



# **NNR's agenda for the EU's work on Better Regulation 2019–2024**

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**NNR**

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



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

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# NNR's agenda for the EU's work on Better Regulation 2019–2024

## 1. Introduction and background

A heavy regulatory burden due to inefficient and complicated rules affect businesses' productivity and competitiveness. Data also show that overregulation is considered by businesses to be one of the greatest impediments to growth.<sup>1</sup> Globalisation and digitisation have made the design and application of various regulatory frameworks more significant, as more or less all businesses meet increasing global competition.<sup>2</sup> A recent follow-up by the Swedish Agency for Economic and Regional Growth<sup>3</sup> and the results of NNR's 2018 survey of businesses' perceived regulatory burden<sup>4</sup> both show that the regulatory burden, both actual and perceived, has increased for Swedish businesses in recent years. It has also been shown that regulatory divergence causes an increase in material costs, which hampers economic growth, for example within the financial sector.<sup>5</sup>

Despite certain initiatives by the European Commission, NNR and its members feel that the regulatory burden due to EU regulation remains high. Previous surveys performed in Sweden regarding businesses' administrative costs due to regulation show that approximately fifty 50 percent of these costs derive from EU regulations. Consequently, work on better regulation at the EU level has had an immediate effect in Sweden and other Member States and on Swedish businesses. More work is therefore required by the EU to alleviate the regulatory burden on businesses and to ensure that EU regulations are fit for purpose and that associated business costs are kept to a minimum.

It is important that the efforts to improve regulation remain high on the EU's agenda and continue to be pursued and developed by the next European Commission. There have been certain developments, but progress is still insufficient, which is reflected in the fact that better regulation is still in high demand among businesses. This means that current principles and tools for better regulation at the EU level must be applied in practice by all EU institutions, not only by the European Commission, if results are to be achieved. The EU's supervisory authorities must also apply these principles.

In this document, the Board of Swedish Industry and Commerce for Better Regulation (NNR) presents its views on the EU's better regulation efforts and a number of proposals on how these may be improved further. NNR has actively participated in the preparation of the business organisation BusinessEurope's position papers<sup>6</sup> on better regulation at the EU level. Several of the proposals presented below are therefore consistent with BusinessEurope's recommendations.

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1 <https://www.pwc.com/gx/en/ceo-survey/2018/pwc-ceo-survey-report-2018.pdf>

2 <http://nnr.se/wp-content/uploads/A-new-term-of-office-brings-new-opportunities.pdf>

3 <https://tillvaxtverket.se/download/18.540d9f9a169d8c0b57adfae1/1555327373038/Delrapport%20Regelkostnader%202018.pdf>

4 <http://nnr.se/wp-content/uploads/nnrs-skop-undersokning-2019-med-svenska-foretagare.pdf>

5 <http://biac.org/wp-content/uploads/2018/07/Business-at-OECD-IFAC-Costs-of-Regulatory-Divergence4.pdf>

6 <https://www.businesseurope.eu/publications?policy%5B%5D=280&category%5B%5D=58>

## 2. The EU's work on Better Regulation

The European Commission shall prepare impact assessments for important legislation and underlying regulations. The first step is usually a description of what is to be prepared, in the form of a roadmap. Roadmaps are also prepared when evaluations of existing legislation are planned. If it is considered in advance that the impact will be major, an initial impact assessment is prepared instead, describing the proposal and possible solutions. The European Commission's Regulatory Scrutiny Board (RSB) is the body that examines the quality of the European Commission's impact assessments, evaluations and fitness checks.

An Interinstitutional Agreement (IIA) on Better Law-Making<sup>7</sup> has been agreed by the European Commission, the European Parliament and the European Council regarding better regulation. According to the agreement, the Council and the Parliament shall also make impact assessments of substantial amendments to the original proposal.

During the regulatory process, the European Commission shall consult affected stakeholders. Guidelines and tools have been prepared for such consultations. In addition to offering an opportunity to submit comments on early draft proposals, the European Commission will conduct public consultations. There is also an opportunity to submit comments after a regulatory proposal has been adopted and forwarded to the Parliament and the Council.

