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**BETTER REGULATION THROUGH  
IMPACT ASSESSMENTS**

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## BETTER REGULATION THROUGH IMPACT ASSESSMENTS

*On the demands on EU member states to consider the consequences of new  
regulation – and Sweden's observance and resistance*

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### Introduction

As one ingredient – the most important, some would say – of the European Commission's efforts to improve the quality of European regulation and legislation, under the concept of 'better regulation' and a part of the Lisbon strategy for growth and jobs, there is the method of regulatory impact assessment, RIA. Many different actors, as the European Commission, OECD, organisations of business and environmental protection, as well as management consultants, have for some years now, if not always in coordinated attempts, been trying to convince EU member states to adopt a certain kind of impact assessments ahead of new laws and regulations. Through this procedure different alternatives are meant to be analyzed and evaluated, to get a picture as clear as possible of the different consequences of the proposed regulation on environment, society and – above all – on enterprise and competition.

Sweden is since long thought to be one of the countries with a long road already travelled when it comes to better regulation through impact assessments. But it is actually only recently that the Swedish Government has taken a firm grip on the issue, at least on paper. On 15 May this year (2008) the Swedish Government decided to set up an advisory Regulatory Board with the instruction to assist the government and the agencies in regulatory simplifications aiming at cutting the administrative burdens of enterprises.<sup>1</sup> As late as early this year several disparate ordinances aiming at the agencies were replaced by a new Ordinance on Regulatory Impact Assessment. The ambition is that this ordinance also should be applied in the work of the ministries, as well as in the preparatory work of the many different law drafting committees, but this still awaits its formal decision. And the handbooks and guidelines for

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<sup>1</sup> The Regulatory Board will also examine the quality of regulatory impact assessments, if only regarding those with possible effects on enterprises. The Board will be dismantled at the end of 2010.

agencies as well as ministries are yet to be written, drafted and published. But there should be no doubts regarding the main focus of the (new) Swedish Government better regulation strategy: cutting administrative burdens and improving the conditions for enterprises.

Why these efforts now and why this particular design (described in more detail later in this paper) chosen? Well, as there have been interesting attempts to explain why (new) public management reforms often are implemented in a country-specific 'manner', and why similar reform recipes give different results in different countries and in different institutional contexts, this paper will draw on these insights and will, if only briefly, *examine the diffusion and translation of a specific set of reform ideas*, and, (as for instance Pollitt & Bouckaert (2006) and Radaelli, De Francesco and Troeger (2008)), *discuss the key factors that may influence the speed, scope and depth of these reforms; in this case focusing on Swedish regulatory reform and the Swedish use of impact assessments*. The paper will also *shortly examine the factors explaining the (possible) differences in Sweden between rhetoric and practise*, as well as *presenting some concrete proposals on how Sweden should act at the European and the national level to benefit even more from the use of impact assessments in governmental law making and in agencies' regulations* – without losing any advantages of the already existing system for law drafting. A preliminary conclusion could be that the stream-lining ambitions of the EU Commission and the OECD do not always reflect or consider the different member states disparate law making structures and contexts.

This paper also draws from and finds theoretical inspiration in discussions on states' 'embeddedness' in EU and the world, which to a certain degree transforms states, from rule makers to rule followers (Jacobsson and Sundström 2007; Brunsson and Jacobsson 2000; Levi-Faur 2005; Jacobsson and Sahlin-Andersson 2006; Djelic and Sahlin-Andersson 2006). States are as we know surrounded and perforated by an enormous amount of regulation that has not been decided by the states themselves, but that they still is expected to follow, even though many of these rules are presented as advices, standards and recommendations and not being legally binding (Mörth 2004). The acceptance and participation are voluntary but the states are still 'forced' to somehow handle these standards; standards that often have strong advocates trying to influence states to changed behaviour through papers, conferences, benchmarking and rankings.

### **Some of the promoters**

In an ambitious pan-European arrangement of many partner institutions – called European Network for Better Regulation (ENBR) and in which this paper is to be presented – the aims are to 'improve and disseminate the current knowledge on regulatory processes as well as the degree and mode of

implementation of impact assessment procedures in EU member states', due to the network's website (ENBR 2008). In this project there is also a broad inventory of the member states' status and implementation of better regulation formulas, as well as implicit evaluations of the progress and failures of the regulatory impact assessment systems in the different member states. Even though the states' regulatory contexts differ considerably, ENBR – as well as other promoters as the EU Commission and OECD – fosters hope for a general recipe for how to be successful when implementing and following impact assessment procedures.

