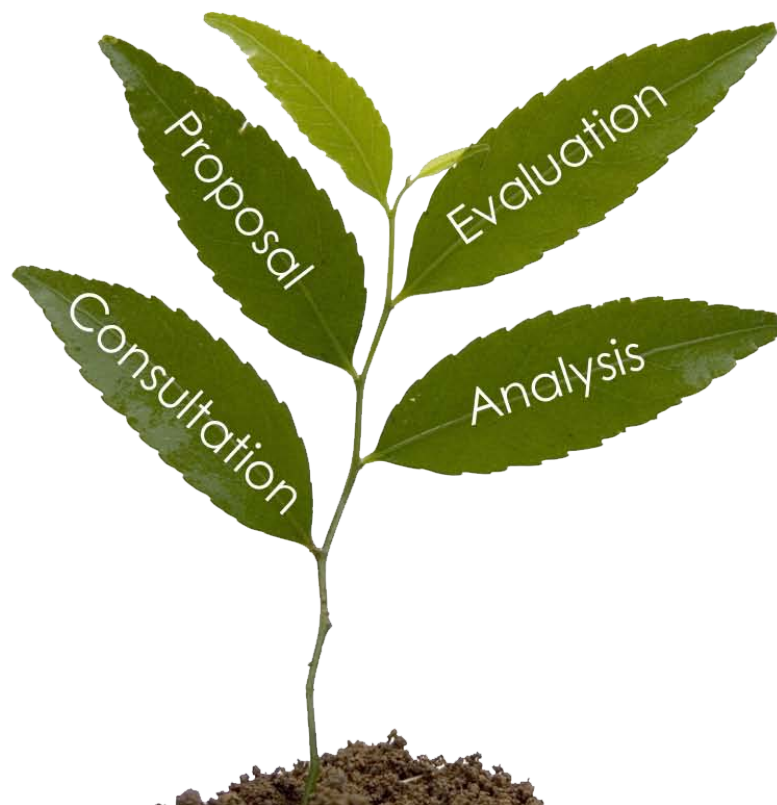


## The Swedish agenda for rules and regulations 2010

Changes in rules and regulations – a necessity for more  
growing companies 2011-2014

December 2010





# Summary

The need for regulatory reform recurs again and again in surveys where business owners are asked about the barriers they see to the expansion of their business. The governments in power during the last two parliaments chose to try to meet the requests from businesses primarily by focusing on what are known as administrative burdens.

During the last two parliaments, many important steps have been taken to make rules and regulations more cost-effective. Examples of this are the introduction of a uniform impact assessment model and the establishment of the Better Regulation Council. Furthermore, the government has measured administrative burdens and implemented a large number of measures to reduce these burdens. A reduction of 3.4 per cent has been achieved according to the wording of the regulations in January 2010. NNR's findings are that there is still a need for a change of approach regarding how different inquiries, the government and state agencies present proposals for new and amended rules and regulations. There is also room for improvement as regards how the public administration organises and carries out its work of reforming different regulatory systems for businesses within the framework of the government's stated ambitions for simplification.

We based this report on a survey called the "Regulation Barometer 2010" in which about 600 business owners answered a number of questions relating to regulation. The questions concern everything from local regulatory supervision and burdensome reporting requirements to issues relating to the regulatory system inhibiting business growth. This survey, and NNR's follow-up of businesses' total costs of regulation from last spring, enables us to conclude that 73 per cent of businesses have not noticed any significant difference or any reduction in regulatory costs. It is probably difficult to pick out any single explanation for this; rather the answer must be sought on a wider basis. For instance, the wrong types of problems may have been tackled, there may be a delay before proposed EU directives come into force, or businesses responding to the survey may not have come into contact with the regulatory system since it was reformed. The reason may also be that the proposals have not gone far enough for business to have noticed any actual difference.

Like earlier surveys, the Regulation Barometer 2010 shows that other types of measures are needed to address the issues that businesses see a need to change and improve. With this in mind, NNR makes the following proposals for action to be taken:

- The changes that are made to the existing regulatory system must be those demanded by businesses in Sweden.
- When considering new or changed regulations, choose the option that involves the lowest costs for the concerned businesses.
- A broader systematic discussion of regulations and the effects.
- Evaluate ex post what effects different regulations have had.
- Undertake and publish national impact assessments (IAs) of different EU proposals that are to be negotiated within the European Union.

There is a real need for many specific measures to be taken in different regulatory areas. Along with the publication of this report, NNR's members are going to present a large number of proposals for measures concerning different regulations and different types of regulatory effects. At the same time, NNR would like to stress the importance of strong political steering and affirmation for the process to succeed. Politicians with responsibilities in this area must work with public administration officials in a more integrated way to produce the specific measures demanded by businesses.

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# 1 Introduction

## 1.1 Background

In the last decade, political debate in Sweden has increasingly focused on the issue of whether to simplify and reform different parts of the regulations. The real breakthrough came in 2002<sup>1</sup> when the non-socialist parties agreed, with the support of the Green Party, to implement more far-reaching measures than the government in power at the time wanted to implement. Several system measures were implemented in the previous parliament such as the establishment of a Better Regulation Council, completing the assessment of administrative burdens and the adoption of new IA requirements. As regards the government's work with specific measures, according to the latest official communications they have presented a large number of specific proposals, 1150<sup>2</sup> to be precise, which are measures that have either already been introduced or are going to be implemented.

Several surveys have been conducted with businesses regarding their opinions and experiences of the government's work.<sup>3</sup> A common denominator from these surveys seems to be that businesses have not noticed much of a difference compared with the past, which raises a number of issues. There are probably several different reasons that businesses reply as they do in these surveys. The results can probably be explained by the fact that the measures are of marginal significance, are taken in the wrong areas and do not go far enough, and that it is difficult to collect experiences of these details by means of survey questions.

Bearing in mind that, according to these surveys, businesses have not noticed any great difference, NNR suggests that it is essential in this report to discuss and analyse the effectiveness of the different parts with which the government has worked. To be successful, the process must get at the problems that businesses raise. As regards measures taken, the report covers our view of the following overall issues:

- What has worked well and what has not worked?
- What needs to be done so that businesses will notice a difference?

Starting from this review of different implemented measures and by giving our point of view, we want to create a platform for discussion concerning future trends.

In order to address these overall issues we primarily use our own knowledge and experience and collect empirical data from our own and other similar surveys of businesses that have been carried out.

## 1.2 Layout of the report

In chapter two, we discuss what worked well and what worked less well in the government's simplification programme during the last parliament. Chapter three covers the result of the latest survey of 600 business owners that NNR carried out in October 2010. The analysis presented in chapter two and the results of the survey in chapter three are the basis for chapter four where we present a number of system proposals concerning action for the future.

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1 See Bet 2002/03NU1, expl. note 2002/03:74

2 Expl. note 2009/2010:226

3 See NNRs Regelbarometer 2009 (NNR's Regulatory Barometer 2009) and Företagarna's (Swedish Federation of Business Owners) survey of top irritations

## 2. Action taken and experiences

### 2.1 Basis of report

Bearing in mind that several system-wide measures have been taken, which in many cases need considerable time to work, it is not totally straightforward in the limited time period to establish whether anything has been achieved and, if so, what. NNR does, however, make an attempt at presenting the experiences we have collected as regards the central measures implemented.

Apart from the system itself, the process must be combined with a strong political will and firm control of the reform process if it is to be able to deliver specific proposals. The “regulatory simplification process” is a tool that must deliver specific results. It is only then that the measure will be successful.

Today regulatory simplification at an overall level is quite an uncontroversial political issue where problems first become obvious when it comes to the detail. This emerged clearly from NNR’s review of the different parties’ view of the issue which we covered before this year’s elections<sup>4</sup>. In this perspective, politicians can often be heard stressing the importance of removing cumbersome and costly regulations. It then turns out that in many cases it is not possible to change the current regulations for various reasons, such as the political, future conflicting objectives, etc.

A short description and assessment are given below of what works well and what works less well with regard to the different measures that the government took during the last parliament and where different parts in many cases fit together and overlap. Our presentation below inevitably involves a degree of overlap. It should be noted that in several cases the measures had already been begun by the previous government, but have now been completed, refined or otherwise amended.

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4 The summary is available at [www.nnr.se](http://www.nnr.se)

## 2.2 Impact assessments (IAs) and Better Regulation Council

The requirement for an impact assessment (IA) to accompany a proposal for new or amended regulations has existed for several decades and is anchored in a variety of different legal documents. The idea is that decision-makers and politicians should receive an advanced assessment of what effects the new or amended regulations can be expected to have.

In order to strengthen the institutional requirements to produce high quality IAs, the government has set up a Better Regulation Council that has been in place since the autumn of 2008<sup>5</sup>. The Council's job is to review whether the policymaker has shown that the proposal presented is the proposal that is expected to involve the least possible administrative cost to achieve the objective of the regulation. The Council also has the task of looking at the proposal's other impacts, but without the same explicit commission.