The opportunities for consultation are described in more detail on the European Commission website 'Contribute to law-making', which also contains a link to the website 'Lighten the load', which the European Commission created to collect suggestions for better regulation from citizens and businesses. To obtain advice and recommendations on better regulation and collect suggestions on better regulation, the European Commission has established an advisory group, the REFIT Platform, consisting of a stakeholder group and a group for Member States.

The EU evaluation system is made up of systematic evaluations of individual rules combined with more extensive fitness checks of several related laws or policies. Legislative proposals often contain a clause regarding the monitoring of the regulatory framework. In its guidelines on better regulation, the European Commission also refers to the 'evaluate first' principle – evaluations should be conducted before new regulations are proposed.

In 2015 the European Commission presented its Better Regulation package. Additional adjustments were also made in 2017. In 2018 the European Commission took stock of its work on better regulation, and the findings were presented in a report in spring 2019.

In 2017, as a result of the European Commission's survey regarding the possibility of adopting targets to reduce the regulatory burden in specific sectors, it announced that it will present information on the reduction of costs and benefits more uniformly in its evaluations and impact assessments. It will also increase its efforts to quantify such effects and, wherever possible, include a target for reducing the regulatory burden in every proposal to amend legislation.

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7 [https://eur-lex.europa.eu/legal-content/en/TXT/PDF/?uri=CELEX:32016Q0512\(01\)&from=en](https://eur-lex.europa.eu/legal-content/en/TXT/PDF/?uri=CELEX:32016Q0512(01)&from=en)

The European Parliamentary Research Service (EPRS) has an impact assessment unit that appraises the European Commission's impact assessments. It also offers to undertake impact assessments of substantial amendments to European Commission proposals if requested by European Parliament committees.

### **3. Targets for reducing the regulatory burden of businesses**

A reduction in the regulatory burden of businesses is important to increase productivity and competitiveness. Targets for reducing the regulatory costs in specific sectors constitute important incentives to bring about change and to ensure that the simplification measures that have been introduced actually lead to reduced costs. It is important that the work on better regulation does not cease once the targets and the work measuring them are finalised, but that there is a long-term overarching requirement on effectiveness and efficiency and that there are processes in place to ensure that the requirement for effectiveness and efficiency is met.

#### ***Recommendations***

**1. Set specific reduction targets and partial targets in areas considered to be of the utmost importance to the business community.**

Targets must also be monitored in a manner that is significantly more consistent and efficient than today.

**2. Limit the introduction of new regulations and keep this to a minimum.**

When new EU regulations are discussed, it is particularly important to question thoroughly whether regulation is strictly necessary or if there are alternative means to achieve the objective at a lower cost.

**3. Ensure that the overarching requirement on effectiveness and efficiency is complied with and met.**

Make an annual net summary of the total costs versus the total benefits of regulation. To achieve more efficient and less costly regulation, the benefits of the regulation must be weighed against the associated costs, which should also be used to guide the work on better regulation and reduce regulatory costs. For this to be possible, proposed regulation must, to a greater extent, be subject to cost and benefit calculations. It must also be clarified how costs and benefits were calculated.

**4. The 'once-only' principle should always be applied whenever possible, and any double regulation should be identified, avoided or removed.**

The 'once-only' principle means that the same information should be obtained once only.

## 4. Consultation and transparency

### Consultation

Consultation with the business community should take place at an early stage and during the entire law-making process in the EU. NNR supports the Organisation for Economic Co-operation and Development's (OECD) recommendation that stakeholder consultations should begin at a sufficiently early stage in the policy development process to also be used as an aid in defining the problem and the goals of the proposed regulation.

### *Recommendations*

**5. Base the documentation supporting decision-making on all available facts, including the views of stakeholders.**

Consultation is an important tool to obtain input on the impact of a proposal. It should be clarified that one objective of the consultation process is to identify additional policy alternatives that may not have been obvious to the decision-makers.<sup>8</sup> Consultations should be held in a transparent and open manner. The European Commission and other institutions must continue developing how to hold consultations with various stakeholders and how to use their feedback. At the same time, the European Commission must ensure that its consultation guidelines are used consistently and accurately.