There are still different views on how and when in the regulatory process to perform a 'perfect' impact assessment. But the EU Commission and the OECD, as well as influential consultants promoting standardized models and instructing top civil servants in the art of assessing the impacts of new regulations, are becoming more and more coordinated. The law making processes of the EU member states are scrutinized at regular intervals in different projects, often financed through the EU Commission (as is the case with the Matisse-project and ENBR). In studies performed by these actors, existing structures and systems are compared with ideals, often ending with recommendations of improving and changing the regulation processes. The overall aim could (probably mistakenly) be taken for an harmonisation between member states on how to on a national level 'make law', or at least that every law making process should result in a separate and official document where different alternatives are presented and analysed, where the impact of the regulation is assessed, and where the results of a consultation process are illustrated.

Those familiar with the Swedish law making process – with explicit demands on analysis of consequences in ordinances guiding the regulatory work of committees and agencies, with often long-term inquiries, high participation of different actors and interests, with legible elements of openness and easy access, where proposed measures are referred for consideration to agencies, enterprises and citizens, and with collective decisions within the Government where every ministry have a say on every proposal – might think that Sweden should be among the high-ranked when it comes to RIA: almost every aspect and impact should be considered with such a 'proper democratic order'. Many of the criteria in the standards models are met, but the Swedish processes, at the government level, do seldom result in separate and discernible documents where the impact assessment is presented, and that is a absolute requirement. Neither is there yet any Swedish abundance of more econometric inspired tools for analysis, endorsed in the standard models. The picture from the agency level is somewhat different. Almost 10 000 impact assessments are carried out the last five years by Swedish regulatory agencies – but the overwhelming majority of these are just a couple of sentences long, and do not meet the standards for receiving golden stars.

The Swedish difficulties, although somewhat deliberate, in fulfilling the expectations are shared with many other EU member states. RIA still seems more of presenting a strategy than to follow it, illustrated by the fact that almost every EU member states have ambitious policy programmes under the headlines of 'better regulation' and 'regulatory impact assessment' (certainly so in Sweden as well), but only a few of them have only few 'correct' and 'complete' impact assessments to put on display. Important so say, even if the formal documents are of poorer quality than the EU Commission and others wish for, the processes behind new laws and regulations could still be satisfactory on both issues of assessments and consultations.

### **On Sweden and the many 'impact assessments' in the Swedish system for decision making**

Even if many European advocates of impact assessment procedures often attach importance and weight also to the analysis of consequences on environment, man and society, the main focus of the new centre and right wing Swedish Government is to reduce administrative burdens for enterprises. In the recently issued policy statement on impact assessments the Swedish Government declared that every single ministry and agency (there are over 500 agencies in Sweden, and the lion part of these have the right to issue regulations, on delegation from the Government), should perform impact assessments (or 'analysis of consequences' which is more in line with the Swedish concepts) as part of the preparatory work when issuing laws and regulations, for the sake of simplification, but most important, to 'clearly asses the cost of the regulation on administrative burdens' (Ministry of Enterprise, Energy and Communications 2008, author's translation). Impact assessments are regarded as playing a decisive role on the Government's political goal of reducing the administrative burdens that stems from state regulations with 25 percent before year 2010. Sweden is thus following several other examples, mainly the Netherlands and the United Kingdom. An interesting issue at stake is how well these new demands fit with the Swedish law making process.

The forms of Swedish RIAs are varied and not easily classified (Radaelli 2008) and we might speak of as many as four or maybe five different variations of RIAs. The Swedish (and the Finnish) systems for decision-making, at the level of Government, are based on collective decisions within the Government – all ministries are able to have a say on proposals. This principle is meant to secure all aspects of a Government proposal. But the proposal, for instance a bill to be passed on to the parliament, have also been analyzed in depth, at the ministries or elsewhere, ahead of the final discussion and decision within the Government. For this preparatory work the ministries of the Government often establishes committees, sometimes with members from parliament. The entire

work of every single of these committees could actually be called thorough impact assessments (but better: policy investigations). In Sweden there are more than 40 at work right now (September 1, 2008), and you could find at least half as many completed every year. This would sum up, just counting Sweden, to a lot more than a hundred impact assessments – although of very different scope and size (actually, some of these would contain several different assessments, making the list even longer). But most of these assessments would not pass the test when it comes to the minimum standard we see in the definitions of impact assessments.

