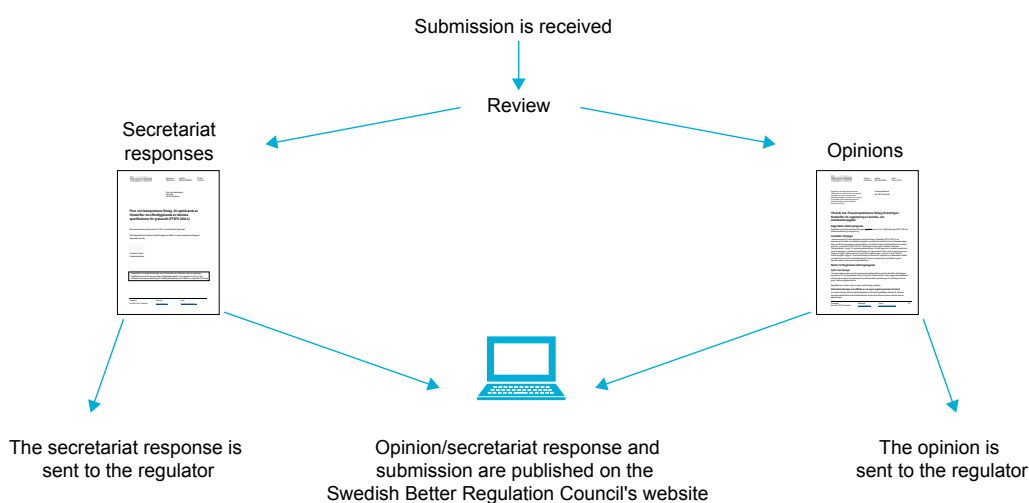
Christian Pousette
director

1

Reviews in practice

Government ministries and authorities shall refer proposals for new and amended regulations that may have a significant impact on businesses to the Swedish Better Regulation Council. For government authorities, this is governed by Ordinance (2011:118) regarding government authorities obtaining opinions from the Swedish Better Regulation Council, while for government ministries it is governed 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 businesses that the Council should issue an opinion. Effects of significance for businesses include both economic and other effects. If the proposal is deemed to have effects of significance for businesses, 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 businesses 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 businesses 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 Ordinance (2011:118) regarding government authorities obtaining opinions 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.¹

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.

¹ There are some exceptions to this.

Review of impact assessments drawn up at the 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 the EU level that are deemed to have a major impact on businesses 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 businesses in Sweden and which aspects need to be specifically reviewed in this.

Communication

The Swedish Better Regulation Council has a website² 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 2022.

The Council's newsletter, Regelrätt, is published six times a year and has approximately 800 subscribers. Subscribers may be people working in government authorities or ministries, organisations or others interested in the activities of the Council. In 2022, Regelrätt was redesigned to include articles and an international outlook, in addition to information on the opinions of the Council and an interview with a person who is currently prominent in the field of impact assessment. The format was also changed to a mailing.

² www.regelradet.se



2

International collaboration

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 the national and global level through exchange of experience and advocacy. The focus is on impact assessment and evaluation of regulations, and includes both support and review.

The work in 2022 was carried out under the Czech chairmanship. It was characterised by experience and evaluation of crisis legislation and behavioural, institutional and strategic issues. Among other things, RWE carried out an overview study of covid-related legislation in the various RWE countries. The study included comparisons of concrete decisions, such as different types of bans, requirements and restrictions and possibilities for financial support, as well as comparisons of consultation procedures, impact assessment, review and evaluation of measures taken. The conclusion that can be drawn is that there are significant similarities, but also significant differences, between the different countries. For example, most countries initially adopted a relatively generous approach to financial compensation to companies, and later tightened the rules when it became clear that abuses were a high risk. Most countries introduced sunset clause rules, most of which extended and changed on several occasions, often at very short notice, which was perceived by stakeholders as worrying. Several countries used various fast tracks, such as including temporary exemptions from impact assessment requirements and the usual consultation processes and, in some cases, the introduction of evaluation requirements retrospectively. The RWE study was used, among other things, as a basis for discussion at a workshop organised as part of the Directors and Experts of Better Regulation (DEBR) conference on 8–9 September, in which RWE participated.

Lack of trust, poor communication, insufficient analytical capacity and fear of making mistakes are some of the factors that create institutional resistance to change, even where there is actually a general consensus on the need for change. Among the conclusions of the two RWE workshops on institutional resistance are that it is essential to create a culture of interdepartmental trust and that international comparisons and pressure coupled with genuine political commitment can play an important role. It is also important to highlight that savings in the form of limited resources for impact assessments are made at the expense of increased costs and other downstream challenges. This is something the Swedish Better Regulation Council stands behind.

Furthermore, in 2022, a comprehensive review and further development of the RWE website and a logo was adopted.

As Sweden will take over chairmanship of RegWatchEurope in 2023, a lot of time was spent on preparations for this.

RWE workshops often attract participation from organisations other than RWE members. Review functions from other countries, representatives from the European Commission, the European Commission's Regulatory Scrutiny Board, and the OECD Regulatory Policy Committee also regularly participate in RWE's activities and RWE has regular contacts with representatives from these bodies. RWE also aims to establish more regular contacts with the European Parliament and the EU Council of Ministers, not least on the basis of commitments in the 2016 Interinstitutional Agreement on Better Lawmaking, which RWE believes these two latter EU bodies are failing to meet.

Contacts and exchanges of experience with counterparts in other countries and international institutions contribute valuable insights to the Council on the challenges and possible solutions that exist regarding the investigation, disclosure and review of impacts resulting from regulations. In view of the increasing complexity of legislation, its cross-border nature and global opportunities and challenges for businesses and regulators alike, the importance of international cooperation is growing.