**6. Improve the design of the questionnaires used for consultations.**

The design of the consultations should support the collection of facts for impact assessments. The consultation questionnaires should not be too long, but they should allow open-ended answers and comments. Leading questions should be avoided and consultation questionnaires should be offered in an editable format. The questions should be simple and clear, and it should always be possible to upload position papers in connection with the questions. It should also be possible to respond to every question in a questionnaire, regardless of which stakeholder group the respondent belongs to.

**7. Allow sufficient time for consultations and do not hold consultations during holiday periods.**

**8. Expand the mandate of the RSB to include examining how consultations have been held and how they have been addressed in the impact assessments.**

### Transparency

Transparency is a prerequisite for insight, participation and influence, and it is therefore important as an element in ensuring a democratic EU and to achieve regulation that is fit for purpose and cost-effective.

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8 OECD (2019), *Better Regulation Practices across the European Union* (page 51).

## ***Recommendations***

### **9. Increase stakeholder insight and participation in the work of the European supervisory authorities on preparing standards, guidelines, etc.**

Transparency is required in all aspects of the EU legislative process, but it must be reinforced with regard to the work carried out by the European supervisory authorities, such as in the financial area. Today, there are limited opportunities to participate in the EU authorities' reference groups. As this work is subject to confidentiality, and as confidentiality also applies to participating industry representatives, it is not possible for businesses or trade associations that are not representatives to find out what is being discussed and to comment on it.

### **10. Increased transparency of trilogues.**

Transparency of trilogues – negotiations between the European Commission, the European Parliament and the European Council – must be improved, as it is currently very limited. For example, dates and agendas of trilogue meetings and negotiation positions that have been established for individual negotiation rounds should be made available to the public in an easily accessible manner. Here we refer to BusinessEurope's position paper on the transparency of trilogues.<sup>9</sup>

## **5. Impact assessments and scrutiny**

### **Impact assessments**

Decisions on regulation must be evidence-based. High-quality impact assessments give regulators sufficient supporting documentation to determine whether a proposal achieves its purpose in a cost-efficient manner.

### ***Recommendations***

### **11. Carry out impact assessments on proposed legal acts as well as on implementing or delegated acts of major importance.**

Improvements are necessary, both to ensure that impact assessments are actually carried out on all important EU proposals, but also to ensure that relatively late amendments to the European Commission's proposals are analysed.

### **12. The Council and the Parliament must perform impact assessments when proposing substantial amendments.**

A greater practical undertaking from the Council and the Parliament is necessary to ensure that impact assessments are carried out on any substantial amendments to the original proposal by the European Commission. What is to be considered a 'substantial amendment' must also be defined. When a regulatory proposal has been adopted by the Parliament and the Council, it should be accompanied by an evidence-based impact assessment, so that the effects are known before the decision is made.

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<sup>9</sup> <https://www.besuisseurope.eu/publications/transparency-trilogues-besuisseurope-strategy-paper>



### **13. Highlight any discrepancies in impacts and conditions between different Member States.**

Rules and regulations should not lead to a disadvantage for a specific Member State. To encourage transparent implementation, impact assessments should, to a greater extent and whenever possible, account for such differences.

## **Scrutiny by the RSB**

To increase the quality of impact assessments, in 2016 the European Commission established a new body for regulatory scrutiny, which replaced the former Impact Assessment Board. The new body was given more independence and a stronger mandate. The Board's scrutiny is important to strengthen and ensure the high quality of the European Commission's impact assessments.

### **Recommendations**

#### **14. Give the RSB a stronger mandate and increase its independence.**

The RSB's mandate should be expanded to also include situations where no impact assessment has been carried out. From 2015–2018, just over 8 percent of proposals were not subject to an impact assessment.<sup>10</sup> To allow the RSB to examine and give an opinion on the conformity between the impact assessment and the proposal, the RSB should be given the opportunity to view the draft legislative proposal during its scrutiny. The RSB's opinions and the impact assessments referred to should also be published directly upon adoption. As this entails an expansion of the scope of the work, as well as additional work, it must also be guaranteed that the RSB has sufficient resources to perform its work. To reduce the risk of political influence, it should be considered how the RSB can be made increasingly independent. For example, the number of external members/experts without links to the European Commission could be increased.

