



A new term of office brings new opportunities

Regulatory reforms for increased competitiveness and growth

A translated summary of NNR's report from March 2018

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NNR

BOARD OF SWEDISH
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FOR BETTER REGULATION
– CUTTING RED TAPE FOR BUSINESS –

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Summary

Since 2010, the Board of Swedish Industry and Commerce for Better Regulation (NNR) has instructed research agency Skop to perform annual surveys to monitor how businesses view regulatory developments. In recent years, the results from these surveys indicate a sharp rise in the number of businesses that report that things have become more complicated compared with those that think that things have become easier. Other surveys from the Swedish Agency for Economic and Regional Growth show that businesses face increased costs due to new rules and regulations, and that businesses regard laws and regulations as a major impediment to growth.

NNR's 2018 survey confirms the trend in recent years, with a few minor fluctuations. Twenty-nine percent of businesses found that things have become more complicated, while 2 percent believed that things have become easier. No follow-up questions were posed to find out why businesses found that things have become more complicated. A likely explanation is that the current government has focused less on better regulations than previous governments, and that it has presented several bills that have had, or might have, a negative impact on the business climate in Sweden.

The area of regulation where businesses have seen the greatest impediment to growth remains the area of tax and VAT, especially for businesses with 1–9 employees. Close behind this area are sector-specific rules, and it should be noted that these figures have doubled since 2015. It is mostly businesses with 50 employees or more that consider sector-specific rules to be significant impediments to growth.

When responding to the question regarding an increased expansion of their operations, a total of 55 percent of the responding businesses ticked the response that they would expect the number of employees to increase and sales to grow if regulatory frameworks change to significantly reduce the associated costs and risks. Most businesses with at least 50 employees believe that such a scenario would lead to better conditions for expansion.

Based on developments in recent years, other surveys conducted regarding the cost and effects of regulations, as well NNR's experiences, make it clear that the matter of better regulation should be given more attention in the policies of all parties. In doing so, this would help to improve the conditions for growth in society. To make this possible, several measures are required in different areas and on different levels in the governmental and municipal administrations, as presented by NNR in this report.

In the report, there are 27 recommendations which cover six areas: overarching principles (such as cost-effectiveness), accountability and leadership (such as a systematic evaluation of regulatory frameworks), new and amended rules (the work on impact assessments and EU legislation), improvements and simplifications of the existing regulatory framework (procedures and concrete proposals for improvement), the application of a regulatory framework by county administrative boards and municipalities and the work on rationalising and reducing businesses' provision of information.

NNR considers that the work must be conducted systematically and with a clear holistic perspective – a chain is only as strong as its weakest link. The foremost measure is to ensure that there is clear political leadership to drive the process. This is because there are many different regulatory frameworks, and several ministries and many agencies must join the campaign and provide their input in such a process. NNR and its members make their knowledge available to support any future government that truly wants to contribute to improved Swedish competitiveness with a greater number of growing businesses.

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NNR's system proposals for 2018 and beyond

Introduction and background

The Board of Swedish Industry and Commerce for Better Regulation (NNR) finds that the issue of basic conditions for businesses is a central factor in the creation of long-term conditions for a competitive business community. Globalisation and digitisation have made the design and application of various regulatory frameworks more significant, as nearly all businesses are faced with increasing competition from the international community. Because of these external changes, national regulatory frameworks are subject to competition from corresponding requirements in competing countries, a phenomenon usually referred to as 'institutional competition'. For this reason, conditions in Sweden cannot deviate long term from the corresponding conditions in the global arena.

NNR notes that many businesses consider that regulatory requirements present different kinds of problems for their operations. Since 2010, NNR has monitored developments using Skop, and noted that a growing number of businesses over time consider matters have become increasingly complicated, compared with the number of businesses that believe matters have become easier. This year's survey is presented in section 3 in page 10 of the Swedish version of the report.

Other surveys have captured the significance of this matter from a wider growth perspective. In 2017, the Swedish Agency for Economic and Regional Growth presented its triennial survey on conditions and reality for businesses that focuses on surveying various impediments to growth that businesses face in their operations. The results¹ from previous years show that the effect of regulatory frameworks comes second after access to labour, which is the main impediment to growth. The survey by the Swedish Agency for Economic and Regional Growth was directed at approximately 30,000 businesses, so it can be said to provide high-precision results. NNR finds that the issue of access to labour has a major political focus, while the issue of various regulatory frameworks that are considered to be impediments to growth is not sufficiently discussed in the political debate.