REGWATCHEUROPE MEMBERS



The Swedish Better Regulation Council, SBRC



The Dutch Advisory Board on Regulatory Burden, ATR



The German Regulatory Control Council, NKR



The Regulatory Policy Committee, RPC



The Norwegian Better Regulation Council, NBRC



The Czech Regulatory Impact Assessment Board, RIAB



The Finnish Council of Regulatory Impact Assessment, FCRIA



The Danish Business Regulations Forum, DBRF

3

Reviews in figures

In 2022, the Swedish Better Regulation Council dealt with 303 submissions. Of these, 172 resulted in an opinion (representing 57 per cent) and 131 resulted in a secretariat response (representing 43 per cent).

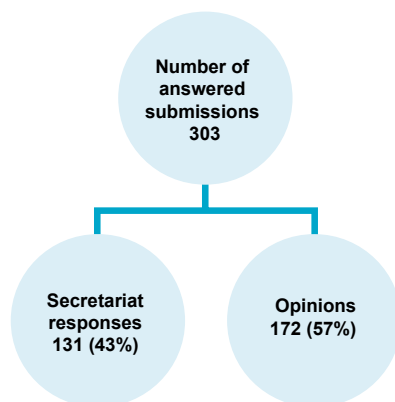


Figure 1: Answered submissions 2022.

Opinions

Of the 172 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 67 per cent. The result is an improvement compared to 2021, when 58 per cent of the impact assessments were considered to meet the requirements.

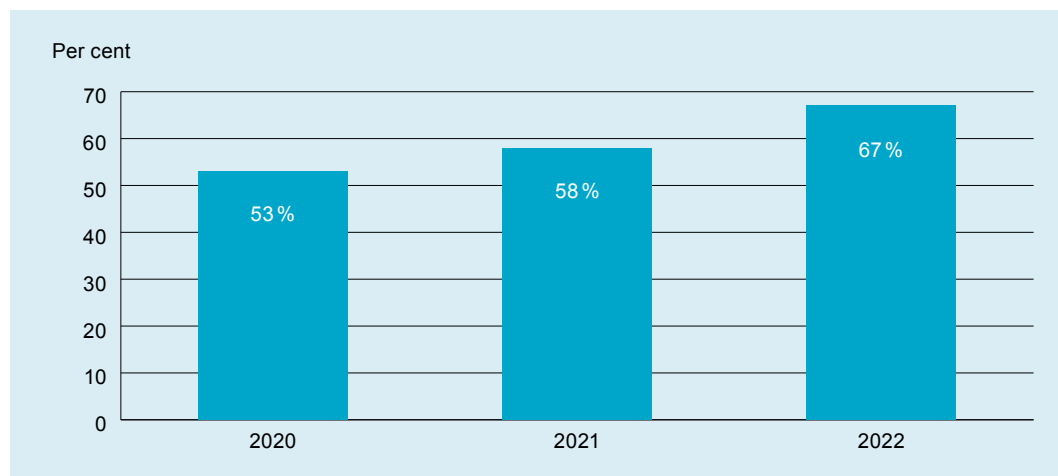


Figure 2: The Council's evaluation of impact assessments in 2020, 2021 and 2022; proportion that met the requirements.

Results by aspect

Aspect	Number Acceptable	Number Deficient	Proportion acceptable (%)
Purpose	170	2	99 %
Effects if no regulation is issued	166	6	97 %
Consistency with EU law	162	10	94 %
Effects in other respects	160	12	93 %
Affected companies by industry	158	14	92 %
Alternative solutions	156	16	91 %
Particular attention to the date of entry into force	155	17	90 %
Provision of special information	139	33	81 %
Changes in business activities	135	37	78 %
Number of companies affected	131	41	76 %
Other costs	124	48	72 %
Administrative costs	118	54	69 %
Special attention for small businesses	118	54	69 %
Impact on competition	105	67	61 %
Size of the companies affected	98	74	57 %

Figure 3: The Council's evaluation per aspect 2022, 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 (94%),
- Effects in other respects (93%),
- Affected companies by industry (92%),
- Alternative solutions (91%),
- Particular attention to the date of entry into force (90%), and
- Provision of special information (81%).

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

- Size of the companies affected (57%),
- Impact on competition (61%),
- Special attention for small businesses (69%),
- Administrative costs (69%),
- Other costs (72%),
- Number of companies affected (76%), and
- Changes in business activities (78%).

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-prepared 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 and intended for adoption by Parliament or the Government. 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 172 submissions leading to opinions in 2022 were distributed as follows:

- 52 submissions prepared internally within the Government Offices of Sweden
- 22 official government reports (SOU)
- 10 government authority reports
- 88 government authority regulations



Distribution of opinions

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	52	30 %	33	19	63 %
Official government reports	22	13 %	11	11	50 %
Government authority reports	10	6 %	4	6	40 %
Government authority regulations	88	51 %	68	20	77 %