#### **15. Publish draft impact assessments on the RSB's website.**

To afford stakeholders the opportunity to submit feedback on impact assessments and their different parts at a stage when adjustments can still be made, the draft impact assessments should be published before the final regulatory draft is adopted by the European Commission (NNR suggests that this is done on the RSB website).

## **6. The EU's process for improving and simplifying existing regulations**

### **Evaluation and follow-up**

The European Commission's principle 'evaluate first' is good. However, according to the RSB's 2018 annual report, the principle is not respected in approximately a fifth of all cases.<sup>11</sup> The RSB also found that a third of all evaluations supporting impact assessments were of inadequate quality or coverage. Hence, improvements are needed in this respect.

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<sup>10</sup> [https://ec.europa.eu/info/sites/info/files/better-regulation-taking-stock\\_en\\_0.pdf](https://ec.europa.eu/info/sites/info/files/better-regulation-taking-stock_en_0.pdf)

<sup>11</sup> [https://ec.europa.eu/info/sites/info/files/rsb\\_report\\_2018\\_en.pdf](https://ec.europa.eu/info/sites/info/files/rsb_report_2018_en.pdf) (page 40).

The European Commission performs evaluations of individual rules within the ambit of its regulatory fitness and performance (REFIT) agenda and more extensive fitness checks in certain policy areas. The REFIT Platform also allows discussions and advice on proposals aimed at improving existing EU legislation.

It is positive that there is a system for evaluation, but the work on evaluations must keep improving. In addition to the scrutiny of impact assessments, since 2016 the RSB has also been tasked with examining and giving opinions on the quality of the European Commission's major evaluations of individual actions and fitness checks. The RSB finds that there is major room for improvement regarding the European Commission's evaluations. NNR is of the same view regarding these shortcomings and requests measures to improve these aspects.

### **Recommendations**

#### **16. Improve the design and methodology of the evaluations.**

According to the RSB, the main issues include the design and methodology of the evaluations, and these issues affect the ability to make a 'proper' evaluation of an action's effectiveness and efficiency.

#### **17. Highlight evaluation-related issues that are already in the impact assessment and use evaluations as a starting point when defining problems.**

In its annual report, the RSB mentions that issues related to future evaluations must already be highlighted in the impact analysis. According to the European Court of Auditors, in its report on ex-post reviews of EU legislation<sup>12</sup>, evaluations are not always used by the European Commission in its impact assessments.

#### **18. The European Commission must take greater responsibility to ensure that evaluations are carried out in a transparent and independent manner.**

Most importantly, any weaknesses in the facts presented and the conclusions based upon them must be reported in a transparent manner. With regard to roadmaps for fitness checks, the choice of legislation to be included must be better explained and also be justified. The roadmap should also clearly state the different consultation channels envisaged, especially with regard to any studies prepared by external consultants on behalf of the European Commission. In its annual report, the RSB also addresses the issue of insufficient transparency regarding weaknesses in the facts presented and the conclusions drawn. The RSB also notes that European Commission services have limited incentives to make high-quality evaluations with a frank assessment of the merits and weaknesses of an initiative.

### **Review clauses**

Review clauses play an important role in ensuring that legislation remains fit for purpose, effective and efficient after a certain period of time.

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12 [https://www.eca.europa.eu/Lists/ECADocuments/SR18\\_16/SR\\_BETTER\\_REGULATION\\_EN.pdf](https://www.eca.europa.eu/Lists/ECADocuments/SR18_16/SR_BETTER_REGULATION_EN.pdf)

In the Interinstitutional Agreement between the Parliament, the Council and the European Commission on better law-making<sup>13</sup>, it is stated that the three institutions agree to systematically consider the use of review clauses in legislation.

### ***Recommendations***

#### **19. Develop the review clauses provided at the end of legislative proposals to ensure greater consistency.**

The wording of review clauses must generally be adapted based on the regulatory framework in question, but greater consistency could be achieved with regard to the use of definitions, methods, etc.