In the context of the discussions concerning a new administrative ordinance (SOU 2004:23), NNR launched a proposal that a "stop mechanism" should be introduced. The mandate was to have been far-reaching and involved being able to stop the issue of various regulatory proposals if the IA was judged to be of inadequate quality. NNR's proposal can be said to have been the starting signal for discussions about the importance of bringing about an independent review of the quality of IAs. NNR's requirement for a stop mechanism was judged to be too difficult to reconcile with the Swedish constitution. After several years' discussions and preparation within the Swedish Government Offices, the proposal finally became a Better Regulation Council with an advisory function.

NNR views it as very positive that the Better Regulation Council is in place and has had its mandate extended. At the same time, it must be stressed that its work can be no better than the mandate within which it has room to operate. State agencies and departments today need not take into consideration the views expressed by the Better Regulation Council. Its views are seen to be a recommendation to be taken into account to the same degree as other views in the decision-making process. Bearing in mind that it is complex to follow up the effects of its observations in different matters and compare different proposals based on forecast as against actual results of the Council's observations, it is also difficult to establish the actual effects of the Council's work within the limited time it has had to operate and express views. The Council probably needs to do its work for a longer period of time before the effects of its work can be evaluated.

*- Review the Better Regulation Council's role and mandate*

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5 See Kommittédirektiv (Committee Directive) 2008:57



The Council has a limited mandate relating to certain effects of the regulatory process in terms of the requirement for administrative burdens. For the companies concerned, it is equally necessary that other types of regulatory requirements be reduced to a minimum. This is brought out in the same way in different proposals. The ambition from the public administration side must always be to try to minimise all types of costs that can result from the different regulatory requirements. NNR takes it as given that it should oversee the Better Regulation Council's mandate with the aim that its role should be more comprehensive from a business perspective.

The adoption of a new IA ordinance<sup>6</sup> should be seen as a very important step towards higher quality and greater transparency in that it strengthens the requirement for what is to be presented and makes the same demands on all who present regulatory proposals.

A fundamental problem with IAs is that they are used as a form of documentation analysis rather than as a tool to produce a balanced final settlement between the various affected interests. In most cases, the analysis is done as a last step in the regulatory process in which the original proposal itself is hardly ever reviewed against the results of the IA. There is seldom any discussion concerning whether the chosen option is the best option considering the different interests involved and what costs are likely to result from different choices. The NNR's earlier Regulation Indicator, as it was known, shows that many of the indicators we monitored over a period of time displayed improvements; see the table below

	2002	2003	2005	2006	2007	2008	2009
Are the different options described?	26	37	53	47	30	46	44
Is the number of businesses given?	6	9	28	26	40	54	51
Previous regulations	55	56	86	75	54	68	74
What is the effect of the proposal on administrative costs?							
a. increased			58	53	63	46	46
b. reduced			16	20	12	36	28
c. unchanged			32	27	25	18	9
Are the total costs for the business accounted for?	4	5	9	8	17	16	13
Is there a report on how the competitive climate is affected?	9	20	47	39	35	37	20
EU-based			44	44	51	41	40
Gold-plating – does the proposal go further than the EU directive, introducing special Swedish requirements?			7	4	32	13	8

6 Ordinance 2007:1244 on impact assessment of regulations.

Essential issues regarding the description of costs and alternative solutions are still addressed in only a few cases and poorly done, which can probably be explained by the fact that these are the most complex issues. We mean by this that a partial explanation might be that in Sweden, what should be done is well documented, but not how. After all, in many cases it is complex to assess in advance the possible effects of the consequences of a presented proposal. In this perspective, to raise the quality of the assessments we find it appropriate for the public administration to engage external help from researchers, consultants, etc.

Another problem is that the shared responsibility in the Swedish regulatory process fails to give an overall description of the expected impacts before a decision is taken to adopt the law. A very specific example is the requirement for cash registers where the law was adopted long before the tax authorities published their regulations which determine the final requirements. In this way, members of the Swedish parliament never receive information about what the different proposals might entail in terms of costs, which ought to be an essential aspect to consider before, and not after, the decision itself is taken. Members of the Swedish parliament should actually demand to a greater extent more comprehensive, higher quality assessments. There is also an issue around the degree and form of authorisation that different laws extend to different state agencies and a lack of feedback to Swedish parliament about the effects.

A further problem is that as far as Sweden is concerned, no national IAs are done with regard to the different proposals that are presented at a European level and being negotiated. The EU Commission's analyses are mostly drawn up at an overall level that does not explain how individual member countries are affected by the proposal. There is a need for the introduction of a requirement for national analyses, which would probably also strengthen the Swedish negotiating position in various matters. Evaluations of different proposals are made in advance in certain areas, but they are not always reported publicly and the contents differ considerably. In the United Kingdom, for example, this type of analysis is done in a more systematic way and the results are reported openly.

It is apparent from the above that NNR concludes that progress has been made, but there is reason to look at how the IA instrument can be improved further according to the measures we highlight above.

*- Engage external help to raise the quality of the IAs*

*- Strong requirement to report options together with their related cost calculations*

*- Members of the Riksdag (Swedish parliament) should demand higher quality IAs*

*- Carry out national IAs of EU proposals*

## 2.3 Rolling action programme and specific measures

During the previous parliament, the government chose to work with a rolling action programme to present, on an ongoing basis, the measures it was planning to take to reduce administrative burdens.

The government chose to apply the same requirements to all 44 state agencies and departments involved in the process. The requirements were expressed formally in the wording of the commission, i.e. the same demands were made of the Finance Department as on the Legal, Financial and Administrative Agency to submit proposals for action, although the two departments were responsible for substantially different shares of the total burden. It is open to question whether these general requirements of the whole of public administration negatively affected the credibility and realism of the process.

In addition, there are problems with control of the process along the lines of “shared responsibility is not an answer” in that the government only set an objective for the whole public administration as a collective. Between 2001 and 2004, the government chose to measure too few areas, but chose on the other hand to set different objectives for different areas, which is to be preferred when it comes to accountability and applying real pressure to the process.

Salaried employees have little reason to put forward proposals for substantial reforms that have little chance of getting political support. As a result, there is little pressure in the process to deliver robust measures when clear direction is lacking from the political side. NNR notes with regret that very few measures have actually produced any real reductions in administrative burdens. Many measures can be considered within the framework of the Administrative Procedure Act's service obligation. With that in mind, politicians should, to a greater extent, present guidelines and which areas they are willing to discuss in terms of measures to be taken, types of measures, etc., and those they do not wish to change. This can create a more credible, realistic process that is probably more effective than the one used in the previous parliament.

In most areas where there is consultation with commerce and industry on a regular basis, separate consultations were held by department and relevant authority. Shared responsibility gives nobody the opportunity to discuss the whole picture, which is what is essential from a business perspective of businesses. Only a few departments have invited the relevant agencies to joint consultations with commerce and industry, which must be judged to be a much more effective way of organising the work.

*- Include politicians with responsibility to a greater extent in the process so as to prioritise essential issues*

One advantage of the process is that it was possible to bring in new proposals, or develop proposals related to the process, on an ongoing basis. A further advantage of the process is that it created a platform for a recurring discussion between politicians and business organisations that had probably not existed in the same way before. It usually takes a long time for individual proposals to get a hearing and it tends to happen in stages; a sustained dialogue is central to improving the regulations. From this perspective, it is a positive development that a well-established platform exists.

We see a need to review practices so that more robust, concrete measures can be arrived at more quickly that can solve the different problems raised by business owners and trade and industry organisations. This may be done by way of greater use of working groups, focus groups, etc. manned with representatives from different departments, agencies and commerce and industry organisations to tackle a specific task or produce measures in a particular area.

*- Review practices in the process and for consultation in order to make them more effective than they have been*

## 2.4 Quantitative objectives and measurement of administrative burdens

The present government had as its objective that administrative burdens should be reduced by at least 25 per cent during the previous parliament. The result up to and including 2009 was a net reduction of 3.4 per cent<sup>7</sup>, if measures actually implemented are taken into account. The reform has required a comprehensive technical measuring exercise of 18 different areas of legislation to produce documentation and a total figure to be used as a basis, known as the “zero base”. The method is standardised, meaning that it can be applied to all areas of legislation that contain what are known as information obligations.

The methodology comes from the Netherlands, where it was used to measure administrative burdens in the mid-1990s. It is now used by most of the EU Member States. The introduction of this method was preceded by a debate in the Netherlands as to what politicians were willing to discuss and the compromise reached was administrative burdens. At that time there was no political acceptance for including the substance of legislation in the discussion on the grounds that it would call into question the substance of the legislation itself and, by extension, the political instruments of control as such. Nowadays, however, the Netherlands has extended the process to include the substance of legislation as well.

