

**The Implementation Council**

KN 2024:04

Ministry of Climate and  
Enterprise,  
Miljöprövningsenheten (KN  
Me), Enheten för cirkulär  
ekonomi, kemikalier och  
strålning (KN CKS),  
Naturmiljöenheten (KN NM)

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**Addendum to the Implementation Council's previous  
statement for Sweden's position ahead of EU negotiations –  
proposal for the Environmental Omnibus**

This addendum to the Implementation Council's previous statement on the environmental omnibus specifically refers to the recommendation that the government should support the Commission's proposal to abolish the SCIP database.

The addendum presents calculations that indicates that the reporting requirements to the SCIP database has a negative impact on the value added of affected Swedish industry branches and can be seen as an indication of a negative impact on Swedish competitiveness.

The administrative costs can be estimated at a range of SEK 11–59 million per year for SNI27, SEK 37–187 million per year for SNI 28, SEK 12–63 million per year for SNI29 and SEK 9–48 million per year for SNI30.

The negative impact on competitiveness through changes in value added can be estimated at a range of SEK 12–61 million per year for SNI27, SEK 50–253 million per year for SNI28, SEK 12–62 million per year for SNI29 and SEK 10–53 million per year for SNI30. Abolishing the SCIP database would thus have resulted in significant cost savings for Swedish businesses.

## The Implementation Council's calculation basis regarding businesses' costs for reporting to the SCIP database

The Implementation Council's view is that there is a wide consensus regarding the abolition of the SCIP database. The following calculations therefore aim to illustrate the administrative cost savings that could be achieved through the abolition of the database, as well as to indicate the negative impact on competitiveness that SCIP entails for the affected branches of Swedish industry.

Together with Jönköping International Business School and the Swedish Agency for Economic and Regional Growth, we have developed a calculation procedure for regulatory costs for businesses at SNI2 level.<sup>1</sup> This approach goes beyond the current focus on administrative costs, it also captures the impact at an aggregate level such as value added/GDP.<sup>2</sup> The procedure is rooted in the growth accounting methodology and the calculations themselves are based on a macroeconomic exogenous growth model. Our approach can also incorporate elements where administrative cost is calculated (a simplified standard cost version). We then apply a simple and approximate view of the concept of competitiveness where the impact on value added is seen as an indicative value to capture what the impact is on Swedish competitiveness for the affected industry.<sup>3</sup>

### Affected industries and businesses

The obligation to report to the SCIP database applies to businesses that produce, assemble, import or distribute articles containing substances of very high concern (SVHCs<sup>4</sup>), which contain a concentration exceeding 0.1% by weight (calculated on each component of a complex article).

In producing this calculation basis, the Council has used information received in contacts with the Technology Industries of Sweden.<sup>5</sup> According

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<sup>1</sup> SNI codes are Swedish standard industrial classification (connected to the European NACE system) which is used to categorize companies by their economic activity, see more information, <https://www.scb.se/en/documentation/classifications-and-standards/swedish-standard-industrial-classification-sni/>

<sup>2</sup> Our calculations are based on estimates that are from the 2022 data

<sup>3</sup> For more information about our calculation model, see <https://implementeringsradet.se/vart-arbete/#berakningsmodell>.

<sup>4</sup> SVHC is an abbreviation for Substances of Very High Concern. The substances are identified and listed in the Candidate List according to the REACH Regulation.

<sup>5</sup> This is a Swedish trade association for mainly tech, engineering or technology businesses

to the information provided, the sectors primarily affected in its entirety are SNI27–SNI30, i.e. the manufacture of electrical equipment (SNI27), the manufacture of other machinery (SNI28), the manufacture of motor vehicles, trailers and semi-trailers (SNI29), and the manufacture of other means of transport (SNI30).<sup>6</sup>

### **Consequences for Swedish businesses**

To carry out the calculations, the Technology Industries of Sweden has presented three examples of companies that report to the SCIP database.

For *Company 1*, with 100-150 employees, the reporting requirements to SCIP meant that the company needed to develop a software interface between its ERP system and the SCIP database, an effort that required about 480 working hours from the internal IT department, where 1,200 articles were also reported. In addition, about 80 hours were required to adapt the ERP system so that articles with SVHC substances could be correctly flagged. In ongoing operations, each report takes about 20 minutes per article, and so far, around 300 articles have been reported.

For *Company 2*, with approximately 10,000 employees in Sweden, SCIP reporting accounts for an estimated 2–5 percent of the company's total costs for environmental regulatory compliance, while the parallel information obligation represents approximately 30 percent. For SCIP, the initial cost is approximately SEK 8 million, mainly associated with the implementation of IT tools, while the annual operational work corresponds to approximately 2,000 working hours.

*Company 3*, with approximately 4,000 employees in Sweden, contracts Assent<sup>7</sup> to carry out the SCIP reporting. The internal preparatory work also consists of detailed reviews of bills of material (BOM)<sup>8</sup>, collection and follow-up of supplier declarations and supplementary searches for documentation for catalogue components. In total, the company estimates

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<sup>6</sup> SNI26, SNI32 and SNI46 are also affected, but not in their entirety.

<sup>7</sup> Assent is a company, [www.assent.com](http://www.assent.com), that provides IT tools and services for environmental/sustainability reporting, among other things.

<sup>8</sup> BOM is an abbreviation for Bill of Materials.

that work related to SVHC, REACH and SCIP issues corresponds to approximately one full-time position.<sup>9</sup>

## Calculation basis

### *Our assumptions*

We perform calculations for the SNI codes that, according to the Technology Industries of Sweden, are affected in their entirety at SNI2 level. As mentioned above, this applies to SNI27–SNI30.