Over the past two decades, almost every government has raised the need to improve and simplify regulatory frameworks affecting businesses. It can be noted that the work has been conducted with different directions and varying results. Although the present government has, more or less, adopted the objectives of The Alliance government, one difference is that, in the most recent term of office, the work was not accompanied by any central leadership, and it was conducted with ad-hoc instructions to a few authorities only.

Regardless of who will be in government after the election in September 2018, NNR believes that systematic efforts are of the utmost importance to remedy various regulatory frameworks that lead to costs, create risks or otherwise have a dampening effect on the growth of businesses. After all, a great number of regulatory frameworks need reforming in various ways. From this perspective, NNR would like to highlight, in this report, the need for both system level measures and concrete proposals from NNR's member organisations.

¹ See page 20 <https://tillvaxtverket.se/download/18.6c7cba4d15e847bac579ed56/1506430418387/F%C3%B6retagens%20villkor%20och%20verklighet.pdf>

NNR's proposals for system level improvements

According to NNR, there is scope for significant improvements regarding the procedures that are followed and the tools used in relation to the work on existing rules and how the work on developing new rules is conducted. It believes that all efforts must be characterised by a strong system perspective, and, in light of this, several measures must be implemented to achieve a functioning whole – a chain is only as strong as its weakest link, as illustrated in Figure 1. Accordingly, the proposals listed in this section should be considered in light of the above.

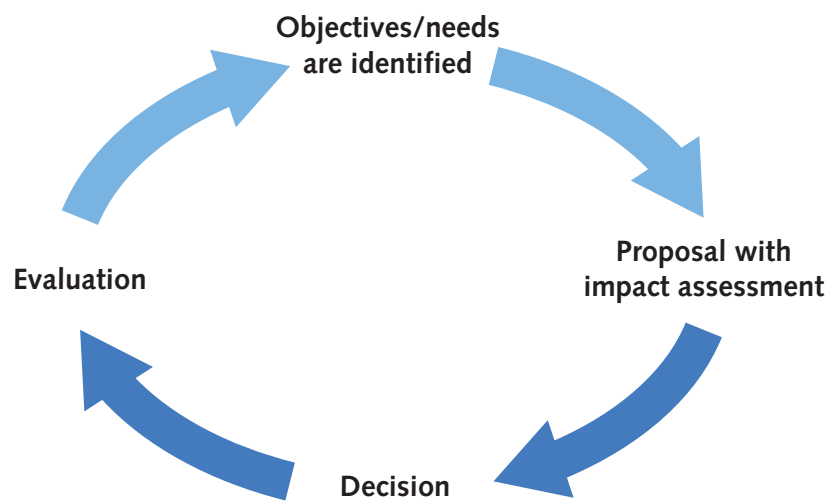


Figure 1. The regulatory chain.

Overarching requirements and principles

1. **The design of rules must be governed by a basic principle of cost-effectiveness, where all kinds of costs must be considered.**

When rules are discussed, there should be a requirement to strive for the maximum benefit possible, while also minimising any costs associated with the requirements in the regulatory framework in their entirety. Here, Sweden is lagging behind pioneering countries such as Canada and the USA in the efforts to take on a wider socio-economic perspective in the regulatory process.

2. **The regulator must always strive to choose the alternative that entails the lowest costs considering the objective.**

There is often more than one way to meet an indicated objective. This may involve the legislative proposals as such, but there may also be different options on a more detailed level. In connection with proposals and inquiries, it is important that such options are documented and presented to the external world.

3. **Regulatory frameworks must be proportionate regarding the balance between the objectives and the measures undertaken.**

Measures must consider the environments in which they are to be applied, and it is important that regulators consider other interests that may be affected by a proposal and realise that regulatory frameworks may affect a number of other objectives in society. If this is not the case, there is a significant risk of suboptimisations, resulting in costs to society. It should also

be noted that the principle of proportionality is governed by treaties and is therefore directly applicable in Sweden².

4. In the long term, the requirements in Swedish regulatory frameworks cannot deviate significantly from the corresponding requirements in other countries.

Through globalisation and digitisation, competition in various markets is on the increase, and nearly all businesses must consider international competitors. With increased dynamics, national institutions are subject to competition from around the world, often referred to as 'institutional competition'. If the conditions for affected businesses deviate materially from conditions in other countries, then the businesses' competitiveness will gradually be eroded.