The method was first used in Sweden in 2002. It should not be underestimated how the discussion concerning administrative burdens in Sweden ramped up the discussion about the effects of regulations on the political agenda in a way that would probably not have been possible had the method not been implemented. A systematic discussion on certain aspects of the regulations is after all better than no discussion at all. The issue of what it is politically possible to gain acceptance for is a key consideration in the discussion of strategies for the future.

The advantage of these measurements is that it is possible to monitor developments over time, and thus pick up the effects of different measures and how the changes that occur influence results. By expressing and adopting a quantitative objective, politicians have forced themselves to come up with measures that impact on the results and where it is business owners who get to assess the results of the measures.

The process as such has thereby pushed the issue high up the agenda in a way that had not happened before in Sweden. There have, for example, been innumerable inquiries tasked with submitting proposals for measures to reduce administrative burdens. The importance of the fact that the objective was clear and quantifiable,

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<sup>7</sup> According to Tillväxtverket's report, Utveckling av administrativa kostnader 2006-2010 (The development of administrative costs 2006-2010).

and that developments can be monitored over time, should not be underestimated.

The disadvantage of this method is that administrative burdens are only one small portion of the costs that are expressed in the different requirements in legislation, as is clear from NNR's reports about different businesses' total regulatory costs<sup>8</sup>. The narrow definition may negatively affect the debate concerning the shape of the regulations inasmuch as the politicians focus excessively on measures that are relatively insignificant from a growth perspective. The whole process starts by separating away essential aspects for businesses and business owners which it would probably be much more important to change compared with reducing the administrative burden by a number of percentage points.

Another shortcoming is that the political system has not used the measurements to identify measures that have been estimated as being maximum costs from a measurement point of view. For the objectives to be attained, the measurements should be used as an orientation tool to identify areas and prioritise between possible measures. Rather, the measurements have been used to chase "every last penny", causing the discussion to focus excessively on figures as such instead of on what actual measures were needed and the issue of possible alternative solutions.

It is argued in this context that different measures have saved this or that many billions, which are absolute amounts that are calculated on a highly theoretical basis starting with the model's given constraints. However, savings that are estimated according to this method cannot ever be equated to actual savings that can be realised in a business context. A savings measure may produce savings according to the method but will not necessarily produce the corresponding real savings at a business level. Furthermore, individual regulations affect different businesses to different degrees. As with the use and interpretation of all numerical data, it is worth being aware of the constraints that have been applied and of the assumptions that have been made in producing it.

Attempts were initially made by the government during the previous parliament to identify indicators with a view to being able to monitor the second part of the government's objective – to make a noticeable difference in the day-to-day running of businesses. The Ministry of Enterprise, Energy and Communications gave what was then NUTEK the task of producing an indicator proposal. NNR and several other commerce and industry bodies raised strong objections to the proposal that was presented<sup>9</sup>. The government opted not to proceed with the proposal. NNR finds it commendable that the government had a broader approach in its reform and an objective

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8 The reports can be found at [www.nnr.se](http://www.nnr.se)

9 Nutek report no 040 2008

*- The reform must include more dimensions than just administrative burdens*

*- Reform must be monitored with tools other than just measurements of administrative burden*

that went beyond the issue of administrative burdens. If these types of more qualitative objectives are to be exploited in the future, however, it must be possible over time to monitor how the work is proceeding with some appropriate monitoring methodology that shows what direction the work is taking. NNR sees a need to monitor implemented measures in several ways. It is not sufficient to use only measurements of administrative burdens to monitor developments over time.



*-Extend and intensify the project to research the effects of regulations on businesses*

## 2.5 Limitations and orientation of reform

NNR's project on businesses' total regulatory costs shows that there are other aspects of regulation that need to be borne in mind in connection with discussions concerning how regulation actually affects businesses. The absolute figures for each business in our study are not the primary issue. Rather it is the relationship between different types of regulatory costs. By extension, our study clearly demonstrates the need for a wider discussion.<sup>10</sup>

During the last parliament, commerce and industry submitted a large number of proposals: 316 unique proposals, to be precise, concerning various areas and with varying degrees of specificity. In many cases, the proposals concern measures other than reducing the administrative burden, indicating a demand for a wider debate than the one to date and for other types of measures.

NNR considers it a positive result that the government introduced measures to include the local and regional dimension in its reform<sup>11</sup>. This has been done by way of commissions to the Tillväxtverket (Swedish Agency for Economic and Regional Growth) regarding local government efforts. The government initiated regional reform efforts by commissioning the county administrative board of Kronoberg in the spring of 2010 to start a project to review what the county administrative board could do, for example, to simplify exercising its local duties, to reduce turnaround times of procedures, extend services to businesses, etc., and how. The project should report on 17 December 2010 at the latest. NNR will be monitoring work that has started concerning the local and regional level.

In 2009 the government commissioned Tillväxtanalys (the Swedish Agency for Growth Analysis) to study the effects of regulation on businesses. Work will focus on what are known as indirect effects of regulation which, from the Swedish point of view, is an area lacking research. NNR has been pushing for the government to take this initiative for several years and welcomes that the issue of the effects of regulation is being examined from a wider perspective. Tillväxtanalys has acquired large parts of the project and the Ratio research institute will carry out most of the work. Tillväxtanalys will report its findings to the government by 31 December 2010 at the latest. A research abstract for the project was presented in the spring<sup>12</sup>. NNR sees a need for an extension because the research concerning this important area is unfortunately, from a Swedish point of view, of marginal significance. We also see a need to include the issue of financial regulatory costs in the work.

10 The reports on the total costs of regulation to businesses is available at [www.nnr.se](http://www.nnr.se)

11 Government decision 27/5/2010, Reg. no N2010/3641/MK

12 Regulatory burdens and economic development – a research abstract, Tillväxtanalys report no 2010:07



If regulatory simplification as a process is to reach essential measures from a growth perspective, the discussion cannot be limited in advance to the issue of administrative burdens. From a theoretical perspective, it can be argued that, all other things being equal, reduced transaction costs in the economy such as reduced administrative costs should create better conditions for growth. This probably presupposes that the perspective for measures is wider than today's definition of administrative burden and that substantial bottlenecks are dealt with. However, NNR is not aware of any empirical study that can show in actual terms a connection between the issue of reduced administrative burdens and growth.

On the other hand, international research has been done that highlights the fact that the form and content of institutions play an important role in the conditions for growth<sup>13</sup> and also as regards getting more Swedish businesses to grow<sup>14</sup>.

NNR finds that the connection between the form and content of the regulations is a complex area in terms of growth, especially if the issue is limited to administrative burdens. The hypothesis seems to be that by reducing the administrative burden, resources are freed up in businesses that can be used for other purposes where the resources' alternative value is seen to be higher. Probably very significant reductions are necessary in order to free up any resources in the individual businesses. Some researchers in the United Kingdom have called into question the work done by many countries inasmuch as it is considered to be based on a line of argument that is too simplistic<sup>15</sup> as regards what effects the reductions actually have for the national economy. NNR sees here the need for more research and in-depth analysis to produce a more scientifically based direction for future reform work.

In many cases, it can be called into question whether the problem is not already known. For decades, business owners and business organisations have been raising demands and highlighting the need to implement measures that they judge to be essential. For the future it is probably essential to prioritise a number of important measures in every area instead of, as during the last parliament, pursuing comprehensive reform that results in many more or less quite insignificant measures. The discussion ought instead to be based directly on businesses' actual needs.

*- Take businesses' needs as the starting point instead of limiting the discussion in advance to certain aspects of the regulations*

13 See, e.g. North, D. C (1990), *Institutions, Institutional Change, and Economic Performance*. Cambridge. Cambridge University Press

14 See Henrekson, Magnus och Johansson, Dan (2009). "Competencies and Institutions Fostering High-growth Firms." *Foundations and Trends in Entrepreneurship*, 5(1): 1-80.

15 Dieter Hielm, *Regulatory reform, capture, and regulatory burden*. Oxford review of economic policy vol 22 No 2 2006

*-The issue of how regulation affects conditions for growth must be taken into consideration when different measures for the future are discussed*

The government states in the budget proposals for 2011<sup>16</sup> that the overall objective will be “a noticeable change in the day-to-day running of businesses”. To achieve that, the measuring exercise concerning administrative burdens is to continue until 2012; new indicators may potentially be produced to monitor the work. NNR considers it to be unclear what might or might not be included in the concept of day-to-day running of businesses. We see here a clear need for the government to develop and clarify further what the work should comprise. Certain elements may only concern businesses relatively rarely, for instance, but may be of enormous significance for individual businesses when they come into contact with the regulations. A specific example of this is environmental testing. Accordingly, NNR considers that frequency cannot be a reason for any limitations, but rather the focus must be on what collective effects can be associated with different regulations.

NNR finds, as we reported earlier in this section, that initiatives have been taken to widen the discussions, which is positive. At the same time, we are of the view that there is good reason to consider further steps for continued work and to widen the focus of the process as such. The government’s official communication states that regulatory simplification is a process<sup>17</sup> primarily aimed at creating growth, which probably requires other types of measures than those taken during the last parliament.

