23 July 2026

Positive preliminary assessment of the satisfactory fulfilment of milestones and targets related to the second payment request submitted by Sweden on 23 January 2026, transmitted to the Economic and Financial Committee by the European Commission

Executive summary

In accordance with Article 24(2) of Regulation (EU) 2021/241, on 23 January 2026, Sweden submitted a request for payment for the third and fourth instalments of the non-repayable support. The payment request was accompanied by the required management declaration and summary of audits.

To support its payment request, Sweden provided due justification of the satisfactory fulfilment of the 10 milestones and targets of the third instalment of the non-repayable support and the 6 milestones and targets of the fourth instalment of the non-repayable support, as set out in Section 2 of the Council Implementing Decision of 4 May 2022 on the approval of the assessment of the recovery and resilience plan for Sweden1.

For 4 targets covering a large number of beneficiaries, in addition to the summary documents and official listings provided by Sweden, Commission services have assessed a statistically significant sample of individual files. The sample size has been uniformly set at 60, which corresponds to a confidence level of 95% or above in all cases.

In its payment request, Sweden has confirmed that measures related to previously satisfactorily fulfilled milestones and targets have not been reversed. The Commission does not have evidence of the contrary. Upon receipt of the payment request, the Commission has assessed on a preliminary basis the satisfactory fulfilment of the relevant milestones and targets. Based on the information provided by Sweden, the Commission has made a positive preliminary assessment of the satisfactory fulfilment of all 16 milestones and targets.

The milestones and targets positively assessed as part of this payment request demonstrate significant steps in the implementation of Sweden's Recovery and Resilience Plan. They notably highlight the continuation of the reform momentum in key policy areas. This includes, among others, reforms that streamline the process for obtaining environmental permits, speed up the authorisation process for electricity grid construction, introduce a national professional programme in education and adjust age limits in social security and tax systems. The milestones and targets also confirm progress towards the completion of investment projects related to the reduction of carbon dioxide emissions at local and regional level, the protection of valuable nature, the increase in housing supply and the creation of additional capacity in higher education.

By the transmission of this positive preliminary assessment and in accordance with Article 24(4) of Regulation (EU) 2021/241, the Commission asks for the opinion of the Economic and Financial Committee on the satisfactory fulfilment of the relevant milestones and targets.

1 ST 7772/22 INIT and ST 7772/22 ADD 1, as amended by ST 14474/23 INIT and ST 14474/23 ADD 1, ST 15975/24 INIT and ST 15975/24 ADD 1, and ST 17028/25 INIT and ST 17028/25 ADD 1

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Preliminary Assessment – M/T specific section:

Non-repayable support

Number and name of the Target: 4 – T4: Award of projects reducing carbon dioxide emissions by expected 245 000 tonnes

Related Measure: A.I1 Local and regional climate investments

Quantitative Indicator: New CO2 or CO2 equivalent reductions in emissions

Baseline: 540 000

Target: 785 000

Time: Q4 2025

1. Context:

The objective of the investment is to reduce carbon dioxide and other greenhouse gas emissions, by financing local and regional emission reducing projects.

Target 4 refers to the award of projects that in total are expected to reduce carbon dioxide emissions by an additional 245 000 metric tonnes.

Target 4 is the third and last target of the investment, and it follows the completion of target 1 and target 2, also concerning reduction of carbon dioxide emissions.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document.	Summary document duly justifying how the target (including all the constitutive elements of the target) was satisfactorily fulfilled.
2	Document by the Swedish Environmental Protection Agency listing the supported projects in 2023, 2024 and 2025 by the Climate Leap.	The list contains projects supported by the Climate Leap in 2023, 2024 and 2025 including information such as the emission reductions the projects yield, its name and the entity receiving support. The list of all projects supported by the Climate Leap for 2023-2025 and awarded amount is also publicly available here: https://www.naturvardsverket.se/amnesomraden/klimatomstallningen/klimatklivet/sa-fungerar-klimatklivet/resultat--hur-har-det-gatt-for-klimatklivet/#:~:text=Till%20och%20med%2031%20december%202024%20har%20Klimatklivet,byte%20till%20fossilfria%20br%C3%A4nslen%20genom%20energikonvertering%20och%20laddstationer
3	Ordinance on support for local climate investments, no. SFS 2015:517, published on 25 June 2015 in the Swedish Code of Statutes, entered into force on	The ordinance, adopted by the Swedish Government, establishes the support scheme for the Climate Leap. The ordinance is also available here: https://www.riksdagen.se/sv/dokument-och-lagar/dokument/svensk-forfattningssamling/forordning-