Accountability, control and leadership

5. Systematically evaluate regulatory frameworks to achieve an efficient design.

In 2016, NNR presented the report 'Systematic evaluation – Taking political responsibility for more cost-effective regulations'³. Political decisions may go wrong, changes in other countries may entail new conditions and, over time, there may be unintended consequences. The report outlines the need for evaluations and how the government and the Riksdag (the Swedish Parliament) should escalate these matters to achieve high-quality independent evaluations. It should be emphasised here that, according to Chapter 4, Article 8 of the Instrument of Government, parliamentary committees have a clear responsibility to follow up on decisions that are made. Considering the huge number of rules and the structure of the country, with municipalities and counties, there are also reasons to evaluate how rules are applied by these authorities.

6. Reinforce and develop conditions for trying the constitutional dimension with regard to individual regulatory frameworks.

The design of the power to examine the government is vital in a democracy. In Sweden, the political power examines itself at a national level, chiefly by activities carried out by the Committee on the Constitution and its reviews. There are no true examining bodies at either municipal or regional levels. Accordingly, the main limitation to the adoption of a proposal is the majority that is required in the political assemblies. However, political decisions can go wrong, and NNR believes it would be beneficial, to both efficiency and the conservation of resources in the wider sense, if decisions on regulatory frameworks were subject to judicial review. From a constitutional perspective, the requirements in individual regulatory frameworks could therefore be subject to judicial review more easily than today.

7. Establish a structure process to handle and resolve conflicting objectives between different regulatory frameworks and between authorities.

The current regulatory framework affecting businesses is extensive, and there is a great number of authorities in various areas and on different levels, in regions and municipalities. Through the structure and wide preferential right of interpretation wide priority of interpretation granted to the authorities in various regulatory frameworks, the scope for interpretation is extensive. This means that authorities and civil servants which have their own interests to safeguard, may drive developments in a way that was not intended, and the application may give rise to conflicting objectives in other areas. Today's silo mentality has historic links all the way back to Axel Oxenstierna, when the foundation for the administration was laid,

² SE RÅ 1999, ref 76 och Bull och Sterzel a.a.s, 83 f.

³ http://nnr.se/wp-content/uploads/Systematisk_utvardering-Politiskt_ansvarstagande_for_effektivare_regler.pdf

but conflicting objectives may erode the credibility and legitimacy of regulatory frameworks. Resolving conflicting objectives in court is a very costly and time-consuming approach, where affected businesses may become trapped between different authorities and the requirements that, ultimately, must be considered in the individual case.

8. Create a cohesive procedure, which is owned and driven by government offices, to propel efforts forward and ensure they remain cohesive.

To progress the efforts for better regulations, NNR is of the view that a clear ownership and a cohesive procedure are needed, where each ministry has responsibility for certain subject areas. The government should submit a report to the Riksdag annually, reporting on the progress of the efforts.

Different tools and the need for a systematic process for the work in 2018 and beyond

The work on new and amended rules

The quality of impact assessments has been substandard for a long time. Poor impact assessments mean that members of parliament and other decision makers make decisions without knowing if the proposals that are presented are truly cost-effective. For this reason, rules may be ineffective and unnecessarily costly. Impact assessments must therefore improve and be given a clear role in the actual decision making. NNR's proposals to improve the quality of impact analyses are presented below. NNR's report 'Better-informed Decisions for Better Regulation⁴ – Measures for improved impact assessments' contains additional information and recommendations for measures required to achieve stronger efforts and quality in impact assessments, ultimately leading to clear and transparent rules.

9. Introduce a requirement to supplement and resubmit substandard impact assessments and strengthen the Swedish Better Regulation Council's mandate, organisation and conditions.

At present, there are no real opportunities to ensure that the regulatory framework for impact assessments is complied with, and demand for impact assessments has been low to date. According to NNR, the most important measure to change this would be to introduce a requirement to supplement and resubmit substandard impact assessments to the Swedish Better Regulation Council. However, this presupposes that the Swedish Better Regulation Council becomes more independent and is turned into a separate authority with its own appropriations and secretariat. The review process of the Swedish Better Regulation Council should also be extended and altered. The composition, resources and mandate of the Swedish Better Regulation Council should also be renewed and reinforced. The fees, expertise and weight of the Swedish Better Regulation Council are other issues that should also be addressed.