The Government of Sweden also, at least as often as they set up committees, ask different public agencies to analyze certain issues at length and in depth, before proposals of regulation. The studies and research done by these agencies, providing the Government with information and following the so called Committee Ordinance, could in many cases be called impact assessments. The number of assessments performed in this area is hard to estimate. For that, you would have to look through every single government approval document – and the agencies in Sweden alone are as we said more than 500. The actual commissions and assessments could be even more. But neither would these assessments rightly be called impact assessments for reasons mentioned below.

The third collection of impact assessments we find within the public agencies themselves. Many agencies has the right to issue regulations, if only at a lower regulatory level and in order to clarify laws or policies (to call them ‘independent regulatory authorities’ is just partly correct), and also to suggest changes in policy and regulation. For regulation and suggestions they are obliged to make impact assessments of different kinds, depending on the policy area. Here also the number of assessments is hard to pin down. A fourth huge cluster of assessments, about two thousand every year in Sweden alone (!) and performed at different levels of government, are those aiming to analyze the effects of certain regulations on small business. These assessments are the only one that in Sweden could be called explicitly mandatory, earlier following the so called SimpLex Ordinance.<sup>2</sup> But since there is no obligation or no strict format to present the results, the evidences of these assessments are often only a page long, or lesser. Although some of these latest assessments are already counted in the collections above, the total number of impact assessments every year could well reach the number of 2 500.

In Sweden there has not – up to now – been any single written guidance or instructions of formats or methods on RIAs, but many, depending on where you sit (in a ministry, in a committee or at a public agency), and the purpose of

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<sup>2</sup> The Agencies and Institutes Ordinance (Verksförordningen, 1995) and the 1998 SimpLex Ordinance on small and medium enterprises were recently replaced by a new and more integrated Ordinance on Regulatory Impact Assessment (Förordningen om konsekvensutredning vid regelgivning, 2007).

the assessment (environment, small business, gender, economy etc.). Some overarching instructions and handbooks have been specific, others not. When we look at the level of public agencies/authorities we find different guides of impact assessment at almost every different agency with regulatory authority. And many agencies have still more than one guide at work.

In Sweden there are written instructions for bill drafting at the government level, with requests of 'taking all things into account'. In these instructions you find words and suggestions of when to perform impact assessments. These general guides are complemented with more specific ones for different policy areas, with more detailed discussions on processes of actual impact assessments. But to follow these documents, when it comes to RIAs, is not mandatory, and even difficult to follow if you wanted to – for the civil servant in the bill drafting process it is often far from obvious when and how to perform an RIA. There are no sanctions if the requirements in the instructions are not met.

The written guides on impact assessments that stems from some of the more important public agencies in Sweden could well live up to the criteria of a fully implemented model of regulatory impact assessments, but the ordinances and the handbooks issued from the Swedish Government are still too vague to result in consistent and comparable RIA's. In addition, the actual impact assessments done inside the different ministries are very difficult for an outside observer to find. It is almost impossible to collect or get a thorough picture of the impact assessments carried out, as the only survives as bits of paper here and there, and to recapitulate you probably have to go through the whole process once again.

Thus, there is, in Sweden still no explicit or mandatory standard for the content of an RIA, or a standard format for presenting RIA results (apart then from the standards that individual agencies might set up for their own). Some of the presented impact assessments are not more than a single sentence long; others fill a shelf of their own in the library. Sweden of course has a general legislative requirement for RIA, but RIA is not yet operationalized through a standard process and strict instructions. To conclude: RIA, in the 'modern sense', in Sweden is therefore not a part of a system based on a clear scope and directions. There are rules for when impact assessments should be made, but praxis for when they actually are done, how they are done, and the quality of them differ considerably. This is not to say that the issue of better regulation and impact assessments in these countries are of low priority, quite the opposite, I would say! But that's another story, only touched upon above.