	15 July 2015.	2015517-om-stod-till-lokala_sfs-2015-517/
4	Binding document, by the Swedish Environmental Protection Agency with binding instructions on the eligibility criteria applied for projects under the Climate Leap.	The document contains the Swedish Environmental Protection Agency's binding eligibility criteria applied for the projects under the Climate Leap.
5	Methodology by the Swedish Environmental Protection Agency for the calculation of the emission reductions and their compliance with the eligibility criteria for the Climate Leap.	The document contains the methodology for calculating the emission reductions for the different type of projects supported by the Climate Leap. It further contains the methodology for establishing that the projects comply with the eligibility criteria pertaining to specific type of projects.
7	Template opinion from the Country Administrative Boards.	The template opinion is submitted for each project by the County Administrative Board in the county the project takes place to the Swedish Environmental Protection Agency. It contains an assessment of the projects' compliance with the eligibility criteria under the Climate Leap pertaining mainly to the principle of do no significant harm (DNSH).
8	Guidance by the County Administrative boards on the eligibility criteria for the Climate Leap.	The internal guidance describes the eligibility criteria for the Climate Leap pertaining mainly to the principle of DNSH to facilitate the internal assessment of projects under the Climate Leap.
9	Estimated lifetime of projects under the Climate Leap by the Swedish Environmental Protection Agency dated 24 May 2024.	The document lists the estimated lifetime of projects that may be supported under the Climate Leap, such as charging infrastructure and energy conversion.
10	Analysis by the Swedish Energy Agency of 28 February 2017 of the emission reductions achieved from charging infrastructure/stations.	The paper analyses the emission reductions from charging stations, including their expected lifetime. The analysis is relevant to demonstrate the expected lifetime of projects under the Climate Leap concerning charging infrastructure/stations.
11	Documents by the Swedish Environmental Protection Agency containing a calculation and an explanation of the potential CO2 or CO2 equivalent emission reductions by projects awarded.	In the context of the sampling analysis, and for the further verification of the target, these supporting documents were provided for the list of 60 sampled units.
12	Administrative certificates by the Swedish Environmental Protection Agency demonstrating that the projects awarded do not support DNSH non-compliant activities.	In the context of the sampling analysis, and for the further verification of the target, these supporting documents were provided for the list of 60 sampled units.
13	Award decision by the Swedish Environmental Protection Agency demonstrating that a project has been awarded	In the context of the sampling analysis, and for the further verification of the target, these supporting documents were provided for the list of 60 sampled units.

	support under the Climate Leap.	

3. Analysis:

The justification and substantiating evidence provided by the Swedish authorities cover all constitutive elements of the target.

Awarded projects that shall be in line with the criteria set out in the description of the measure.

The measure description requires that **the Climate Leap shall provide financing to the investments with the largest possible GHG emission reduction per SEK invested.**

The Climate Leap is an investment scheme which aims to finance local and regional activities to reduce emissions of carbon dioxide and other gases affecting the climate. The Climate Leap is established by the Ordinance on support for local climate investments, no. SFS 2015:517 (with later amendments), published in the Swedish Code of Statutes on 25 June 2015, after which it entered into force on 15 July 2015 (evidence 3, *hereinafter referred to as the "Climate Leap Ordinance*").

According to article 4 of the Climate Leap Ordinance, financial support under the Climate Leap is given to activities that yield the largest emission reductions of CO2e per SEK supported.

The measure description further requires that:

- **For projects on the conversion to bioenergy for heating in industry and agriculture, the measure shall reduce GHG emissions by at least 80% through the use of biomass based on the calculation method for greenhouse gas reductions and the relative fossil equivalent set out in Annex VI to Directive (EU) 2018/2001.**
- **For projects on the production of biogas, the measure shall reduce greenhouse gas emissions on the installation by at least 65% through the use of biomass to this end based on the calculation method for greenhouse gas reductions and the fossil equivalent set out in Annex V to the Directive (EU) 2018/2001.**
- **For projects on waste (plastic recycling), the measure shall convert at least 50%, measured by weight, of the processed and separately collected harmless waste into secondary raw materials.**
- **For projects on energy efficiency, the measure shall achieve, on average, a minimum 30% reduction in direct and indirect greenhouse gas emissions compared to pre-calculated emissions.**

To demonstrate that the awarded projects are in line with these four criteria, the Swedish authorities submitted as evidence a binding document by the Swedish Environmental Protection Agency (evidence 4, *hereinafter referred to as the "binding document")* which specifies the eligibility criteria applicable for receiving support from the Climate Leap. The document is an internally binding instruction to which the Swedish Environmental Protection is bound in its awarding of projects under the Climate Leap. It is therefore comparable to an administrative regulation with binding legal character for the Swedish Environmental Protection Agency.