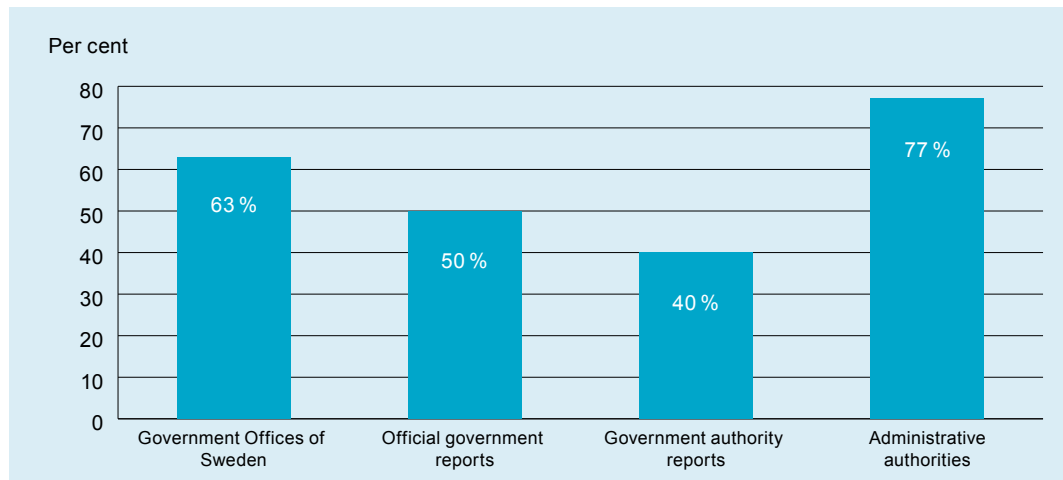


Figure 4: Distribution of opinions and proportion that met the requirements, 2022.



Government Offices of Sweden

The Council gave its opinion on the impact assessments in 52 submissions prepared internally at the Government Offices of Sweden. Of these, 33 (representing 63 per cent) were deemed to meet the KUF requirements. By comparison, 36 out of 72 (50 per cent) were deemed to meet the requirements in 2021 and 25 out of 55 (45 per cent) did so in 2020.

GOVERNMENT OFFICES OF SWEDEN		Number	Number	Number
Ministry		Meets requirements	Does not meet requirements	Total
Ministry of Employment		0	1	1
Ministry of Finance		24	8	32
Ministry of Infrastructure		4	0	4
Ministry of Justice		1	0	1
Ministry of Culture		1	2	3
Ministry of the Environment		2	5	7
Ministry of Enterprise		1	1	2
Ministry of Health and Social Affairs		0	1	1
Ministry for Foreign Affairs		0	1	1
Total		33	19	52

Figure 5: The Swedish Better Regulation Council's opinions on the internally-prepared submissions of the Government Offices of Sweden, 2022.

Official government reports (SOU)

The Council gave its opinion on the impact assessments in 22 official government reports. Of these, 11 (representing 50 per cent) were deemed to meet the KUF requirements. By comparison, 21 out of 38 (55 per cent) were deemed to meet the requirements in 2021 and 10 out of 24 (42 per cent) did so in 2020.

OFFICIAL GOVERNMENT REPORTS		Number	Number	Number
Ministry		Meets requirements	Does not meet requirements	Total
Ministry of Employment		2	0	2
Ministry of Finance		1	1	2
Ministry of Infrastructure		0	1	1
Ministry of Justice		4	0	4
Ministry of the Environment		0	2	2
Ministry of Enterprise		2	2	4
Ministry of Health and Social Affairs		2	4	6
Ministry of Education and Research		0	1	1
Total		11	11	22

Figure 6: The Swedish Better Regulation Council's opinions on official government reports by referring government ministries, 2022.

Government authority reports

The Council gave its opinion on the impact assessments in 10 government authority reports. Of these, 4 (representing 40 per cent) were deemed to meet the KUF requirements. By comparison, 3 out of 12 (25 per cent) were deemed to meet the requirements in 2021 and 4 out of 7 (57 per cent) did so in 2020.

GOVERNMENT AUTHORITY REPORTS	Number	Number	Number
Referring ministry and responsible administrative authority	Meets requirements	Does not meet requirements	Total
Ministry of Finance / National Board of Housing, Building and Planning	1	0	1
Ministry of Infrastructure / Swedish Energy Markets Inspectorate	1	0	1
Ministry of Infrastructure / Swedish National Grid	0	1	1
Ministry of Infrastructure / Swedish Transport Administration	0	1	1
Ministry of the Environment / Swedish Chemicals Agency	1	0	1
Ministry of the Environment / Swedish Environmental Protection Agency	1	2	3
Ministry of Health and Social Affairs / National Board of Health and Welfare	0	1	1
Ministry of Health and Social Affairs / Medical Products Agency	0	1	1
Total	4	6	10

Figure 7: The Swedish Better Regulation Council's opinions on government authority reports by referring ministry and responsible authority, 2022.

Government authority regulations

The Council gave its opinion on the impact assessments in 88 submissions from government authorities. Of these, 68 (representing 77 per cent) were deemed to meet the KUF requirements. By comparison, 56 out of 78 (72 per cent) were deemed to meet the requirements in 2021 and 39 out of 61 (64 per cent) did so in 2020.

GOVERNMENT AUTHORITIES			
Authority	Number Meets requirements	Number Does not meet requirements	Number Total
Swedish Work Environment Authority	0	1	1
Swedish Companies Registration Office	1	0	1
National Board of Housing, Building and Planning	0	1	1
National Electrical Safety Board	1	0	1
Swedish Energy Markets Inspectorate	10	1	11
Swedish Energy Agency	1	0	1
Swedish Financial Supervisory Authority	1	1	2
Public Health Agency of Sweden	1	0	1
Swedish Agency for Marine and Water Management	7	3	10
Swedish Board of Agriculture	8	0	8
Swedish Chemicals Agency	0	2	2
Swedish Food Agency	1	1	2
Medical Products Agency	1	1	2
Swedish Civil Contingencies Agency	1	1	2
Swedish Agency for Accessible Media	1	0	1
Swedish Environmental Protection Agency	1	3	4
Swedish Post and Telecom Authority	6	0	6
Swedish National Debt Office	2	0	2
Swedish Maritime Administration	1	0	1
Swedish Tax Agency	4	0	4
National Board of Health and Welfare	3	0	3
Swedish Gambling Authority	0	1	1
Statistics Sweden	6	1	7
Swedish Radiation Safety Authority	0	1	1
Geological Survey of Sweden	0	1	1
Swedish Board for Accreditation and Conformity Assessment	2	1	3
Swedish Transport Administration	4	0	4
Swedish Transport Agency	5	0	5
Total	68	20	88

Figure 8: The Swedish Better Regulation Council's opinions on government authority regulations, 2022.