To say that Sweden up to now has been ignorant of the consequences of policies is way of the mark. Sweden has a relatively long history of using RIA, and agencies has been obliged to use them since early 1970s (Persson 2003:1). The

system of assessing policy proposals through official Inquires and independent Committees is much older than that and have made Sweden 'naturally' oriented Sweden to evaluation. As has been noted here and elsewhere, there have in Sweden been several RIA systems at work at different levels (Persson 2003, Radaelli 2008). The RIA system applied to central government authorities has been characterised as more consistent and 'more mandatory' than those aiming at the committee's work and the ministries. There are no requirements on separate RIAs at the parliamentary level where the laws are finally decided upon, and there are still no requirements for RIA's at the ministerial level, although the detailed bills often include RIA-type information (Persson 2003:5). There are handbooks to guide the work at the Government Offices as well as the committees and the agencies, but these handbooks are not very explicit on where, when and how to perform impact assessments, more than saying that there should be a focus on the impacts, especially on small business. The instruction to agencies with the right to issue regulations and guidelines simply states that "costs and other consequences" should be investigated. There are actually legal requirements on performing RIAs focusing on small business at the committee as well as the agency level, but, as has been said before, these are often as short as the words 'No impacts on small businesses'. If the impacts are found to be 'significant', Swedish authorities must get the government's approval before implementing the regulations or guidelines. Explicit RIAs (apart from those in ministerial bills or committee's inquires that hardly ever have the shape of a separate document) that do play in a division of their own, are those carried in Swedish environmental regulatory decision-making, prepared by the Swedish Environmental Protection Agency.

The effects of these better regulation measures have not been significant, not if speaking with business organisations as the NNR (Board of Swedish Industry and Commerce for Better Regulation), who has been persistent through many years in criticising the Swedish Government 'for not being more systematic and formal with RIA itself and taking a clear lead' (Persson 2003:11). NNR states that Sweden's extensive regulatory framework forces Swedish companies to be familiar with and comply with a universe of regulations.

'Businesses in this country in 2006 must follow the majority of the 1,270 laws, 2,300 ordinances, and 8,100 regulations and general recommendations that exist. Current business regulations have been estimated as filling no fewer than some 20,000 pages. Every year, in addition, Swedish companies must fill in 94 million forms requested by public agencies' (NNR 2006:2).

Before closing the discussion on the Swedish RIA system we should reiterate that the arrangement is under change, right now. The new 'business friendly', they say, Swedish Government has made it a main task to meet this critique. The Swedish Government has recently updated its simplification action plan,

now including 600 (!) measures that departments and agencies will consider to simplify the regulatory environment for business and reduce administrative burdens by 25 percent by 2010. The Swedish Government is to set up an advisory albeit small Regulatory Board (only three members are meant to take part in the Boards' work) to support the government and the agencies in regulatory simplifications and cutting red tape, thereby reducing the need for earlier (also undermanned) counterparts as Nutek (the Swedish Agency for Economic and Regional Growth) and the Better Regulation Unit within Ministry for Enterprise, Energy and Communications. In the policy statement preceding the formation of the Regulatory Board, the Swedish Government were explicitly referring to similar institutions at the EU Commission, in Netherlands (Actal) and Germany (Normenkontrollrat), and did describe these boards as 'strongly contributing in ... governmental efforts of reducing administrative burdens' (Government Offices of Sweden 2008).

In addition, talking about recent reformation, several incongruent ordinances are now replaced with a new Ordinance on Regulatory Impact Assessment. But the guidelines are still to be written, and there is no decision yet on how, if at all, the new ordinance is to be implemented at the ministerial level. We do also, of course, await possible effects of these changes. The Regulatory Board will also examine the quality of regulatory impact assessments, if only regarding those with possible effects on enterprises. All these measures and ambitions are of course greeted, but with two years already in office, the enterprises are still far from satisfied with the overall effect of the Government's better regulation policy, considered being too slow and too weak:

'NNR's assessment is that, in general, the quality of Impact Assessments (IA) carried out in Sweden is unacceptably low (...) The Government's target for reducing the cost to business of regulation demonstrates an important commitment and appears realistic. However, the Government must now show that the target can be achieved and result in a real difference for our members. This will require political leadership at the highest level and hard work' (NNR 2008).

Even though anecdotic I cannot refrain from telling the story of the last estimation of administrative burdens for Swedish farmers, as a result of the Swedish way of implementing European common agriculture policy. It was said (by Nutek) that complying with regulations cost Swedish farmers 600 MSEK (65 million euros) per year. Conspicuously, the single most burdensome task for farmers was, due to the report, egg-labelling, amounting to 90 MSEK (13 million euros) every year. But Nutek had made the mistake to, instead of multiplying with the total amount of egg-producers, multiplying every farmer's time spent to the labelling task (performed and automated by machines, of course) with the total amount of produced eggs! Someone found out - and in

one pen stroke, the mission '25 percent' so hard strived for, and even more, was accomplished.