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16 See section 3.7 pp.68-69 Expenditure 24

17 See p.7 Expl. Note to Reg. 2009/10:226.

## 2.6 OECD review

In 2010, the OECD carried out a follow-up exercise to its 2007 review of Sweden's work on regulatory simplification<sup>18</sup>. Like NNR, the OECD noted that several important measures had been taken. As regards the majority of the OECD's many recommendations, they are in many instances in line with the proposals we make in this report and made earlier in different contexts. It should be noted, however, that the OECD has more of a country perspective than an explicit business perspective in its reviews of different countries' work. Nonetheless, we find that there are several key recommendations worth highlighting in the OECD's review. For example, the OECD suggests that Sweden should take the following action:

- Responsibilities need to be clarified as regards the requirement to submit proposals that can contribute to the government achieving its 25% target.
- Government departments should have individual objectives for how much their administrative burdens should be reduced and, if possible, tie this into the budget process.
- Sweden should consider how the Ministry of Finance and the Prime Minister's Office can be tied into the regulatory simplification programme.
- There is a substantial need for the government to take steps to widen the simplification programme to local and regional levels, since often these are the authorities with which small businesses first come into contact.
- Sweden ought to give the issue of different EU proposals greater exposure in debates. The OECD points out, for example, that there is no systematic process for external parties to participate in the work.

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18 Better regulation in Europe, Sweden. OECD 2010

## **3 The Regulation Barometer 2010**

### **3.1 Carrying out the survey**

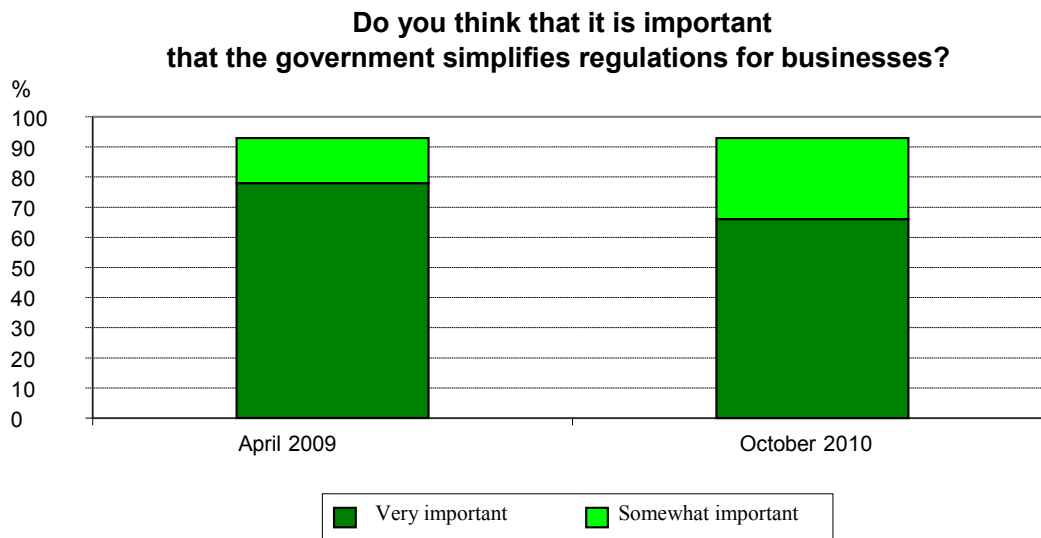
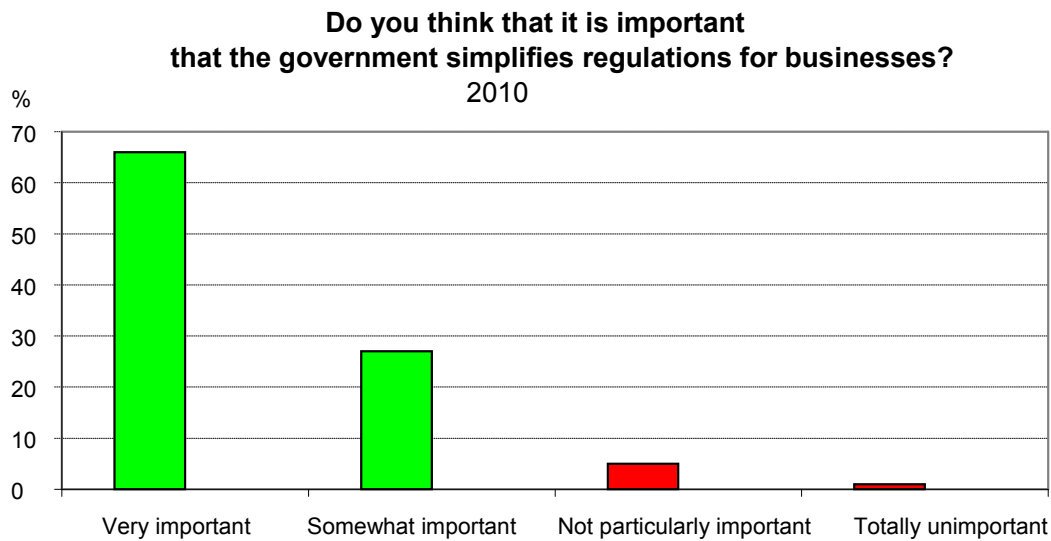
The survey company Skop was commissioned by NNR to conduct a survey of about 600 companies in week commencing 11 October 2010. The survey contained seven different questions about regulation in general and regulatory simplification in particular, and was conducted in the form of telephone interviews. The response rate for the survey was 76%. The shortfall in the survey consists of businesses/business owners who did not wish to participate in the survey and those businesses which the survey company was not able to reach between the dates of 11 and 17 October when the survey was conducted.

The selection was done on a non-proportional stratified basis from SCB's (Statistics Sweden) register of companies. The same size selection was done in six strata, 1-4, 5-9, 10-19, 20-49, 50-99 and 100 or more employees. The selection consisted of companies in all industrial sectors except public administration, defence, mandatory social security and industry sector unknown. The person interviewed in each company was the business owner. The survey was limited to companies with legal form.

### **3.2 Results**

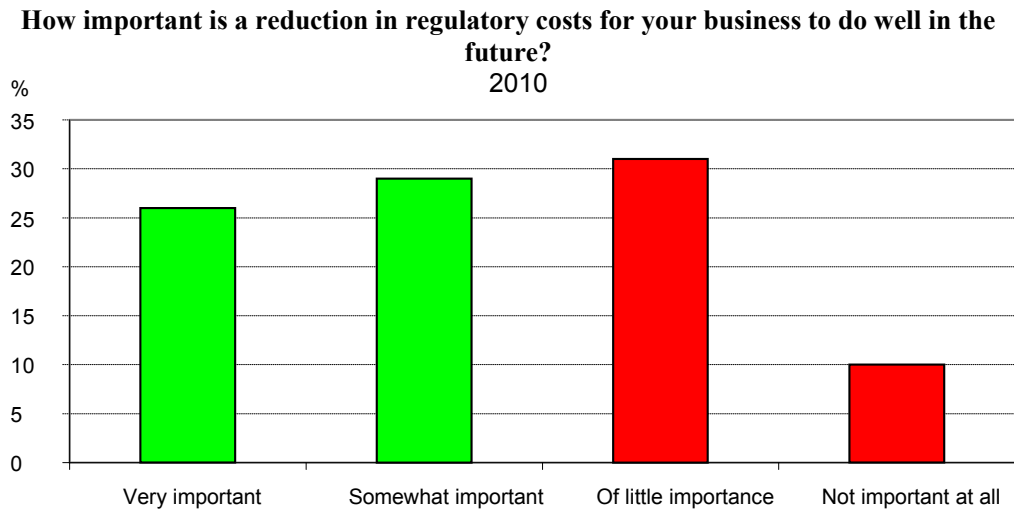
The survey consisted of seven different questions concerning different aspects associated with different parts of the regulations. We will report the outcome for each question and whether there are any differences in those cases where the same question was put in the corresponding survey in 2009.

## 1. Significance of regulatory changes for businesses



Of the businesses surveyed, 66 per cent consider it very important that the government should simplify regulations for businesses. NNR notes some change in the proportion of companies that now consider it very important or somewhat important that the government simplifies the regulations for businesses. The difference is that 12 per cent fewer consider it very important while a greater proportion considers it to be somewhat important. NNR's view, however, is that the survey clearly highlights the enormous importance of continuing to reform and simplify the regulations. We also note that more small businesses with 1-9 employees consider it very important compared with businesses that have 50 or more employees.

## 2. How important is it to reduce the costs of regulation?



A 3. Easier or more cumbersome regulations in the last year 55 per cent majority considers reduced regulatory costs to be very or somewhat important for their business to do well. Moreover, 26 per cent responded that it was very important.