10. Strengthen the conditions for the work on impact assessments.

Committees of inquiry and ministries need sufficient resources for the work on impact assessments. Managers, investigators, etc., need training, and expertise on impact assessments should be made available through framework agreements or recruitment. Ministries and authorities must also build up expertise. More explicit instructions on impact assessments should

4 <http://nnr.se/wp-content/uploads/Ratt-underlag-for-ratt-beslut.pdf>

be included in terms of reference, handbooks and document templates, thereby providing a clearer image of the need for impact assessments and how they should be carried out. By prioritising resources in the system, so that requirements and the scope of impact assessments are higher for proposals with major economic importance and lower proposals with minor economic importance, efficiency gains are possible⁵.

11. Plan and carry out consultations at an early stage and use digital tools.

To make it easier for businesses and business organisations, etc., to submit their views on ongoing regulatory work, a strategy should be prepared for planned regulatory work by government offices and public authorities. Early consultations should also be systematic and carried out as mandatory supplements to consultations carried out at a later stage and to the referral procedure, for improved participation and dialogue with the business sector regarding problems and possible alternative solutions. The government should also use digital tools to increase transparency and participation in the regulatory process. A common website for all work on better regulations should be created. The European Commission web portal for its 'better regulation' agenda may serve as inspiration.

Swedish work on EU legislation

12. Alter the preparatory process, as conditions have changed fundamentally due to the membership of the EU.

The process for the Swedish work on EU legislation should be strengthened to increase Swedish influence on proposed EU legislation, thereby contributing to improved consideration of the conditions for and competitiveness of businesses. Read more about NNR's views on how the Swedish work on EU legislation can be reinforced in the report 'Better-informed Decisions for Better Regulation – Measures for improved impact assessments'⁶.

13. Create procedures for early and recurring consultations with the business community.

Early and recurring consultations and dialogues with the business community should occur during all stages of the work on EU legislation, from the design of EU legislation to its implementation into Swedish law. The business community should also be involved as early as possible to alert the government to upcoming EU legislative processes, where early influencing is important to ensure that directives and regulations are designed with consideration for better regulation principles and conditions for Swedish businesses.

14. Carry out Swedish impact assessments of proposed new EU rules.

To give Sweden more influence in the EU negotiation process and ensure that the Swedish position on proposed EU legislation is truly based on documentation that highlights the proposal's impact on Swedish businesses, NNR is of the view that Swedish impact assessments should be carried out on proposed EU rules. The Swedish Better Regulation Council's review of EU impact assessments and consultation with the business community could provide input to the Swedish impact assessment.

15. Clarify gold-plating.

To ensure that Sweden can implement EU legislation into Swedish law as effectively as possible for Swedish businesses, NNR is of the opinion that any gold-plating must be justified

5 http://www.tillvaxtanalys.se/download/18.201965214d8715afd14f1d7/1432722856994/Rapport_2012_03.pdf

6 <http://nnr.se/wp-content/uploads/Ratt-underlag-for-ratt-beslut.pdf>

and the effects be reported in an impact assessment. When EU legislation is implemented, it is therefore important to state how the proposal relates to EU law. In such cases, the impact assessment should include a description of the minimum level of the EU directive and an assessment of whether it will be exceeded. The assessment should be based on the criteria developed and described by NNR (and the Swedish Better Regulation Council) in the report 'Clarifying Gold-Plating – Better Implementation of EU Legislation'⁷.

NNR believes that, as a general rule, gold-plating should be avoided, as it leads to increasing differences and reduced transparency regarding the rules applicable on the internal market.

If, for any reason, the politicians and civil servants responsible consider exceeding the minimum level of the directive, the impact assessment must outline the reasons for it, describe the proposed implementing measures and carry out an assessment of its impact on businesses.

16. Establish a Swedish forum for discussions and advice on the implementation of EU legislation.

A forum should be created that is tasked with discussing and submitting advice to the government on how to implement the EU legislation in an effective manner and proposals for how legislation that has already been implemented can be simplified. Incorrect application of EU regulations should also be highlighted. An example of such a forum can be found in Denmark.

However, a forum cannot function on its own; in addition to political commitment and engagement, it also requires a procedure and a political recipient organisation that is capable of ensuring that the proposals are realised. Feedback and transparency, and a timetable for the feedback and implementation of adopted measures, are other important issues that should be addressed.