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-prepared 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 71 per cent (need for provision of special information) and 98 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 48 per cent, while the description of affected companies by industry has the highest proportion of acceptable descriptions at 90 per cent.
- When comparing with the 2021 results, it can be noted that the main improvements relate to the description of affected companies by number (+18 percentage points), the proposal's impact on the administrative costs of companies, and the effects in other respects (both +17 percentage points). There is only one deterioration regarding the description of individual aspects, and this regards the description of the proposal's impact on competitive conditions for the affected companies (-5 percentage points).

GOVERNMENT OFFICES OF SWEDEN (prepared internally)		Number	Number	Proportion
Results by aspect and regulator		Acceptable	Deficient	acceptable (%)
Purpose		51	1	98 %
Effects if no regulation is issued		49	3	94 %
Particular attention to the date of entry into force		48	4	92 %
Affected companies by industry		47	5	90 %
Consistency with EU law		47	5	90 %
Effects in other respects		46	6	88 %
Alternative solutions		45	7	87 %
Changes in business activities		41	11	79 %
Number of companies affected		37	15	71 %
Other costs		37	15	71 %
Provision of special information		37	15	71 %
Administrative costs		33	19	63 %
Special attention for small businesses		27	25	52 %
Impact on competition		25	27	48 %
Size of the companies affected		25	27	48 %

Figure 9: The Swedish Better Regulation Council's assessment by aspect, internally-prepared submissions by the Government Offices of Sweden, 2022.

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, the aspects of Section 6 of the KUF are described relatively well for official government reports. The acceptable proportions are between 73 per cent (need for provision of special information) and 100 per cent (description of the background and purpose of the proposal and effects if no regulation is issued).
- In relation to aspects of Section 7 of the KUF, like last year, the lowest proportion of acceptable descriptions is found in the description of the impact on the administrative costs of companies, with a proportion of 45 per cent. The highest proportion of acceptable partial descriptions is found in the description of the proposal's effects in other respects, with a proportion of 95 per cent.
- When comparing with the 2021 results, it can be noted that the greatest improvements can be seen in the descriptions of the proposal's effects in other respects (+27 percentage points), the need for provision of special information (+18 percentage points) and impact on competition (+17 percentage points). The deteriorations are only by a few percentage points and relate to the description of the proposal's consistency with EU law (- 4 percentage points) and impact on administrative costs (-2 percentage points).

OFFICIAL GOVERNMENT REPORTS (SOU)	Number	Number	Proportion
Results by aspect and regulator	Acceptable	Deficient	acceptable (%)
Purpose	22	0	100 %
Effects if no regulation is issued	22	0	100 %
Particular attention to the date of entry into force	21	1	95 %
Effects in other respects	21	1	95 %
Affected companies by industry	20	2	91 %
Consistency with EU law	20	2	91 %
Alternative solutions	20	2	91 %
Provision of special information	16	6	73 %
Number of companies affected	15	7	68 %
Changes in business activities	15	7	68 %
Special attention for small businesses	14	8	64 %
Impact on competition	14	8	64 %
Other costs	13	9	59 %
Size of the companies affected	11	11	50 %
Administrative costs	10	12	45 %

Figure 10: The Swedish Better Regulation Council's assessment by aspect, official government reports, 2022.

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 vary between 60 per cent (need for provision of special information) and 100 per cent (description of background and purpose of the proposal).
- Regarding descriptions of company aspects in Section 7 of the KUF, the acceptable proportions range from 30 per cent (affected companies by size and impact on competition) and 90 per cent (affected companies by industry).
- When comparing with the 2021 results, it can be noted that there are improvements regarding the description of whether special attention needs to be given to small businesses when formulating the regulations (+45 percentage points), whether the proposal will require changes in business activities (+20 percentage points), and the proposal's effects on other costs of companies (+18 percentage points). The main deteriorations relate to the proposal's impact on competition (-37 percentage points), effects if no regulation is issued (-10 percentage points) and affected companies by number (-8 percentage points).

GOVERNMENT AUTHORITY REPORTS			
Results by aspect and regulator	Number Acceptable	Number Deficient	Proportion acceptable (%)
Purpose	10	0	100 %
Effects if no regulation is issued	9	1	90 %
Consistency with EU law	9	1	90 %
Affected companies by industry	9	1	90 %
Alternative solutions	8	2	80 %
Effects in other respects	7	3	70 %
Particular attention to the date of entry into force	7	3	70 %
Changes in business activities	7	3	70 %
Special attention for small businesses	7	3	70 %
Provision of special information	6	4	60 %
Other costs	6	4	60 %
Number of companies affected	5	5	50 %
Administrative costs	5	5	50 %
Impact on competition	3	7	30 %
Size of the companies affected	3	7	30 %

Figure 11: The Swedish Better Regulation Council's assessment by aspect, government authority reports, 2022.