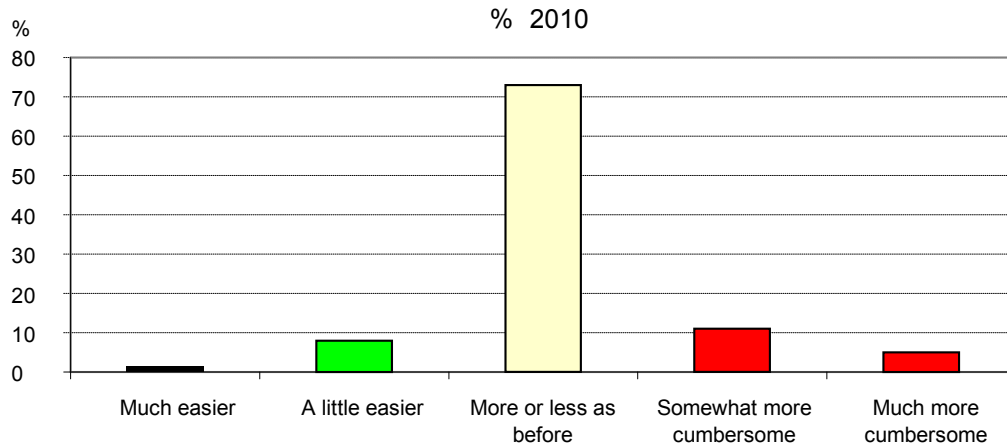
That is slightly fewer businesses compared to the results in April 2009 when 62 per cent considered that regulatory simplification was very or somewhat important for their business to do well. The change amounts to a 7 per cent reduction.

Relatively few people, 10 per cent, respond that reduced regulatory costs are not important at all. A relatively large proportion, 31 per cent, responds that the regulatory costs are of little importance.

The pattern seems to be that the fewer employees a business has, the greater the importance of reduced regulatory costs for the business to do well in the future. This can probably be explained by the fact that business owners in the smallest businesses to a large extent tend to do much of the regulatory work themselves.

### 3. Easier or more cumbersome regulations in the last year

Is your experience that it has become easier or more cumbersome for you and your business to comply with government regulations compared to a year ago?

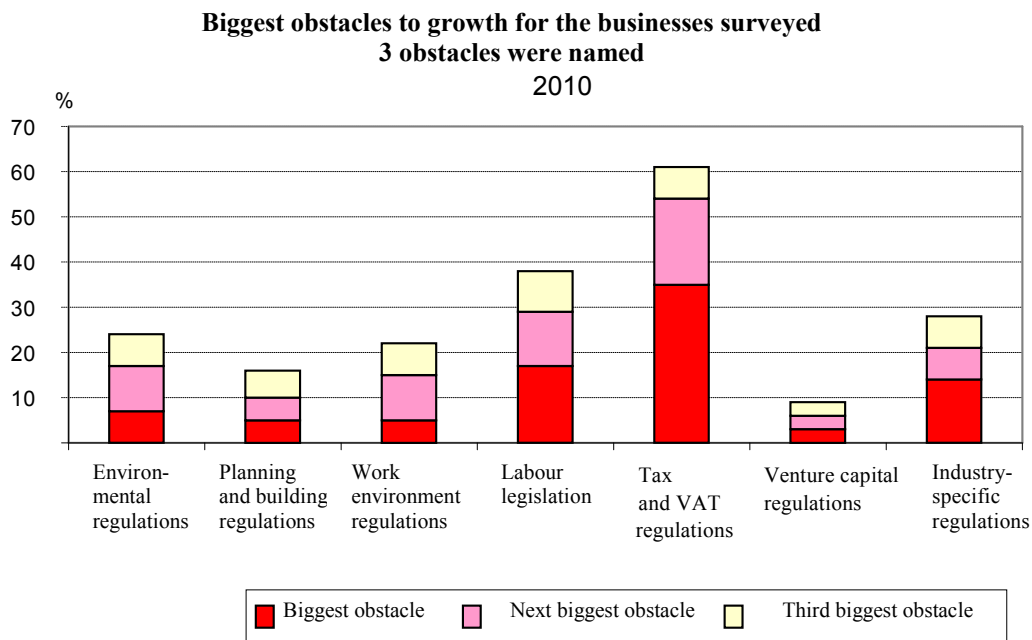


Nine per cent responded that it had become easier while 16 per cent considered that it had become more cumbersome. Most businesses/business owners – 73 per cent – have not experienced any change during the last year. Compared with 2009, more consider that it has become more cumbersome, 16 per cent in 2010 as opposed to 12 per cent in 2009. As regards the proportion that considers that it has become easier, the proportion amounts to 9 per cent in 2010 whereas the proportion was 11 per cent in 2009.

#### 4. The biggest obstacles to growth in businesses

The interviewers read out seven types of regulatory areas and asked:

- Which regulatory area, in your opinion, presents the biggest obstacle to the growth of your business?
- Which regulatory area, in your opinion, presents the next biggest obstacle to the growth of your business?
- Which regulatory area, in your opinion, presents the third biggest obstacle to the growth of your business?



##### **In first place: Tax and VAT regulations**

Tax and VAT regulations are perceived to be the most serious obstacle to the growth of businesses. A third of businesses (35 per cent) consider the tax and VAT regulations to be the biggest obstacle; a majority (61 per cent) consider those regulations to be the biggest, next biggest or third biggest obstacle.

##### **In second place: Labour legislation**

Labour legislation comes second among the obstacles to growth; 17 per cent consider that labour legislation is the biggest obstacle, 38 per cent respond that it is the biggest, next biggest or third biggest obstacle.

##### **In third place: Industry-specific regulations**

Industry-specific regulations come third among the obstacles to growth; 14 per cent consider that industry-specific regulations are the biggest obstacle, 28 per cent respond that they are the biggest, next biggest or third biggest obstacle.



#### **In fourth place: Environmental regulations**

Environmental regulations come fourth; 24 per cent respond that the regulations are among the three biggest obstacles, and 7 per cent consider that environmental regulations are the biggest obstacle.

#### **In fifth place: Regulations relating to the work environment**

Regulations relating to the work environment are the fifth most serious group of obstacles to growth; 22 per cent respond that those regulations are among the three biggest obstacles to growth, while 5 per cent consider regulations relating to the work environment to be the biggest obstacle.

#### **In sixth place: Planning and building regulations**

Planning and building regulations come sixth; 16 per cent respond that the regulations are among the three biggest obstacles and 5 per cent consider that planning and building regulations are the biggest obstacle.

#### **In seventh place: Venture capital regulations**

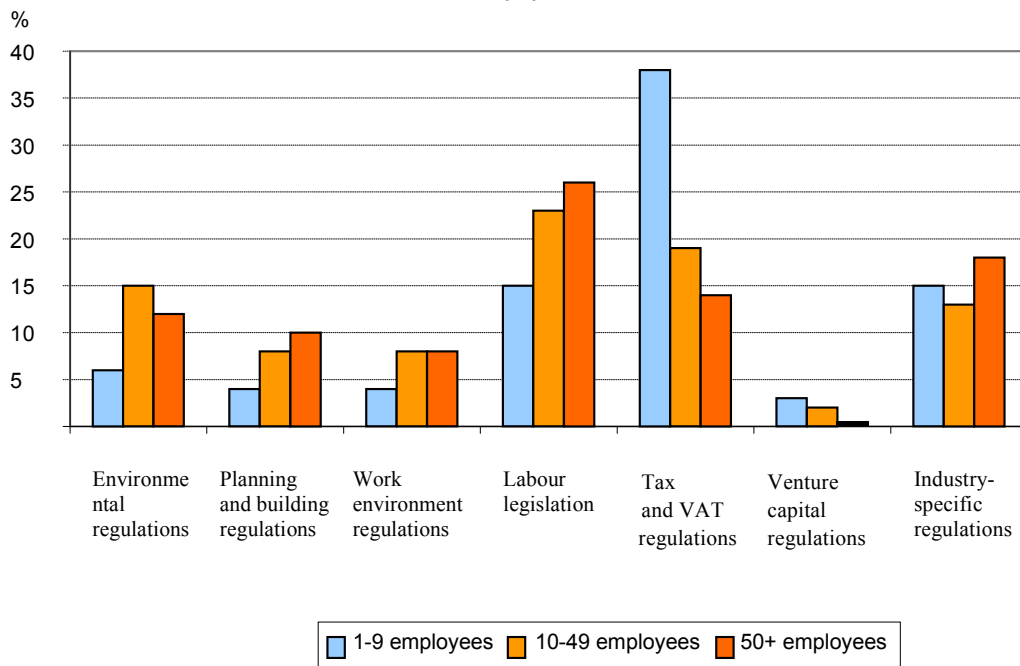
Venture capital regulations come last in the rankings of the seven regulatory areas; 9 per cent respond that the regulations are among the three biggest obstacles, while 3 per cent consider that they are the biggest obstacle.