The work on improving existing rules

Continuous work is required to ensure that existing rules function as intended and are cost-effective, not least because many decisions are made based on insufficient documentation or without an impact assessment (which would show whether or not a proposal is cost-effective). In light of the changing world around us, it is also important to ensure that rules and regulations are up to date and do not create impediments to development.

17. Set objectives for the reduction of the regulatory burden.

To create pressure in the work on better regulation and on reducing the regulatory cost for businesses, objectives should be set for the reduction of the regulatory burden. A clear process and guidelines should be developed regarding how the objectives should be met, including clear instructions to ministries and authorities to meet the objectives. The objectives should be designed to cover all regulatory costs and be developed in dialogue with the business community.

⁷ http://nnr.se/wp-content/uploads/gold-plating_regelradet_nnr.pdf

18. Create a process to simplify and improve existing rules.

This is about both the systematic evaluation mentioned in item 5, but also about creating a process for continuous work on better regulation. The process and the work must include both ministries and authorities and requires strong political commitment.

A forum should be created for the collection, discussion and advice on proposed regulatory improvements/simplifications for the business community. The aim of the forum should be to achieve a simplification of rules applicable to the business community, with consideration of the purpose of the rule. This work requires a political recipient function and process that is responsible for handling the received proposals for better regulation and the forum's recommendations. The principle for handling the proposals must be to comply or explain, i.e. the government must implement the proposed regulatory simplifications/improvements or explain publicly why they do not intend to do so. Clear time plans, transparency and feedback to the business community and other stakeholders are important factors that help to create credibility and results. Good examples include the Danish Virksomhedsforum and the European Commission's REFIT Platform, which is an advisory group of experts.

Regulatory application of municipalities and county administrative boards

Businesses are subject to many different regulatory frameworks, developed by various independent authorities, which in turn are applied by municipalities and county administrative boards. For this reason, uniformity and effectiveness are not always as good as they could be. The government should adopt overarching objectives for the authorities' supervisory and licensing work, such as specific requirements on efficiency, a reduced administrative burden for businesses, focusing resources where their application is most beneficial and increases in transparency (read more about this in NNR's review report on the application of regulations in Sweden's municipalities⁸). If the differences in application are too great, the government and regulating authorities must evaluate and be prepared to undertake measures to counteract the problems.

19. Increase the work on reaching a consensus between authorities to reduce the differences in the application of national rules and regulations.

The work on reaching a consensus should be based on the idea that two administrators within the same authority should counteract the differences in the application by discussing and comparing views on concrete matters. It must be possible to expand this intra-authority process across different authorities and regional borders to reach a greater consensus and a reduced number of differences.

Digitisation must be used to create transparency and effectiveness in the authorities' application of the regulatory frameworks. By making anonymised authority decisions public, businesses can query any differences and the most efficient authorities will serve as good examples. Also, the work of the authorities must be rendered more efficient by allowing businesses to monitor the administration of their matters online, namely the use of opportunities inherent in digital decision support systems in the exercise of public authority, such as making court cases and guidelines for application easily accessible.

8 <http://kommungranskning.se/#rapporter>

20. Raise the service level of the authorities and introduce guarantees for this.

Local and regional authorities should have high ambitions for their advisory services, both related to specific matters and general guidance. 'One way into the municipality' (business pilots) is a good way of meeting businesses' requirements for guidance. 'Intelligent forms' that indicate when data are missing is one way of raising the service level, using the opportunities of digitisation. Public authority should be exercised in the shortest possible turnaround time and be subject to a guarantee from the authorities. The guarantee must be combined with a sanction in case of non-compliance.

21. Supervision should be proportionate and governed by risk.

Supervision should focus on businesses where there is an elevated risk of improper administration and/or there is an elevated risk of serious consequences in case of improper administration. For example, third-party certification and a good track record should make a difference in the risk assessment. If there are limited resources, a random selection implemented purely for reasons of fairness is less suitable. The resources used in, and the frequency of, supervision should be proportionate to the risk of the business.

Authorities should coordinate their supervisory activities in different areas of supervision to facilitate risk assessments. If a business is in good order in one area of supervision, there should be a presumption that the business is in good order in other supervisory areas too. The authorities should act as eyes and ears for each other in order to facilitate risk assessments.

22. Focus supervision on maximising regulatory compliance, not on finding and punishing errors.

Authorities must be aware that supervision has a limited effect on the objectives being met. For this reason, supervisory personnel should prioritise an attitude that inspires businesses to do the right thing.