The requirements pertaining to the four criteria; bioenergy for heating in industry and agriculture, production of biogas, waste (plastic recycling) and energy efficiency, are all specified as eligibility criteria in the binding document on page 4.

In addition, the Swedish authorities also submitted the methodology used by the Swedish Environmental Protection Agency to verify each of the projects' compliance with the criteria (evidence 5). The methodology describes how the criteria above are calculated for each project. Each project's compliance with these four criteria is also part of the sampling, as described further below.

To comply with the principle of "Do No Significant Harm" (DNSH), the measure description requires that projects on **biofuels shall meet the sustainability and greenhouse gas emission savings criteria set out in Articles 29, 30 and 31 of the Renewable Energy Directive 2018/2001/EU (REDII) and the rules on food and feed based biofuels set out in Article 26 of that Directive, and the related implementing and delegated acts adopted in accordance with that Directive.**

According to section 6c of the Climate Leap Ordinance (evidence 3), only projects that comply with the abovementioned requirement can receive support from the Climate Leap. The exclusion of support to projects that do not fulfil this requirement is also specified on page 4 of the binding document (evidence 4).

Compliance with the requirement is also ensured by the County Administrative Boards, as according to section 11 of the Climate Leap Ordinance (evidence 3), applications for support are submitted to the County Administrative Board in the county the project is carried out. The Country Administrative Board assesses each application before forwarding it to the Swedish Environmental Agency together with its opinion on the project's eligibility for support. According to section 16 of the Climate Leap Ordinance, the Swedish Environmental Agency reviews the application and opinion from the County Administrative Board, before it renders a decision on support from the Climate Leap. On page 1 of the template opinion issued by the County Administrative Boards to the Swedish Environmental Agency, the requirement for biofuels is specified (evidence 7*, hereinafter referred to as the County Administrative Boards' opinion)*. Moreover, the requirement is further detailed on page 2 of the guidance on the Climate Leap to the County Administrative Boards (evidence 8*, hereinafter referred to as the guidance document).* The projects' compliance with the principle of DNSH as specified in the measure description is also part of the sampling, as described further below.

Furthermore, the measure description requires that in order to comply with the DNSH principle, **activities under the Emissions Trading System shall not be eligible for funding, with the exception of waste heat that is used for district heating. Any such funding for waste heat shall have projected greenhouse gas emissions below the heat benchmark established in Commission Implementing Regulation (EU) 2021/447.**

According to section 6 (1) of the Climate Leap Ordinance (evidence 3), activities under the Emissions Trading System are not eligible for funding, with the exception of waste heat that is used for district heating. It is further described in section 6(2) that funding for waste heat must have projected greenhouse gas emissions below the heat benchmark established in the Commission Implementing Regulation (EU) 2021/447. The requirement is also specified on page 1 of the binding document (evidence 4), and compliance with the requirement is an integral part of the of the County Administrative Boards' opinion (page 3, evidence 7) and specified on page 4 of the guidance

document (evidence 8). The projects' compliance with this requirement is also part of the sampling, as described further below.

The measure description also requires that **as a whole, the following activities are further excluded from financing: (i) activities and assets related to fossil fuels, including downstream use; (ii) activities and assets related to waste landfills, incinerators and mechanical biological treatment plants and (iii) activities and assets where the long-term disposal of waste may cause harm to the environment.**

According to section 6d – 6e of the Climate Leap Ordinance (evidence 3), support to measures cannot be given to projects that fall under the exclusion list specified in the measure description, which pertains to (i) activities and assets related to fossil fuels, including downstream use, (ii) activities and assets related to waste landfills, incinerators and mechanical biological treatment plants and (iii) activities and assets where the long-term disposal of waste may cause harm to the environment. The requirement is also set out on page 1 of the binding document (evidence 4), and compliance with the requirement is an integral part of the County Administrative Boards' opinion (page 4, evidence 7). Moreover, page 6 of the guidance document (evidence 8) also specifies that projects that fall under the exclusion list are excluded from being eligible for support. The projects' compliance with this requirement is also part of the sampling, as described further below.

[Awarded projects] **that shall in total decrease carbon dioxide emissions by an additional 245 000 tonnes per year over an expected period of 16 years.**

The yearly carbon dioxide emission reductions per project are listed in column H of the list of supported projects (evidence 2). In total, the awarded projects will lead to an annual decrease of carbon dioxide emissions amounting to 704 250 metric tonnes (rounded), according to the list of supported projects. The average technical lifetime of the projects is 15.3 years, according to column I of the list of supported projects. In total, the emission reductions delivered over a period of 15.3 years amount to 10 777 837 metric tonnes of reductions (704 249.665 metric tonnes x 15.304 years). This is more than the total emission reductions that would have been delivered, had it been 245 000 metric tonnes per year over an expected period of 16 years, as this would amount to 3 920 000 metric tonnes of reductions (245 000 metric tonnes x 16 years).