#### **Differences between large and small businesses**

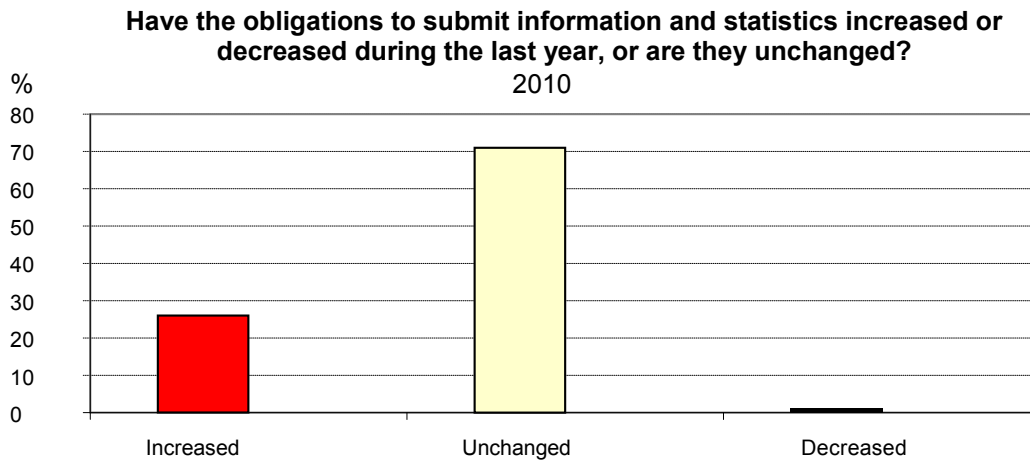
If the size of business is also considered it can be noted that for the smallest businesses with 1-9 employees, tax and VAT regulations are perceived to be the most troublesome; 38 per cent of the smallest businesses consider that these regulations are the biggest obstacle to growth.

For businesses with 10 or more employees, labour legislation is considered to be the biggest obstacle to growth. 26 per cent of the largest businesses with 50 or more employees consider labour legislation to be the biggest obstacle to growth and 23 per cent of businesses with 10-49 employees hold the same view.

**Biggest obstacles to growth for the businesses surveyed  
2010**



## 5. State obligations to submit statistics and other information

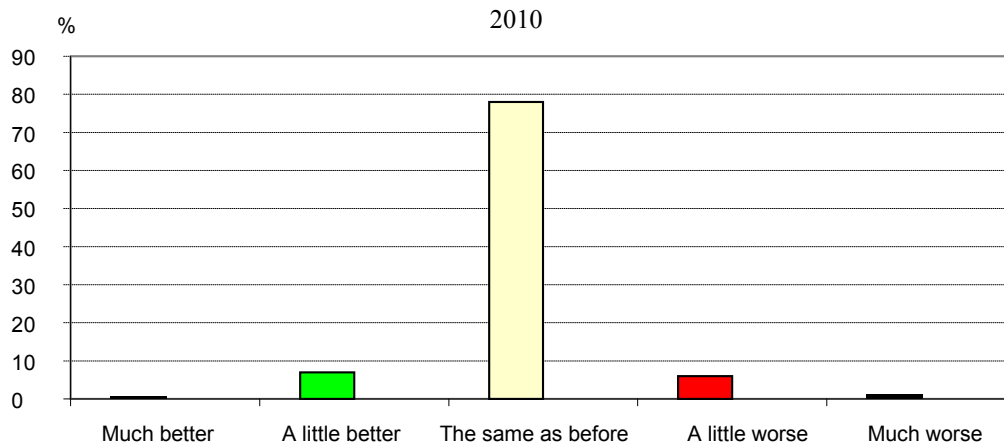


About a quarter of businesses (26 per cent) consider that state obligations have increased during the last year. Hardly any (1 per cent) consider that the obligations have decreased.

Businesses with at least 10 employees consider to a greater degree than the smallest businesses that the obligation to provide statistics and information has increased in the last year. Whether this is an actual increase or a perceived one is not for NNR to say. The need for statistics is an area that grows with time, however. Society evolves in different ways and politicians and state agencies thus automatically need more statistics in new areas and for new phenomena. The problem in this context is that it is much more difficult to remove old surveys and different variables than to introduce new ones. Once a survey has been conducted for a number of years, it is very easy for any user of statistics to justify the need for it. Unfortunately, this seems to weigh heavily in relation to the costs the requirement places on the business. In order to reach a more equal balance between the different interests, NNR sees a need for state agencies responsible for statistics to have an up-to-date list of the number of users, types of users, etc. for each survey and different variables. These lists can then be used in discussions on priorities as to which surveys/variables can be removed.

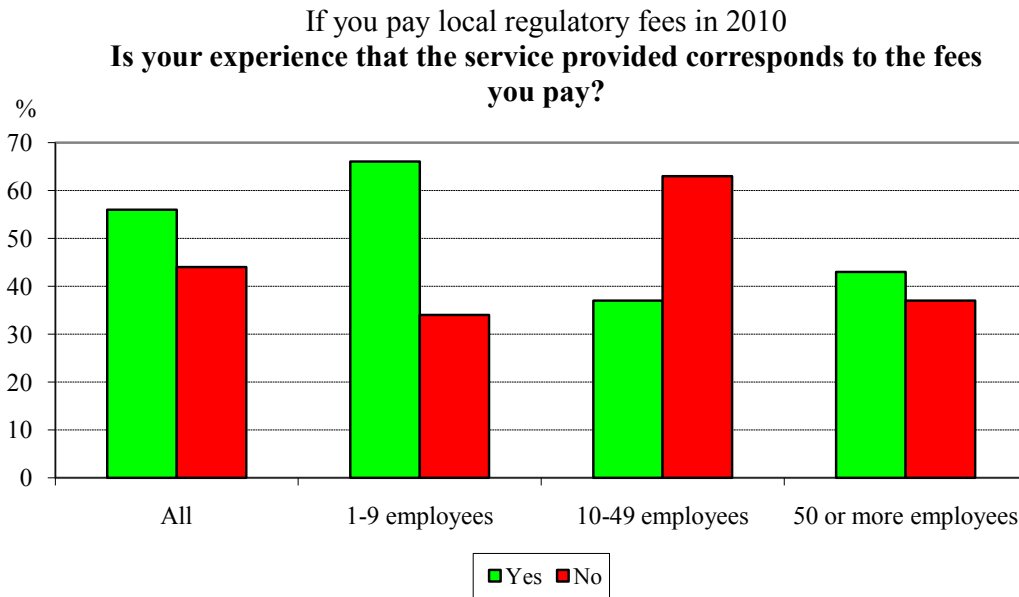
## 6. Local authorities' attitudes, service and availability

**Have the local authority's attitude, service and availability improved or worsened during the last year? Or are they the same as before?**



The proportion that considers that there has been a worsening and the proportion that feels there has been an improvement are equal; both amount to 7 per cent. A very large majority of businesses – 78 per cent – perceive local authorities' attitudes, service and availability as unchanged during the last year. This suggests that there is much room for improvement in the local authority administrations.

## 7. Local regulatory fees



A quarter of businesses – 25 per cent – pay local regulatory fees. According to our survey, large businesses do so to a much greater degree than smaller businesses. There is also substantial variation between different industries.

44 per cent of businesses that pay local regulatory fees consider the service provided does not correspond to the fee they pay. It is to be noted, however, that the majority – 56 per cent – consider there is a balance between the fee and the service they receive in return.

### 3.3 Other surveys

On 14 June 2010 SEB<sup>19</sup> presented a survey concerning how different businesses view the issue of growth and which obstacles businesses perceive to their growth. The survey was sent to 1,300 business owners and the response rate was about 98 per cent. The survey posed several questions related to how businesses view the wording of different regulations.

The results show that 44 per cent consider there are risks in taking on more employees, which can probably be explained by how the labour protection regulations are worded. 42 per cent of the businesses surveyed considered that taxes and regulations were an obstacle to growth, while 8 per cent did not consider there to be any link. The proportion who considered the regulations to be the biggest obstacle to growth amounted to 41 per cent. The biggest obstacle to growth was considered to be high staff costs by 52 per cent of businesses, with the pressure of tax coming second as an obstacle cited by 47 per cent.

NNR's finds that SEB's survey, in many respects, supports changing a substantial number of regulations in order to create better conditions for growth.

The Swedish Food Federation, Li, surveyed its member companies in the autumn of 2010 for their views of the work implemented by the government<sup>20</sup>. It is noted from Li's survey that 70 per cent had not noticed any substantial difference as a result of the reforms the government had pushed through in the food sector. As regards general areas such as the environment, labour legislation and tax, 85 per cent responded that they had not noticed any difference.

However, a substantial majority of the companies surveyed considered it is important or very important to simplify the legislation in the food sector – a total of 64 per cent. It is also clear that 37 per cent of the companies surveyed were pleased with the effect of the implemented measures in terms of their work; 29 per cent considered that the measures implemented resulted in lower costs and 28 per cent were of the view that the measures saved time.