23. Create transparency, and a clear service in return, in the fee structure.

There must be clear requirements on local and regional authorities to report the financial facts, and other statistics, in relation to their supervisory activities. The report must contain outcomes and plans for how the supervision is to be financed and be transparent, clear, complete and early.

Fees used to fund the exercise of public authority should have a clear link to the service provided in return, i.e. the actual working hours spent, and should be invoiced after the service has been provided. To businesses, there is a natural logic to charging fees after a service has been provided, thereby avoiding the loss of trust that often arises from standardised advance charges, which may seem like a subscription agreement with a varying or disappearing service in return.

24. Municipalities and county administrative boards should regularly evaluate the effects of their application of regulatory frameworks on the general public and businesses.

The evaluation should measure how well the objectives are met, i.e. improved security for the general public through fewer cases of food poisoning, not the number of inspection visits or criticisms. For an overarching systematic evaluation of rules and regulations.

Provision of information

Pursuant to various regulatory frameworks, Swedish businesses submit a large amount of data to the authorities, so it is important to work systematically to keep costs down for the affected businesses.

25. Improve the legal conditions for authorities to reuse data and information submitted by businesses to other authorities.

In Sweden, the issue of a data requirement register has been subject to inquiries in both 1998 and 2013. It should be noted that, on both occasions, the inquiry committees have not had the mandate to resolve the confidentiality problems caused by various ordinances regarding registers. NNR is of the opinion that measures must be implemented that truly solve this issue, as it prevents the digitisation of services that are necessary in the public sector.

26. The government must become better at guiding statistical agencies to retain knowledge of methods and spread new technology on tools required to collect corporate information.

The current system, which means that independent authorities are responsible for publishing statistics in various areas, means that several authorities may spend money on developing IT solutions for the same issue. Authorities have few incentives to learn from one another, and, in the long term, there are costs for both the businesses providing information and the government.

Concrete reforms

27. Make use of and implement the concrete proposals developed by NNR's members to improve the business climate in Sweden.

NNR has worked with its members to prepare a great number of proposals covering numerous regulatory frameworks and aspects impeding or involving costs for affected businesses⁹.

9 Näringslivets förslag till regelförbättringar i Sverige 2018-2022 <http://nnr.se/wp-content/uploads/Naringslivets-forslag-till-regelforbattringar-i-sverige-2018-2022.pdf>

Members of the Board of Swedish Industry and Commerce for Better Regulation, NNR

The Employers' Organisation for the Swedish Service Sector (Almega)
The Swedish Property Federation (Fastighetsägarna Sverige)
The Association of Swedish Finance Houses (Finansbolagens Förening)
The Swedish Investment Fund Association (Fondbolagens Förening)
The Swedish Federation of Business Owners (Företagarna)
The Federation of Swedish Farmers (Lantbrukarnas Riksförbund)
The Small Business Association (Småföretagarnas Riksförbund)
The Stockholm Chamber of Commerce (Stockholms Handelskammare)
Swedish Private Equity & Venture Capital Association, SVCA (SVCA)
Swedish Trade Federation (Svensk Handel)
The Swedish Industry Association (Svensk Industriförening)
The Swedish Bankers' Association (Svenska Bankföreningen)
The Swedish Securities Dealers Association (Svenska Fondhandlareföreningen)
The Swedish Petroleum & Biofuel Institute (Svenska Petroleum och Biodrivmedel Institutet)
The Confederation of Swedish Enterprise (Svenskt Näringsliv)
The Swedish Confederation of Transport Enterprises (Transportföretagen)
Visita – The Swedish Hospital Industry

The Board of Swedish Industry and Commerce for Better Regulation, NNR

The Board of Swedish Industry and Commerce for Better Regulation was formed in 1982 and is a politically independent non-profit organisation wholly financed by its members, which include 17 Swedish business organisations and trade associations together representing just over 300.000 companies. This means that NNR speaks for all active companies in Sweden with one or more employees; companies in every industry and of every size. NNR's task is to advocate and work to achieve more effective and less costly regulations and a reduction in the extent to which companies are required to report information in Sweden and the EU. NNR coordinates the business sector's review of impact assessments of proposals for new or amended regulations as well as the business sector's regulatory improvement work at national and EU level. This focused area of activity makes NNR unique among business organisations in Europe. More information on NNR is available at www.nnr.se.