The information received from the Technology Industries of Sweden shows that some larger companies, with more than 250 employees, as well as medium-sized companies with 100–250 employees, spend around 2,000 hours per year on reporting to SCIP. However, companies of this size are not representative for the four SNI codes, as around half of the businesses in these sectors are micro-enterprises with 1–9 employees. We therefore assume, based on the sector composition, these businesses on average handle significantly fewer articles and consequently spend less time reporting than larger companies.

To reflect this variation across businesses, we have chosen to use an indicative range of 40–200 hours per year in the calculations. The range makes it possible to capture both those businesses that have very limited reporting needs and those that, despite their smaller size, may have somewhat more complex product flows. Also, an interval is more methodologically reasonable than a single figure and provides a more realistic representation of actual conditions in the sector.

Based on information received from the Technology Industries of Sweden, the Council assume that individuals that carry out SCIP registrations are employed as environment engineers, occupational and environmental hygienists and/or system administrators according to classifications from Statistics Sweden (SCB).<sup>10</sup> The average salary for these roles is approximately SEK 50,000 per month. Based on the Swedish Agency for Economic and Regional Growth's calculations, we also assume that a person

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<sup>9</sup> The Council assumes that this corresponds to 1,808 hours in line with the Swedish Agency for Economic and Regional Growth's recommendation, see page 15 of <https://tillvaxtverket.se/download/18.10ba1f0019c2cb84622bdcc2/1770729090979/Ber%C3%A4kningsguide%202026.pdf>

<sup>10</sup> See [Salary statistics – How much does ...?](#)

works an average of 1,808 hours per year.<sup>11</sup> These assumptions form the basis for carrying out the cost calculations presented below.

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<sup>11</sup> See page 15,  
<https://tillvaxtverket.se/download/18.10ba1f0019c2cb84622bdec2/1770729090979/Ber%C3%A4kningsguide%202026.pdf>

Table 1. Industry information and calculation results

Industry	Manufacture of electrical equipment (SNI27)	Manufacture of other machinery and equipment (SNI28)	Manufacture of motor vehicles, trailers and semi-trailers (SNI29)	Manufacture of other transport equipment (SNI30)
<b>Total number of businesses</b>	525	1 644	558	422
<b>Total number of employees</b>	23 634	70 017	73 132	19 738
<b>Calculation results:</b>				
<b>Impact (hours on an annual basis)</b>	40h–200h	40h–200h	40h–200h	40h–200h
<b>Administrative cost</b>	11–59 MSEK	37–187 MSEK	12–63 MSEK	9–48 MSEK
<b>Impact on competition through changes in value added</b>	(-12) – (-61) MSEK	(-50) – (-253) MSEK	(-12) – (-62) MSEK	(-10) – (-53) MSEK

#### *Manufacture of electrical equipment (SNI27)*

Based on the information presented in Table 1 and our assumptions, for SNI27 the administrative costs can be estimated to be within a range of approximately SEK 11–59 million per year if all companies in the industry spend 40–200 hours on reporting to the SCIP database.

The negative impact on competitiveness through changes in value added for companies within SNI27 can be estimated to be within a range of approximately SEK 12–61 million per year if all companies in the industry spend 40–200 hours on reporting to the SCIP database.

*Manufacture of other machinery and equipment (SNI28)*

Based on the information presented in Table 1 and our assumptions, for SNI28 the administrative costs can be estimated to be within a range of approximately SEK 37–187 million per year if all companies in the industry spend 40–200 hours on reporting to the SCIP database.

The negative impact on competitiveness through changes in value added for companies within SNI28 can be estimated to be within a range of approximately SEK 50–253 million per year if all companies in the industry spend 40–200 hours on reporting to the SCIP database.

*Manufacture of motor vehicles, trailers and semi-trailers (SNI29)*

Based on the information presented in Table 1 and our assumptions, for SNI29 the administrative costs can be estimated to be within a range of approximately SEK 12–63 million per year if all companies in the industry spend 40–200 hours on reporting to the SCIP database.

The negative competitiveness impact through changes in value added for companies within SNI29 can be estimated to be within a range of approximately SEK 12–62 million per year if all companies in the industry spend 40–200 hours on reporting to the SCIP database.

*Manufacture of other transport equipment (SNI30)*

Based on the information presented in Table 1 and our assumptions, for SNI30 the administrative costs can be estimated to be within a range of approximately SEK 9–48 million per year if all companies in the industry spend 40–200 hours on reporting to the SCIP database.

The negative competitiveness impact through changes in value added for companies within SNI30 can be estimated to be within a range of approximately SEK 10–53 million per year if all companies in the industry spend 40–200 hours on reporting to the SCIP database.

Finally, the Implementation Council would like to emphasise that the calculations presented above only includes four examples of the consequences that the reporting requirements to the SCIP database may entail for businesses concerned. The total impacts for all affected businesses have not been calculated in this statement. The estimated costs presented in the table above represent a relatively wide range, where the actual costs are likely to be somewhere between the stated endpoints.

However, the examples indicate an indicative negative impact on Swedish competitiveness as well as significant administrative costs for businesses because of the reporting requirements to the SCIP database. In the Council's previous contacts with industry associations, businesses have also emphasised that the reporting requirements entail double reporting without corresponding environmental benefits being demonstrated.

Abolishing the SCIP database would therefore result in reduced double reporting as well as cost and time savings for businesses. The Implementation Council hopes that this calculation basis can contribute to strengthening the Government's negotiating basis in the continued EU-negotiation by providing a more concrete picture of the administrative burden that businesses face, as well as the potential savings that an abolition of the SCIP database could entail.

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Decided by the Implementation Council on 23 April 2026