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 90 per cent (need for provision of special information) to 99 per cent (background and purpose of the proposal).
- Regarding descriptions relating to Section 7 of the KUF, these range from 67 per cent (affected companies by size) and 98 percent (effects in other respects).
- When comparing with the 2021 results, improvements have been noted in relation to descriptions of affected companies by size (+14 percentage points), administrative costs (+13 percentage points) and impact on competition (+12 percentage points). The deteriorations are only by a few percentage points and relate to, for example, the description of whether particular attention needs to be paid to the date of entry into force (-5 percentage points).

GOVERNMENT AUTHORITY REGULATIONS			
Results by aspect and regulator	Number Acceptable	Number Deficient	Proportion acceptable (%)
Purpose	87	1	99 %
Effects if no regulation is issued	86	2	98 %
Consistency with EU law	86	2	98 %
Effects in other respects	86	2	98 %
Alternative solutions	83	5	94 %
Affected companies by industry	82	6	93 %
Provision of special information	80	8	91 %
Particular attention to the date of entry into force	79	9	90 %
Changes in business activities	74	14	84 %
Number of companies affected	74	14	84 %
Administrative costs	72	16	82 %
Special attention for small businesses	70	18	80 %
Other costs	70	18	80 %
Impact on competition	65	23	74 %
Size of the companies affected	59	29	67 %

Figure 12: The Swedish Better Regulation Council's assessment by aspect, government authority regulations, 2022.

Secretariat responses

Pursuant to Section 17 of the Ordinance (2009:145) with instructions for the Swedish Agency for Economic and Regional Growth, the Swedish Better Regulation Council shall give its opinion on impact assessments that have been prepared in accordance with Section 15a of the Committees Ordinance (1998:1474) or Sections 6 and 7 of the Ordinance on Regulatory Impact Assessment (2007:1244) and that have formed the basis for a proposal for regulations that may have effects of significance for businesses.

It is not uncommon for regulations that are not considered to have an impact on businesses to be submitted. In such cases, 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. 9 for more information on the different reasons for answering a submission with a secretariat response,

In 2022, the Council answered 131 submissions with secretariat responses.

- In 100 of the secretariat responses, corresponding to 76 per cent, the reason was limited effects for companies.
- In 19 of the secretariat responses, corresponding to 15 per cent, the reason was resource constraints.
- In 4 of the secretariat responses, corresponding to 3 per cent, the reason was time constraints.
- 8 of the secretariat responses, corresponding to 6 per cent, fell under the category Other.³

SECRETARIAT RESPONSES	2022	2022
Reason for secretariat response	Number	Proportion (%)
Limited effects	100	76 %
Resource constraints	19	15 %
Time constraints	4	3 %
Other	8	6 %
Total	131	100 %

Figure 13: Reason for secretariat response, 2022.

³ 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 the EU level

In 2017–2018, the Swedish Better Regulation Council followed up on the task of reviewing impact assessments prepared at the EU level.⁴ The follow-up led to a request, which was prepared jointly with the Swedish Agency for Economic and Regional Growth.⁵ 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 the 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 view of this, and pending a revised mandate, all impact assessments prepared at the EU level have been answered with a secretariat response for the period 2019 to autumn 2021 due to resource constraints.

In 2022, 15 draft impact assessments prepared at the EU level were received via the regular consultation process from the responsible Swedish ministry. Of these, 4 were answered with a secretariat response⁶ and 11 with a simplified opinion. The Swedish Better Regulation Council revised its review procedure for impact assessments drawn up at the EU level, and now carries out a more cursory review than was previously the case. One focus of the review is whether a supplementary Swedish impact assessment should be prepared at this stage of the process, to further describe the effects on Swedish companies. Generally speaking, the Swedish Better Regulation Council's starting point is that the effects on Swedish companies need to be described. The Council therefore usually recommends that a supplementary Swedish impact assessment be drawn up, and preferably at as early a stage in the process as possible. If necessary, the impact assessment can then be revised during the negotiations. The impact assessment then also serves as a support in the negotiation process, and can also facilitate the consultation process. With such an approach, the early impact assessment can serve as a basis for the “final” impact assessment, which is prepared in the course of the national implementation of the piece of EU legislation.

However, there are exceptions to this recommendation. In one submission, the Council refrained from making such an explicit recommendation because it could be concluded from the government ministry's fact memorandum that a supplementary Swedish impact assessment was already in progress, which the Council supported.⁷ In another submission, the nature of the proposal had a bearing on the Council's assessment. The proposal was for a regulation on an emergency instrument for the internal market.⁸ The Swedish Better Regulation Council determined that the impact assessment contained detailed qualitative accounts of the effects, but beneficial and costs, that could be expected. The Commission outlined uncertainties about the nature of future emergencies and therefore which companies and sectors would be affected. The impact assessment also included specific considerations for small and medium enterprises. It was made clear that impact assessments would be carried out upon adoption of more specific implementing acts in the event of activation of the emergency provisions. In the light of all these circumstances, the Swedish Better Regulation Council found that a supplementary national impact assessment was not necessary at this stage of the process, but that such a need will exist in the context of the adoption of any implementing acts.

The Council also continues to believe that an appropriate system needs to be developed for the national impact assessment process for EU proposals, including when the Council will be involved in the process.

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

⁵ 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 the EU level*.

⁶ One submission was answered with a secretariat response due to time constraints and three due to resource constraints.

⁷ The Ministry of the Environment's submission on the European Commission's proposal for a regulation on nature restoration, case number, RR 2022-179, decision at the Council meeting on 26 October 2022.

⁸ The Ministry for Foreign Affairs submission on the European Commission's proposal for an emergency instrument for the internal market, case number RR 2022-228, decision at the Council meeting on 12 October 2022.



