

President von Der Leyen
European Commission

Stockholm 22 October 2021

Comments on the delegated regulation on establishing a Recovery and Resilience Facility (RRF) Scoreboard

Dear President von Der Leyen,

Following our letter to you, and the response from your colleague, Ms Céline Gauers, of 19 April this year concerning the importance of the RRF Scoreboard, the Confederation of Swedish Enterprise would like to offer some comments on the delegated regulation that was presented on the 28 September 2021 on establishing a Recovery and Resilience Facility (RRF) Scoreboard.

In our most recent letter, we included a proposal for the European Recovery Scoreboard, which had been produced in close collaboration between the Nordic-Baltic Business Community. The Confederation of Swedish Enterprise has now, along with our sister organisations in Denmark and Finland, compared the European Commission's drafted Act with our suggestion for a European Recovery Scoreboard. We therefore enclose our more detailed comments with this letter.

First, we fully support, and stress the value of, a scoreboard that provides transparent and concise information on the progress of implementing the recovery and resilience plans. We also emphasise the importance of such a scoreboard being easily and publicly available. Even if all effects and outcomes cannot be measured in the short term, they are still important to measure so that we can learn lessons from what works and what does not and thus improve the restructuring processes and facilitate benchmarking. We are well aware of the challenge of creating measurability and to choose the most relevant indicators, but even so there is no reason not to make every effort to measure and to develop measurements for outcome results rather than focusing on input measures.

Overall, we would first like to stress that the scoreboard – in addition to describing how the various Member States are progressing towards their milestones and goals – must always keep the EU's international competitiveness in mind. It is therefore problematic that – according to the draft – there is no indicator focusing on business investment and productivity, nor one on intellectual property or on the use of AI.

We also believe that the scoreboard should enable benchmarking between countries, not simply on how a number of target variables are being affected but also the type of programmes and reforms that have had the greatest impact. Currently, the focus is entirely on how the objectives have been achieved rather than on the effectiveness of various measures. This is a serious shortcoming, and one that complicates benchmarking and learning between countries. It also risks leading to the deployment of ineffective measures

for achieving the goals – pursuing short-term actions rather than the required long-term reforms.

Therefore, we recommend increasing the granularity of the indicators proposed and having a greater focus on the restructuring of the economy via investments and entrepreneurship. Recovery plans include a wide range of investments and reforms with an equally wide range of objectives, yet we believe the current indicators fail to provide a thorough and sufficiently comprehensive assessment of the corresponding effect, in particular for those related to the restructuring of the economy and the business sector. Indicators on the restructuring of the economy (not least for assessing competitiveness) would probably be more valuable than measuring the number of modernised childcare facilities.

I hope we can continue our dialogue on this unique opportunity to restart economic growth following the coronavirus crisis. Used in the correct way, the EU's Recovery and Resilience Facility will help strengthen European competitiveness and ensure sustainable growth and job creation by accelerating necessary green and digital transitions.

Best regards

Jan-Olof Jacke, Director General