### **Future-proof rules and regulations**

#### ***Recommendations***

#### **20. Develop EU rules and regulations that are flexible and neutral in their design and ensure that both new and existing EU rules and regulations have sufficient scope for technical innovations and new business models.**

### **The REFIT Platform**

#### **21. The next European Commission should continue its work on the REFIT Platform and turn it into a permanent forum to support improvements to existing EU rules and regulations.**

#### **Develop the working arrangements for the REFIT Platform further.**

As the REFIT Platform remains relatively unknown, additional communications are needed to make it known to the general public. The person or organisation submitting a suggestion should be given the opportunity to present the submission to the REFIT Platform, either in person or via digital means, as this may further clarify the issue at stake. Following up on the opinions issued by the REFIT Platform is a very important issue. NNR therefore proposes that the person or organisation submitting a suggestion to the REFIT Platform (most importantly, those who submit several suggestions) should also be given the opportunity to attend a feedback meeting with relevant European Commission officials to hear how the proposal and the REFIT Platform's recommendations regarding the proposal were received. In addition to the above, the written and public reporting by the European Commission regarding its handling of the proposals submitted to the REFIT Platform, as well as the effect and concrete outcomes of the REFIT Platform's opinions on the European Commission's work and proposals, must be clearer and more precise.

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13 <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32016Q0512%2801%29>



## **Realistic implementation periods**

Realistic implementation periods are a key factor to achieve an effective and efficient implementation with legal certainty. Implementation periods that are too short cause onerous and high costs for the affected businesses. This issue may be particularly problematic in the financial area, where overarching requirements and the time of entry into force is specified in the framework legislation, while items such as technical details are determined later at various underlying institutional levels.

### ***Recommendations***

- 22. Set realistic implementation periods, not least when the regulatory process involves different institutional levels.**

## **7. Over-implementation and the EU's role**

An issue brought up by NNR's members and the business community at large is over-implementation (often referred to as gold-plating). This is because over-implementation may cause significant costs and impediments to growth and business in the internal market. It also makes it difficult for businesses to find out how rules and regulations are implemented and applied in each Member State. When considering new or amended common EU rules and regulations, the Member States and the European Commission should jointly ensure that they are fit for purpose, cost-effective and can be transposed to national legislation in a cost-effective manner that supports the internal market. EU Directives should also be implemented in a manner that does not fragment the internal market, prevent competitiveness or give rise to unnecessary costs or burdens. It must also be ensured that the application of EU Regulations is consistent, effective and efficient.

Member States have a right to determine how an EU Directive should be implemented in the individual Member State, which in turn requires Member States to be transparent when doing so. NNR's report on gold-plating<sup>14</sup> emphasises the need for transparency in the form of a publicly available description of any gold-plating, containing both a description of the gold-plating (in relation to the minimum level in the EU Directive), a justification for why it is deemed necessary and a description of its impact on society, including the business community.

### ***Recommendations***

- 23. Highlight over-implementation and report the impact.**

The European Commission should develop clear guidance on the implementation of EU Directives in the Member States. This effort should be carried out in cooperation with the business community. Based on this, Member States should be required to report to the European Commission regarding the implementation, including any over-implementation, in a publicly available manner (such as via the MNE interface). This is to highlight whether a Member State's implementation of an EU Directive may cause

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14 [http://nnr.se/wp-content/uploads/Clarifying\\_gold\\_plating\\_november\\_2012.pdf](http://nnr.se/wp-content/uploads/Clarifying_gold_plating_november_2012.pdf)

fragmentation of the internal market, resulting in, for example, anti-competitive effects and unnecessary costs for companies. In this respect, the REFIT Platform adopted a recommendation on transparent transposition on 14 March 2019.<sup>15</sup>

#### **24. Provide clear criteria for over-implementation.**

The European Commission's guidelines (and reporting) should define different criteria for when the minimum level of the Directive is exceeded. This should include:

- Adding regulatory requirements beyond what is required by the Directive.
- Extending the scope of the Directive.
- Not taking (full) advantage of any derogations when this may cause barriers in the internal market.
- Retaining national regulatory requirements that are more comprehensive than is required by the Directive in question.
- Implementing the requirements of the Directive earlier than the date specified in the Directive.
- Applying stricter sanctions or other enforcement mechanisms than are necessary to implement the legislation correctly.