4

Reflections on the year of operation 2022

By the end of the 2022 operating year, opinions account for 57 per cent of the responses to submissions received, which is slightly higher than in previous years.⁹ The statistics show that the proportion of acceptable impact assessments is 67 per cent, which is an improvement of 9 percentage points compared to 2021.¹⁰ As usual, the results vary between the referring regulators. Compared to last year, the internally-prepared submissions of the Government Offices of Sweden show the biggest improvement in terms of proportion of acceptable impact assessments, with 63 per cent of impact assessments being acceptable this year.¹¹ Official government reports drop slightly compared to last year, with half of the impact assessments being acceptable.¹² For government authorities, the results are in line with, or slightly higher than, their performance over the last five years.¹³ The category government authority reports¹⁴ showed improved results – but this category is difficult to assess as the number of submissions was also low this year (10 submissions). It is therefore difficult to draw any far-reaching conclusions from the results. However, the Swedish Better Regulation Council notes that, like last year, it is the category with the lowest proportion of acceptable impact assessments. The Council also notes that official government reports have a worse performance than both the memorandums prepared internally by the Government Offices of Sweden and the government authority regulations. In this context, the Council would therefore like to point out the importance of ministries being clear in their orders – both in committee terms of reference and in the terms of reference issued to authorities – regarding the expectations of the inquiries, descriptions and calculations to be made in connection with the assignment. With clearer orders and reasonable timeframes, there is a greater chance that the deliverables back to the ministries will be of higher quality.

In terms of impact assessment work in general, the inquiry on a simpler regulatory framework for micro-enterprises and a more modern Bookkeeping Act submitted its report in 2021.¹⁵ In addition, the previous government submitted a letter to the Parliament with new simplification targets.¹⁶ The Swedish Better Regulation Council therefore saw steps that could lead to improved impact assessment work already in 2021. In 2022, proposals were made in the memorandum Better impact assessments.¹⁷ It is worth mentioning that the Council issued specific opinions on both of these referrals.¹⁸

Generally speaking, the Swedish Better Regulation Council is in favour of more discussion of issues related to impact assessment. As the Council has previously stated, it is a management issue for each regulator to prioritise work to investigate the impact of the new and amended regulations proposed. This includes, for example, allocating sufficient time and resources to the work. Commitment needs to come from the top and permeate the whole organisation. As the statistics show, the ministries are underperforming in their own regulatory work. Given that it is crucial that there is a will and commitment from the top, the Council notes that the new government has made statements that the regulatory burden and administration needs to be reduced to allow companies and entrepreneurs to focus on their core business as much as possible.¹⁹

As the Council reviews the reflections of previous years at the end of another operating year, it is clear that more progress has been made in some areas than in others. The Council maintains the importance of the previous reflections and intends to continue the qualitative follow-up in future annual reports.

9 In 2022, 303 submissions were answered, of which 172 (corresponding to 57%) were with an opinion. In 2021, 375 submissions were answered, of which 200 (corresponding to 53%) were with an opinion. In 2020, 390 submissions were answered, of which 147 (corresponding to 38%) were with an opinion. In 2019, 311 submissions were answered, of which 154 (corresponding to 50%) were with an opinion. In 2018, 307 submissions were answered, of which 151 (corresponding to 49%) were with an opinion.

10 Proportion of acceptable impact assessments 2022: 67%. 2021: 58%. 2020: 53%. 2019: 66%. 2018: 56%.

11 Government Offices of Sweden, proportion of acceptable impact assessments prepared internally 2022: 63%. 2021: 50%. 2020: 45%. 2019: 60%. 2018: 35%.

12 Official government reports, proportion of acceptable impact assessments 2022: 50%. 2021: 55%. 2020: 42%. 2019: 41%. 2018: 65%.

13 Government authority regulations, proportion of acceptable impact assessments 2022: 77%. 2021: 72%. 2020: 64%. 2019: 77%. 2018: 62%.

14 Government authority reports, proportion of acceptable impact assessments 2022: 40%. 2021: 25%. 2020: 57%. 2019: 50%. 2018: 82%.

15 Simplification for micro-enterprises and modernisation of the Bookkeeping Act (SOU 2021:60).

16 Government written communication 2021/22:3, A simplification policy for increased competitiveness, growth and innovation capacity.

17 Ministry of Finance memorandum Better impact assessments (Ds 2022:22).

18 RR 2022-4, decision at the Council meeting on 26 January 2022, and RR 2022-207, decision at the Council meeting on 21 December 2022.

19 Prop. 2022/23:1, Budget proposal for 2023, p. 21.

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. This year's results show a slight decline in the proportion of acceptable impact assessments in official government reports, compared to last year, and the Council finds that a result where one out of every two impact assessments fails to meet the requirements is remarkably low. Particularly given that official government reports often contain proposals that have a significant impact on businesses.

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. A few years ago, the Council noted progress in some terms of reference. However, the Council finds that there has been a decline in this area, and that the terms of reference often make clear what type of proposals are to be made. This means that other possible solutions to identified problems are not investigated. The recommendation in this respect therefore stands.

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. As the Council cannot see that any changes in working methods or processes have been implemented in this area, the recommendations previously made still stand.

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, so the Council's recommendation still stands.

The EU impact assessment process needs to be renewed

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

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 to date, so the Council's recommendation still stands.

The impact assessment process needs to be reviewed

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. However, as mentioned earlier in the annual report, the Council saw steps in the right direction in 2022 in terms of improving the quality of impact assessments. However, until proposals that could lead to concrete improvements have been implemented, the Council's recommendation stands.

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

The Council has previously recommended that there needs to be a necessary review of the regulatory costs for companies, 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. It is essential that proposers are aware of the elements that will arise as a result of a regulatory requirement. No such review has been initiated. The Council's recommendation therefore still stands.