It is also worth noting that 31 per cent consider that the food regulator should provide more advice for businesses. Furthermore, 47 per cent consider that regulatory control checks of the companies affected should be carried out with uniform frequency. Only 2 per cent of companies see much room for improvement with more control visits.

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19 See <http://www.seb.se/pow/wcp/index.asp?website=TAB2>

20 See Li's economic briefing October 2010, [www.LI.se](http://www.LI.se)

### **3.4 Summary of comments**

NNR's survey shows that much remains to be done for businesses to notice any difference. The survey also shows that there is reason to review the order of priorities. Surveys of this type can be a tool to highlight areas and present specific measures for different areas. Our survey shows that there is a demand for measures in general areas such as tax and labour legislation, but also that many businesses are strongly affected by industry-specific regulation. In other words, both breadth and depth are required for future reform.

As regards the issue of obstacles to growth, this feels like a very important dimension to consider in future work. NNR's surveys are of a simple nature and provide a road-map as to which areas need to be prioritised with appropriate measures. In order to make progress, deeper analyses are necessary concerning what constitute obstacles to business in the different areas of regulation.

NNR finds it interesting and helpful that more participants monitor the effects on different areas and how different industries view the implemented processes. The objective must despite all be for more businesses to feel the effect of, and be able to make use of, measures that have been implemented. Increased knowledge of the results is always welcome knowledge so that efforts can be improved and made more effective. However, the low proportion of businesses surveyed that have actually noticed any real difference supports NNR's position that the process must be modified in several respects. How this should be implemented is explained in the proposals chapter that follows.

## 4 System proposals

The two preceding chapters show that the work on reform and its direction should be reviewed. In this section NNR suggests a number of system-wide measures that in the long term and taken together should be able to contribute to reduce the regulatory costs to businesses, remove unwanted indirect effects and get at those problems that various business surveys and other experts have highlighted as relevant problems.

- 1** The changes that are made to the existing regulatory system must be those demanded by businesses in Sweden. Working methods must become more results-orientated in order to resolve different regulatory problems more quickly..
- 2** Choose the option that involves the lowest costs for the companies that are affected.
- 3** A broader systematic discussion of regulations and the effects.
- 4** Evaluate ex post what effects different regulations have had.
- 5** Undertake and publish national impact assessments (IAs) of proposals to be negotiated with in the EU.
- 6** Set up a common register for company data so that the same information does not need to be submitted several times to different state agencies.
- 7** Include and intensify research relating to studies concerning the effects of different regulations and how they affect businesses..
- 8** Engage external expertise that can be helpful in providing knowledge concerning appropriate methods and courses of action to undertake advanced IAs. State agencies must monitor the consequences of decisions taken in accordance with their obligations.
- 9** Introduce as a primary rule that national requirements should not exceed what is prescribed by EU legislation.

## 4.1 NNR's recommendations

### **1. The changes that are made to the existing regulatory system must be those demanded by businesses in Sweden. Working methods must become more results-orientated in order to resolve different regulatory problems more quickly.**

NNR demands measures that aim to reduce businesses' direct regulatory costs, remove unwanted indirect effects or remove aspects of the regulatory system that create unnecessary irritation. In this respect the work ought to be based to a greater degree on what is demanded by businesses as well as what researchers and other experts highlight about relevant action areas.

Reform must be directed to a greater degree to measures that promote growth and address areas that businesses identify as needing to be changed. These may be obstacles to extending production capacity itself, the development of new products and services, accessing venture capital, etc.

As regards working methods, we see a need for the establishment of a more results-orientated process. Action needs to be taken on a number of priority issues and key areas. For example, various operational teams with representatives from commerce and industry, the relevant government agencies and ministries with a clear mission and mandate should be able to handle the work on reforms.

### **2. Choose the option that involves the lowest costs for the businesses that are affected.**

Every decision concerning new or modified regulations involves striking a balance between the purpose of the regulations and various possibilities to shape the regulatory regime in order to achieve the objective. NNR considers in order to strike a balance between different interests and possible options, high-quality IAs are an important part of the basis for decision. It is simply a case of getting things right from the outset taking into account the interests of all the different groups involved.

As to discussions on the choice of method of control and how the different regulations take shape, there are several alternative solutions. Reviews preceding substantial changes generally present a proposal for every issue included in committee directives. A substantial problem in the Swedish process is that it seldom includes a discussion as to whether the option being presented is the best possible to a given issue.

Reviews should in most cases be given a more open mandate to present alternative solutions to the current wording of the directive. Otherwise there is a risk that the politicians responsible think they are choosing the best solution, but this is far from certain, because the proposal has not been compared with any real alternative solutions. Impact assessments can be a tool to prioritise between such alternatives, and it is important that the reason for the selection is clearly documented.

Moreover, it is an issue that the government should push at all levels of co-operation with other EU countries as regards the choice of common regulations and the choice of regulatory options.



### 3. A broader systematic discussion of regulations and the effects.

In this report, NNR has argued that a reduction in administrative regulatory costs alone is not enough to bring about a noticeable difference in the day-to-day running of businesses. NNR is not aware of any empirical study that can show a connection in real terms between reduced administrative burdens alone and growth, which after all is the government's overall objective with the reform.

NNR has devised a method to estimate individual businesses' "total costs of regulation". This method enables an estimate to be made of the administrative, material and financial costs of regulation that Swedish businesses have incurred in order to comply with all the requirements of legislation and the regulations in the course of a year.

One conclusion from NNR's project about the total regulatory costs and other surveys is that businesses face significant costs in meeting different requirements beyond what can be defined as administrative burdens. Businesses see no reason to exclude essential aspects from a systematic discussion about regulation and its effectiveness. The fact that it is more complicated politically to discuss issues in connection with material and financial requirements need not mean that fundamental issues are never on the agenda. It must be in both the national interest and that of businesses to arrive at solutions that are as effective as possible.

If nothing is done as regards the direction of the work on reform itself, NNR feels that it will be very difficult to address several of the issues that businesses have highlighted and regard as relevant problems. The work that has been started at a local and regional level is helpful and should be continued. In extension, action must be taken to resolve issues such as, for example, considerably varying turnaround times, inconsistent application of the law in the same regulations, and local regulation fees that have a clear connection between fee and service in return.

The government's official communication states that regulatory simplification is a process<sup>21</sup> primarily aimed at generating growth, which probably requires other types of measures than those taken during the last parliament. Attention has begun to be paid to businesses' various regulatory costs, including in the official communication 2008/09:2006, which contains a section stating that the costs to businesses of fulfilling their obligations in accordance with legislation and regulations in effect can be divided into administrative, material and financial costs.<sup>22</sup> NNR is calling for a continuation of this important part, however, and adds that the report's insights should be complemented with specific content regarding what the work should comprise, and how and when it should be undertaken.

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21 See p.7 Expl. Note to Reg. 2009/10:226.

22 Regeringskansliet (Swedish government offices) (2009) The government's official communication 2008/09:206 Regulatory simplification, pages 6 and 7. .

#### 4. Evaluate ex post what effects different regulations have had.

Deciding which measures are the most appropriate is fraught with difficulties of various kinds. For example, it is difficult to know the exact effect a measure will have in preventing air pollution and what consequences it will have for the businesses concerned. State agencies have an obligation according to several different pieces of legislation and regulatory circulars within the framework of their legal regulatory powers, a related obligation to “monitor developments and suggest changes” in a limited area.

In other words, in reality there is a requirement that they evaluate the effectiveness of legislation on an ongoing basis. Unfortunately, it is only in exceptional cases that this is done. Whether the state agencies should have the role of investigating their own operations may be called into question. Bearing in mind the small number of evaluations presented, NNR finds that the responsibility should lie with a more independent party instead.

There is also a need for studying the effects of the whole regulatory system, since national reviews tend almost exclusively to be tasked with looking at well defined changes. The mode of procedure is all too seldom a discussion about the issue in its entirety.

The incidence of what is known as political failure according to the public choice<sup>23</sup> theory may be yet another reason for the effectiveness of different regulations and methods of control to be reviewed at regular intervals.

Many countries use perception surveys<sup>24</sup>, which are surveys of how businesses perceive regulations. In simple terms, this is about ascertaining whether the public administration’s “customers” are satisfied. It would be relatively simple for the Swedish government to start an evaluation of the results of the regulatory simplification efforts. Most state agencies already do customer surveys of various types, but it is important that other types of questions are asked in these surveys.

As mentioned in chapter 3, NNR has launched a study that follows up the results of work done on regulatory simplification in Sweden and set up the annual survey The Regulation Barometer. The aim of the survey is to give a comprehensive picture of how businesses see the issue of regulation, implemented changes and needs. Our finding is that the government itself ought to conduct similar surveys in order to achieve a more evidence-based direction to its programme and to monitor developments over time.

It is probable that the EU Commission’s Smart Regulation programme, where evaluation will play a central role, will bring to the fore the need for Sweden to consider how we should respond and participate in the Commission’s future evaluation work.