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15 [https://ec.europa.eu/info/files/refit-platform-recommendations-horizontal-issues-xxii9a-transparent-transposition\\_en](https://ec.europa.eu/info/files/refit-platform-recommendations-horizontal-issues-xxii9a-transparent-transposition_en)

## 8. Relevant documents and references

The documents listed below, with associated links, describe the work on better regulation and contain reviews and recommendations that have been provided by various institutions and stakeholders.

Interinstitutional Agreement on Better Law-Making, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32016Q0512%2801%29>

The European Commission's Better Regulation website, [https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how\\_en](https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how_en)

The RSB's 2018 annual report, [https://ec.europa.eu/info/publications/regulatory-scrutiny-board-annual-report-2018\\_en](https://ec.europa.eu/info/publications/regulatory-scrutiny-board-annual-report-2018_en)

The OECD's report *Better Regulation Practices across the European Union*, <http://www.oecd.org/publications/better-regulation-practices-across-the-european-union-9789264311732-en.htm>

BusinessEurope's position papers on Better Regulation, <https://www.buress.europa.eu/publications?policy%5B%5D=280&category%5B%5D=58>

Study by Business at OECD and the IFAC on *Regulatory Divergence: Costs, risks, impacts*, [http://biac.org/wp-content/uploads/2018/04/IFAC-OECD\\_Regulatory-Divergence\\_V9\\_singles.pdf](http://biac.org/wp-content/uploads/2018/04/IFAC-OECD_Regulatory-Divergence_V9_singles.pdf)

REFIT Platform recommendations on stakeholder consultations, [https://ec.europa.eu/info/files/refit-platform-recommendations-horizontal-xxii4a-b-stakeholder-consultation-mechanisms\\_en](https://ec.europa.eu/info/files/refit-platform-recommendations-horizontal-xxii4a-b-stakeholder-consultation-mechanisms_en)

REFIT Platform statement on transparent transposition, [https://ec.europa.eu/info/files/refit-platform-recommendations-horizontal-issues-xxii9a-transparent-transposition\\_en](https://ec.europa.eu/info/files/refit-platform-recommendations-horizontal-issues-xxii9a-transparent-transposition_en)

PwC's 21st CEO Survey – *The Anxious Optimist in the Corner Office*, <https://www.pwc.com/gx/en/ceo-survey/2018/pwc-ceo-survey-report-2018.pdf>

Report by the Swedish Agency for Economic and Regional Growth, *Regler som påverkar företagens kostnader och konkurrenskraft 2018* (in Swedish only) <https://tillvaxtverket.se/download/18.540d9f9a169d8c0b57adfae1/1555327373038/Delrapport%20Regelkostnader%202018.pdf>

### NNR's reports

A new term of office brings new opportunities, <http://nnr.se/wp-content/uploads/A-new-term-of-office-brings-new-opportunities.pdf>

Clarifying Gold-Plating, [http://nnr.se/wp-content/uploads/Clarifying\\_gold\\_plating\\_november\\_2012.pdf](http://nnr.se/wp-content/uploads/Clarifying_gold_plating_november_2012.pdf)

NNR's 2019 SKOP Survey (in Swedish only), <http://nnr.se/wp-content/uploads/nnrs-skop-under-sokning-2019-med-svenska-foretagare.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 Swedish Food Federation (Livsmedelsföretagen)  
The Small Business Association (Småföretagarnas Riksförbund)  
The Stockholm Chamber of Commerce (Stockholms Handelskammare)  
Swedish Private Equity & Venture Capital Association, SVCA (SVCA)  
The Swedish Food Retailers Federation (Svensk Dagligvaruhandel)  
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 & Biofuels Institute (Svenska Petroleum och Biodrivmedel Institutet)  
The Confederation of Swedish Enterprise (Svenskt Näringsliv)  
The Swedish Construction Federation (Sveriges Byggindustrier)  
The Association of Swedish Engineering Industries (Teknikföretagen)  
The Swedish Confederation of Transport Enterprises (Transportföretagen)  
Visita – The Swedish Hospitality 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 21 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](http://www.nnr.se).