ACTION NOT PERFORMED UNDER REMEDIAL ACTION ACTION PERFORMED

Table appendix

Opinions of the Swedish Better Regulation Council in 2022 by referring body and type of submission (assessment of impact assessment as a whole and by aspect)

Table 1: Government Offices of Sweden (prepared internally)

A = Acceptable, D = Deficient

Proposer	Overall assessment	Did not meet the requirements	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		Number of companies		Company size		Industry		Administrative costs		Other costs		Business activities		Competitive conditions		Other respects		Special attention for small businesses	
Ministry	Met the requirements		A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D
Ministry of Employment	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
Ministry of Finance	24	8	32	0	30	2	31	1	30	2	31	1	28	4	27	5	16	16	30	2	25	7	26	6	29	3	17	15	31	1	22	10
Ministry of Infrastructure	4	0	4	0	4	0	4	0	3	1	4	0	3	1	3	1	2	2	4	0	4	0	4	0	4	0	3	1	4	0	3	1
Ministry of Justice	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	1	0	1	0	1	0
Ministry of Culture	1	2	3	0	2	1	3	0	3	0	3	0	1	2	3	0	1	2	3	0	0	3	3	0	3	0	2	1	3	0	0	3
Ministry of the Environment	2	5	7	0	4	3	6	1	7	0	6	1	3	4	2	5	2	5	6	1	2	5	2	5	3	4	1	6	5	2	1	6
Ministry of Enterprise	1	1	2	0	2	0	2	0	1	1	1	1	0	2	0	2	2	0	1	1	0	2	0	2	1	1	1	1	2	0	0	2
Ministry of Health and Social Affairs	0	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	0	1	0	1
Ministry for Foreign Affairs	0	1	1	0	1	0	1	0	1	0	1	0	0	1	1	0	1	0	1	0	0	1	0	1	0	1	0	1	0	1	0	1
Total	33	19	51	1	45	7	49	3	47	5	48	4	37	15	37	15	25	27	47	5	33	19	37	15	41	11	25	27	46	6	27	25

Table 2: Official government reports

A = Acceptable, D = Deficient

Proposer	Overall assessment	Did not meet the requirements	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		Number of companies		Company size		Industry		Administrative costs		Other costs		Business activities		Competitive conditions		Other respects		Special attention for small businesses	
Ministry	Met the requirements		A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D
Ministry of Employment	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	1	2	0	2	0
Ministry of Finance	1	1	2	0	2	0	2	0	2	0	1	1	1	1	1	1	1	1	2	0	1	1	1	1	1	1	2	0	2	0	1	1
Ministry of Infrastructure	0	1	1	0	1	0	1	0	1	0	1	0	0	1	0	1	0	1	1	0	0	1	0	1	0	1	0	1	0	1	0	1
Ministry of Justice	4	0	4	0	4	0	4	0	4	0	4	0	4	0	4	0	4	0	4	0	3	1	4	0	4	0	4	0	4	0	4	0
Ministry of the Environment	0	2	2	0	0	2	2	0	1	1	2	0	1	1	0	2	0	2	1	1	0	2	1	1	1	1	1	1	2	0	1	1
Ministry of Enterprise	2	2	4	0	4	0	4	0	4	0	4	0	3	1	3	1	2	2	3	1	2	2	2	2	2	2	2	2	4	0	2	2
Ministry of Health and Social Affairs	2	4	4	0	6	0	6	0	6	0	6	0	5	1	5	1	2	4	6	0	2	4	3	3	4	2	3	3	6	0	4	2
Ministry of Education and Research	0	1	4	0	1	0	1	0	0	1	1	0	0	1	0	1	0	1	1	0	0	1	0	1	1	0	1	0	1	0	0	1
Total	11	11	4	0	20	2	22	0	20	2	21	1	16	6	15	7	11	11	20	2	10	12	13	9	15	7	14	8	21	1	14	8

Table 3: Government authority reports

A = Acceptable, D = Deficient


Proposer Referring ministry and responsible authority	Overall assessment Met the requirements	Did not meet the requirements	Pur- pose A	D	Alternative solutions A	D	Effects if no regulation is issued A	D	Consistency with EU law A	D	Particular attention to the date of entry into force A	D	Need for provision of special information A	D	Number of compa- nies A	D	Compa- ny size A	D	Industry A	D	Administrative costs A	D	Other costs A	D	Business activities A	D	Competitive conditions A	D	Other respects A	D	Special attention for small businesses A	D
Ministry of Finance / National Board of Housing, Building and Planning	1	0	1	0	1	0	1	0	1	0	1	0	0	1	0	1	0	1	1	0	1	0	1	0	1	0	1	0	1	0	1	0
Ministry of Infrastructure / Swedish Energy Markets Inspectorate	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
Ministry of Infrastructure / Swedish National Grid	0	1	1	0	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
Ministry of Infrastructure / Swedish Transport Administration	0	1	1	0	0	1	1	0	1	0	1	0	0	1	0	1	0	1	1	0	0	1	1	0	1	0	0	1	0	1	0	1
Ministry of the Environment / Swedish Chemicals Agency	1	0	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
Ministry of the Environment / Swedish Environmental Protection Agency	1	2	3	0	3	0	3	0	3	0	3	0	3	0	3	0	1	2	3	0	1	2	2	1	2	1	0	3	3	0	3	0
Ministry of Health and Social Affairs / National Board of Health and Welfare	0	1	1	0	1	0	1	0	1	0	1	0	1	0	0	1	0	1	1	0	0	1	0	1	1	0	1	0	1	0	0	1
Ministry of Health and Social Affairs / Medical Products Agency	0	1	1	0	1	0	1	0	1	0	0	1	0	1	0	1	0	1	1	0	1	0	0	1	0	1	0	1	0	1	1	0
Total	4	6	10	0	8	2	9	1	9	1	7	3	6	4	5	5	3	7	9	1	5	5	6	4	7	3	3	7	7	3	7	3