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23 For an overview, see Berggren, Niclas (2000). “Public Choice”. In Norberg, Johan (red) *Stat, individ och marknad: sex skolor i samtida samhällsfilosofi*. (State, individual and market: six schools of contemporary social philosophy) Stockholm: Timbro: 49-82.

24 In the last three years, the British National Audit Office has conducted an annual survey aimed at assessing whether the British government’s regulatory simplification programme has delivered the results that had been promised to industry. Se vidare till exempel United Kingdom National Audit Office (2009) *Complying with Regulation*: See further e.g. United Kingdom National Audit Office (2009) *Complying with Regulation: Business Perceptions Survey 2009* Business Perceptions Survey 2009

## **5. Undertake and publish national impact assessments (IAs) of proposals to be negotiated within the EU.**

Owing to Sweden's membership of the European Union, a large proportion of our regulatory regime originates in decisions made in Brussels. Naturally the proportion varies depending on how integrated the common policy is in each area. Areas such as customs and food have a large proportion of common regulations, whereas the tax area, for instance, has relatively speaking a smaller number of common regulations, with the possible exception of regulations relating to value added tax.

In order to be able to influence the Commission to present regulations that are well-suited to Swedish interests, it is important to know how the proposal will affect Swedish interests. Certain Member States have realised the importance of clear, early and transparent analysis of how different proposals may be expected to affect the individual member state. Bearing in mind that it takes a long time to bring about change in different regulations at EU level, it is important from the outset to achieve solutions well-suited to Swedish conditions.

In Sweden there is a preparatory process in certain areas that makes it possible to submit comments on the issues that are to be discussed, e.g. the Swedish Board of Agriculture and the Swedish Food Agency, whereas in other areas there is actually no external opportunity to learn what will be discussed or to submit comments. NNR's view is that Sweden must produce uniform guidelines for the management of different EU proposals that are to be negotiated. The public administration needs to report more openly what effects the proposals may entail for Sweden. Such a process would enable different interested parties to submit comments more easily to those who are to represent Sweden in the negotiations.

NNR welcomed the Administration Committee's proposal that refers precisely to the fact that the Swedish public administration should act at an earlier stage in the European decision-making process and thereby influence to a greater degree decisions taken within the EU. Like NNR, the study suggests that an early national impact assessment should be included in the preparatory work relating to any issue where a Swedish position is to be established, in what the committee referred to as "seamless preparation". It is important that improving the EU programme should continue in line with the Administration Committee's recommendations and bill 2009/10:175 Public administration for democracy, participation and growth.

NNR considers that it is too late to start work on a national impact assessment when implementing a decision into Swedish law, since it is no longer possible to influence the wording of the new legislation at that point.

Furthermore, all those representing Sweden at EU level should be charged with demanding the EU Commission produce impact assessments for all proposals in order to arrive at the least costly solution.

**6. Set up a coordinated register for company data so that the same information does not need to be submitted several times to different state agencies.**

For a long time NNR has been pushing the issue of a coordinated register for company data and the Swedish Companies Registration Office has reviewed the issue at the government's behest. The Swedish Companies Registration Office delivered its final report in April 2009. It contained several specific suggestions as to how corporate reporting can be reduced and how state agencies' handling of information can be co-ordinated, streamlined and re-used. The Swedish Government Office is still processing the issue and it is now high time that words should turn into action.

**7. Include and intensify research with studies concerning the effects of different regulations and how they affect businesses.**

There are researchers around the world who take an interest in how institutions in society are formed and address issues relating to the effects of different regulations. NNR notes that from a Swedish point of view there is hardly any research in this area. Tillväxtanalys was commissioned to start this research in Sweden and this commission needs to be extended so in order to produce some long-term results.

The purpose of this type of research is to shed light upon the institutions' functionality, map the effects and study their effectiveness, which should be interesting issues for the majority of politicians. NNR considers that we need to push for more comprehensive research of this type in Sweden as well.

**8. Engage external expertise that can be helpful in providing knowledge concerning appropriate methods and courses of action to implement advanced IAs. State agencies must monitor the consequences of decisions taken in accordance with their obligations.**

What should be answered as regards the content of impact assessments is well documented in Sweden. However, the difficult issue is “how” the questions should be answered. In many cases, the questions may be complex ones, of a scientific or socio-economic nature, where considerable methodical support is required in order to be able to elucidate the issue of expected impacts in a qualified manner.

In order to raise the quality of impact assessments, sufficient support must also be given to the official who prepares the different regulatory proposals. It can therefore be an important step for the national administration increasingly to engage more external expertise, for example, from consultants or experts from the academic world. This is likely to be more resource-effective than for the state itself to build up the overall competence within its administration.

However, quality assurance in terms of impact assessments and a basis for decision-making are just a first step on the way to a decision that will in turn lead to more efficient, is cost-effective and business-friendly regulations. The next step is about actually using the impact assessments as a basis for decision-making. It is unnecessary to employ resources to create impact assessments that are either carried routinely because they have to be done or in order to justify decisions that have already been made.

A certain amount of caution is necessary as regards the results of impact assessments. To the extent that they are worked on with a future perspective – before an event – the figures and analyses should not be regarded as being too exact. To this end the application of Section 8 of the Swedish Code of Statutes ordinance (2007:1244) is highly significant. The section states: “A public authority shall monitor the impact of its regulations and general guidance. If the basic prerequisites for the regulation have changed, then it shall be reviewed and a new impact assessment shall be carried out.”

NNR considers that it is of the utmost importance that the obligation is observed and this is also connected to the need we identified for evaluations to be carried out to a greater degree than what is currently being done (see also item 2 above).

**9. Introduce as a primary rule that national requirements should not exceed what is prescribed by EU legislation.**

Currently there is a lack of systematic work to counteract the tendency to over-implement the introduction of EU regulations. What happens is that Member States, including Sweden, introduce further national regulations – what is known as gold-plating – when new EU regulations are introduced. Over-implementation worsens Swedish companies' competitiveness and growth potential compared to other Member States that do not add further requirements. The government should therefore work actively to minimise the incidence of gold-plating.

## 5 Specific regulatory proposals to be addressed between 2011 and 2014

In the autumn, NNR's members each compiled proposals for changes to various elements of the regulations which each organisation judged to be desirable to implement. It can be noted that in many instances the proposals highlight how essential it is to widen and deepen regulatory reform.

NNR wishes to draw attention to the fact that there are a number of new proposals compared to the previous parliament and that many member organisations have highlighted proposals that were not implemented during the previous parliament. It should be noted that the members support the proposals in their personal capacity. Please contact the member organisations to discuss any issues related to the proposals.

To access all of commerce and industry's collected proposals go to [www.nnr.se](http://www.nnr.se)

### **NNR's members and the URLs of their websites.**

FAR	<a href="http://www.far.se">www.far.se</a>
The Swedish Association of Property Owners	<a href="http://www.fastighetsagarna.se">www.fastighetsagarna.se</a>
The Association of Swedish Finance Houses	<a href="http://www.finansbolagens-forening.se">www.finansbolagens-forening.se</a>
The Swedish Investment Fund Association	<a href="http://www.fondbolagen.se">www.fondbolagen.se</a>
The Swedish Federation of Business Owners	<a href="http://www.foretagarna.ss">www.foretagarna.ss</a>
The Federation of Swedish Farmers	<a href="http://www.lrf.se">www.lrf.se</a>
The Swedish Bankers' Association	<a href="http://www.swedishbankers.se">www.swedishbankers.se</a>
The Swedish Securities Dealers Association	<a href="http://www.fondhandlarna.se">www.fondhandlarna.se</a>
The Association of Swedish Chambers of Commerce & Industry	<a href="http://www.cci.se">www.cci.se</a>
The Swedish Petroleum Institute	<a href="http://www.spi.se">www.spi.se</a>
The Swedish Newspaper Publishers' Association	<a href="http://www.tu.se">www.tu.se</a>
The Swedish Energy Agency	<a href="http://www.svenskenergi.se">www.svenskenergi.se</a>
The Swedish District Heating Association	<a href="http://www.svenskfjarrvarme.se">www.svenskfjarrvarme.se</a>
The Swedish Industry Association	<a href="http://www.sinf.se">www.sinf.se</a>
The Confederation of Swedish Enterprise	<a href="http://www.svensktnaringsliv.se">www.svensktnaringsliv.se</a>

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# Board of Swedish Industry and Commerce for Better Regulation

The Board of Swedish Industry and Commerce for Better Regulation (NNR), formed in 1982, is a not-for-profit organisation. Its members include 15 Swedish business organisations and trade associations which together represent more than 300,000 companies. NNR's function is to work for simpler, more business-friendly regulations and a reduction in companies' submission of information to government in Sweden and the EU. NNR co-ordinates regulatory simplification efforts for business at a national and European level, making NNR unique among business organisations in Europe. More information on NNR is available at [www.nnr.se](http://www.nnr.se).

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