### **A note on the travelling, selling and translation of reform ideas**

The promoting of better regulation measures and RIA have lot in common with the 'soft regulation' developed in several others EU policy fields from the Lisbon summit in 2000 and onwards, often referred to as the 'open method of co-ordination'. An important part in these co-ordinations has been played by 'discursive regulatory mechanisms' (Jacobsson 2004:3), related to the use of language and building knowledge. In studying the European employment policy, for instance, researchers have found certain important traits in the development and change of this policy, among these 1) joint language with key concepts, 2) common classifications and indicators, 3) building of a common and standardised knowledge base, 4) strategic use of comparison and evaluation and 5) peer pressure (Jacobsson 2004:3).

All this is well known, of course, and should come as no surprise as this is the way we think progress and development is meant to unfold in almost every field, may it be science, art or sports. But it is strikingly different from the earlier 'ordinary' way of national government or EU integration, through hard law, often preceded by a discourse but then more in the form of negotiation than persuasion. There is also, through the 'epistemic communities' that often develop in these transitions, social mechanisms at play where loyalties may shift and where common cognitive frames develop. In soft regulation arenas you find more of non-state actors, and in the soft law version of compliance there is no immediate obligation to implement new standards; instead the conformity och near-conformity is reached through incremental and gradual recognition, eventually (possibly) challenging national views on different, sometimes sensitive, policy areas and (possibly) alter member states practices (Jacobsson 2004:4).

When the hierarchical control is weaker or absent, as in these methods of co-ordination, audit practises become increasingly important (Power 1997). And by participating in benchmarking procedures there is at least a partial recognition of the underlying norms and objectives (Jacobsson 2004:5). Or, as in the words of Shore and Wright: 'to be audited, an organization must actively transform itself into an auditable commodity' (Shore and Wright 2000:72).

When analysing the many different public sector reforms through the 1980s and 1990s, under the umbrella concept and the almost global trend of 'New Public Management' (NPM), researchers have come to the conclusion that while talking a lot about the necessity of reforms, Sweden has been much more inconsistent in carrying out these talked-about reforms out and, accordingly,

the effects have been less dramatic in Sweden than in countries as United Kingdom or New Zealand. Parallel and similar reform efforts have had different impacts in different contexts (Sahlin-Andersson 2000:1). Why so? This could be said also when it comes to different countries' (at least somewhat) different approaches to and the results of the better regulation trend.

An obvious reason for applying similar reforms could be the facing of similar problems, although similar solutions are hard to imagine without any interaction between states. When reformers of different origins learn from and imitate each other we could instead talk of a reform trend as an effect of ideas travelling around the world (Sahlin-Andersson 2000:2, Czarniawska and Joerges 1996). Another type of trend is neither nationally nor internationally, but 'transnationally' created (although trends as 'better regulation' or 'NPM' are likely to combine elements of all these three). In this last reform category you find, in addition to the national and international reformers, also

'observers and mediators of reform ideas and experiences, such as researchers, international organisations, consultants and publications. They produce and provide information and comparisons, report on and propose initiatives for change and act as arenas for the exchange of experience, ideas and ideals. They assess reforms and publish guidelines for how to reform' (Sahlin-Andersson 2000:3).

Similarities and differences between different approaches are then explained, at least partly, by the differences in how these mediators chose to reflect och construct the reform ideas. But more important; the 'trendsetters' (sometimes) take the easier and non-contextual grip on these issues, and (sometimes) argue that if countries face similar problems they ought to reform along similar lines (Sahlin-Andersson 2000:4). There should though be good reasons for also take other and more contextual aspects into account, as has been done when analysing diverse results of New Public Management reforms. *Constitutional arrangements* (Olsen and Peters 1996), *administrative systems* (Hood 1995; Christensen and Laegreid 1999), *reform traditions* (Pallott 1998), *cultures* (Christensen and Laegreid 1999), *changing political majorities* (Mascarenas 1990), and *economic situations* (Olson et al 1998) matters in such way that they influence the motives governments have 'for launching reform, what opportunities are available to them and what changes such reforms lead to' (Sahlin-Andersson 2000:4, Radaelli, De Francesco and Troeger 2008). An understanding of different contextual conditions should then be a winning recipe for transnational reformers. But still, - a remark maybe uncalled for - some reform features may be mimicked, others ignored.