Table 4: Government authority regulations

A = Acceptable, D = Deficient

Proposer	Overall assessment	Did not meet the requirements	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		Number of companies		Company size		Industry		Administrative costs		Other costs		Business activities		Competitive conditions		Other respects		Special attention for small businesses		
Authority	Met the requirements		A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D	A	D	
Swedish Work Environment Authority	0	1	1	0	1	0	1	0	1	0	0	1	1	0	0	1	0	1	1	0	0	1	0	1	0	1	0	1	1	0	1	0	
Swedish Companies Registration Office	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	1	0	1	0	1	0	
National Board of Housing, Building and Planning	0	1	1	0	1	0	1	0	1	0	1	0	1	0	1	0	0	1	1	0	0	1	0	1	0	1	1	0	1	0	1	0	
National Electrical Safety Board	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	
Swedish Energy Markets Inspectorate	10	1	10	1	10	1	10	1	10	1	10	1	10	1	10	1	9	2	10	1	10	1	9	2	10	1	9	2	10	1	9	2	
Swedish Energy Agency	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	0	1	1	0	1	0	1	0	1	0	1	0	1	0	1	0	
Swedish Financial Supervisory Authority	1	1	2	0	2	0	2	0	2	0	2	0	2	0	2	0	0	2	2	0	1	1	1	1	2	0	1	1	2	0	0	2	
Public Health Agency of Sweden	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	
Swedish Agency for Marine and Water Management	7	3	10	0	9	1	10	0	10	0	8	2	9	1	10	0	9	1	10	0	8	2	9	1	8	2	8	2	10	0	10	0	
Swedish Board of Agriculture	8	0	8	0	8	0	8	0	8	0	8	0	7	1	8	0	8	0	8	0	8	0	8	0	8	0	8	0	8	0	7	1	
Swedish Chemicals Agency	0	2	2	0	2	0	1	1	2	0	2	0	2	0	0	2	0	2	1	1	1	1	0	2	0	2	0	2	1	1	0	2	
Swedish Food Agency	1	1	2	0	2	0	2	0	2	0	2	0	2	0	1	1	1	1	2	0	1	1	1	1	1	1	1	1	2	0	1	1	
Medical Products Agency	1	1	2	0	2	0	2	0	2	0	2	0	1	1	2	0	1	1	2	0	1	1	1	1	2	0	1	1	2	0	2	0	
Swedish Civil Contingencies Agency	1	1	2	0	1	1	2	0	1	1	2	0	2	0	2	0	2	0	2	0	2	0	1	1	1	1	1	1	2	0	2	0	
Swedish Agency for Accessible Media	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	
Swedish Environmental Protection Agency	1	3	4	0	4	0	4	0	4	0	4	0	4	0	3	1	2	2	4	0	3	1	3	1	3	1	3	1	4	0	3	1	
Swedish Post and Telecom Authority	6	0	6	0	6	0	6	0	6	0	6	0	6	0	5	1	5	1	6	0	5	1	5	1	5	1	6	0	6	0	5	1	
Swedish National Debt Office	2	0	2	0	2	0	2	0	2	0	2	0	2	0	2	0	0	2	2	0	2	0	2	0	2	0	1	1	2	0	2	0	
Swedish Maritime Administration	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	
Swedish Tax Agency	4	0	4	0	4	0	4	0	4	0	4	0	4	0	4	0	4	0	4	0	4	0	4	0	3	1	4	0	4	0	4	0	
National Board of Health and Welfare	3	0	3	0	3	0	3	0	3	0	3	0	2	1	3	0	1	2	3	0	3	0	3	0	3	0	2	1	3	0	0	3	
Swedish Gambling Authority	0	1	1	0	1	0	1	0	1	0	0	1	0	1	1	0	0	1	1	0	0	1	0	1	1	0	0	1	1	0	0	1	
Statistics Sweden	6	1	7	0	6	1	7	0	7	0	6	1	6	1	7	0	6	1	7	0	6	1	6	1	7	0	6	1	7	0	5	2	
Swedish Radiation Safety Authority	0	1	1	0	0	1	1	0	1	0	0	1	1	0	1	0	1	0	1	0	0	1	0	1	0	1	0	1	0	1	0	1	0
Geological Survey of Sweden	0	1	1	0	1	0	1	0	1	0	0	1	1	0	0	1	0	1	1	0	0	1	0	1	0	1	0	1	1	0	0	1	
Swedish Board for Accreditation and Conformity Assessment	2	1	3	0	3	0	3	0	3	0	3	0	3	0	2	1	2	1	3	0	2	1	2	1	3	0	2	1	3	0	2	1	
Swedish Transport Administration	4	0	4	0	4	0	4	0	4	0	4	0	4	0	0	4	0	4	0	4	0	4	0	4	0	4	0	0	4	4	0	4	0
Swedish Transport Agency	5	0	5	0	5	0	5	0	5	0	4	1	4	1	5	0	4	1	5	0	5	0	5	0	5	0	5	0	5	0	5	0	
Total	68	20	87	1	83	5	86	2	86	2	79	9	80	8	74	14	59	29	82	6	72	16	70	18	74	14	65	23	86	2	70	18	





The Swedish Better Regulation Council is a designated 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 businesses.

www.regelradet.se