For a national civil servant, bringing reform ideas produced elsewhere home, there are many different sources of influence: as reports, visits and consultant

advices. But the imitating actor has possibilities and often good reasons for 'translating, filling in or editing the model in various ways' (Sahlin-Andersson 2000:7), and the imitator has of course also a difficult task in selling and manufacturing the model, even if translated, to others back home.

Better regulation, as with the NPM trend, is thought to be relevant wherever it is implemented.

'There is nearly universal agreement that RIA, when it is done well, improves the cost effectiveness of regulatory decisions, reduces the number of low-quality and unnecessary regulations, improves the transparency of decisions, and enhances consultation and participation of affected groups' (Humbeeck 2007:3).

And, as was the case with NPM, better regulation is described as expert formulated, apolitical and without ideological connotations. But the main traits of NPM: transparency, accountability and customer orientation also meant more of cost-efficiency and market orientation, and few today would consider public sector market orientation, competition and privatisation to be politically and ideologically neutral (Hood and Jackson 1991; Boston et al 1996). In addition, the NPM trend was more driven on agendas, guidelines and programmes and less on evidence of the effects of the NPM reforms (Sahlin-Andersson 2000:7). If this is a characteristic valid also for the better regulation trend is still best left unsaid.

### **This is the way that Sweden has chosen, this far, and why - and at least one suggestion on how to improve the Swedish case**

Presenting RIA strategies, as Sweden does, is one thing, but to practise it something else. Swedish better regulation policy mainly focuses on objectives as simplification and to cut administrative burdens (Radaelli 2007:30). And there could of course be still an argument or two about definitions of what a national RIA strategy actually is. But what are the mimics and the ignorance of Sweden? Being short to too short on this issue, leaning heavily on other researchers and own impressions collected while approaching responsible governmental administrators, the Swedish attitude to RIA could be described as lukewarm. Although politicians every now and then speak of the importance of addressing consequences when drafting laws, there is little to no interest when the results of these assessments are presented, if they ever are.

'There is not much evidence on the use of RIA for purposes of political control in Denmark and Sweden. Our Swedish respondents think that RIA has provided 'yet another tick-the-box exercise in rule-formulation' (...) When shown other statements on the functions

of RIA, the Swedish interviewees (...) *do not think that RIA has increased political control of the Prime Minister or the core executive (...) has been used by different administrations to steer regulatory reform in one direction or another (...) has enhanced coordination at the level of social partners (...) or has given the citizens a say in the regulatory process*' (Radaelli 2007:28, my italics).

Sweden chooses to imitate the easiest things to imitate, that is the programmes and strategies, but not the rest. How then, if these findings are valid, should they be explained? Starting with the *constitutional arrangements* and *administrative systems*, there is due to the dualist model of Swedish government not possible for a minister to 'hands on'-interfere with the affairs of the agencies' and authorities'. As the overwhelming majority of the RIAs produced in Sweden have agencies as their performers, you rarely see any political interest in the substance or quality of these.

The Swedish system for decision-making and the results of parliamentary committees, described above, is already seen as giant impact assessments, and therefore committees see no reason to perform yet another assessment, or even summarise the one that is done. Sweden is half-heartedly struggling to fit the better regulation standards into the existing system. Although with a higher frequency of *changing political majorities* than before, the Swedish parliamentary system seldom or never gives rise to a clear majority, not without coalitions between three or more political parties, and politics is therefore always about negotiation. Even the most exquisite impact assessment, or a three year-Inquiry for that matter, can turn obsolete when a political party in the final stage of political co-ordinations is asking for another solution, not assessed but never the less agreed upon, as a part of the bargain game.

For Sweden, we should not underestimate the worries of 'Trojan Horses', where new 'innocent' techniques also bring more comprehensive shifts in values, norms and politics, but where these consequences are not discovered until later. Regarding *reform traditions* and *cultures* there is in Sweden none or very few strong governmental top civil servants that can pursue reforms of this scale. The one principal explanation behind the scant results, I would say, is that the key players for successful implementation of reforms or new standards - the politicians - do hardly ever partake, not after the initial programme presentation and press conference. If the political power is to be used effectively and successful in reforms as better regulation, in my view, there must not be any doubts of the political ambitions. If the political reformers hesitate, are indistinct or only pay intermittent attention, then other governmental levels chooses to give priority to something completely different. Also, when the implementation is handed over from the politicians to organisational 'weak' administrators, as is often the case, we can expect the processes to reward actors with other priorities than reforms on their agenda (Erlandsson 2007).

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