Following the selection of a random sample of 60 units, Sweden submitted for each unit a document containing a calculation and an explanation of the carbon dioxide (or equivalents) emission reductions achieved by the project (evidence 11). The evidence provided for a sample of 60 units confirmed that the requirement of the target for the reduction of carbon dioxide emission reductions, including the reductions requirements stipulated for certain categories of projects, has been met. The calculation and explanation also confirmed the expected average lifetime of 15.3 years of the projects. While this is below the expected period of 16 years, the target exceeds the goal of Target 4 by 6 857 837 metric tonnes in total, as described above (10 777 837 - 3 920 000). For projects concerning charging stations, the expected lifetime was demonstrated horizontally by the Swedish Environmental Protection Agency's guidance on the estimated lifetime for projects under the Climate Leap (evidence 9) and the analysis by the Swedish Energy Agency of emission reductions achieved from charging infrastructure, thereby also analysing their estimated lifetime (evidence 10).

Sweden also submitted as part of the sampling award decisions under the Climate Leap by the Swedish Environmental Protection Agency (evidence 13). This demonstrated the requirement in the Council Implementing Decision pertaining to the award of projects.

Sweden also submitted as part of the sampling administrative certificates from the Swedish Environmental Protection Agency (evidence 12) as per the further specifications of the Operational Arrangements between Sweden and the European Commission to demonstrate that the projects do not support DNSH non-compliant activities.

The evidence provided for a sample of 60 units confirmed that the requirements of the target have been met, because the sampled projects confirmed the emission reductions delivered by the project, including the specific requirements for certain categories of projects. It was furthermore confirmed that the projects have been awarded and that they did not support DNSH non-compliant activities.

The Commission services conducted an on-the-spot check on 19 February 2026 to verify the alignment of screenshots submitted for 14 units, to demonstrate the emission reductions and lifetime of the project (evidence 11), with data from the case management system used for the Climate Leap. This check was completed successfully, confirming that information shown on the screenshots matched with the emission reductions indicated for these projects in the list of projects (evidence 2).

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Preliminary Assessment – M/T specific section:

Non-repayable support

Number and name of the Milestone: 11 – Entry into force of legislation to streamline the process for obtaining environmental permits

Related Measure: A.R1 Streamline the process for environmental permits

Qualitative Indicator: Provisions in the legislation to streamline the process for obtaining environmental permits, and their entry into force.

Time: Q1 2025

1. Context:

The objective of this reform is to streamline the procedures for obtaining or extending environmental permits.

Milestone 11 concerns the entry into force of legislation to streamline the process for environmental permits.

Milestone 11 is the only milestone of this measure.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document.	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactory fulfilled.
2	Proposal for a step towards a more efficient environmental assessment, no. 2023/24:152, dated 23 May 2024, published on the Government's website on 28 May 2024.	This document details the proposed legislative amendments to the Environmental Code and sectoral legislation as compared to the original laws. The amendments in the proposal correspond to those in the adopted Act amending the Environmental Code (evidence 3) and acts amending sectoral legislation (evidence 4-12). The document is a legal source for interpretation of the acts. Publicly accessible at: https://www.regeringen.se/rattsliga-dokument/proposition/2024/05/prop.-202324152
3	Act amending the Environmental Code, no. SFS 2024:963, issued on 31 October 2024, published in the Swedish Code of Statues on 5 November 2024, entered into force on 1 January 2025.	The Act is adopted by the Swedish Parliament (*Riksdagen*).
4	Act amending the Continental Shelf Act (1966:314), no. SFS 2024:964, issued on 31 October 2024, published in the Swedish Code of Statues on 5 November	The Act is adopted by the Swedish Parliament (*Riksdagen*).

	2024, entered into force on 1 January 2025.	
5	Act amending the Act (1978:160) on certain pipelines, no. SFS 2024:965, issued on 31 October 2024, published in the Swedish Code of Statues on 5 November 2024, entered into force on 1 January 2025.	The Act is adopted by the Swedish Parliament (*Riksdagen*).
6	Act amending the Act (1983:293) on the establishment, extension and cancellation of public fairways and public ports, no. SFS 2024:966, issued on 31 October 2024, published in the Swedish Code of Statues on 5 November 2024, entered into force on 1 January 2025.	The Act is adopted by the Swedish Parliament (*Riksdagen*).
7	Act amending the Act (1984:3) on nuclear activities, no. SFS 2024:967, issued on 31 October 2024, published in the Swedish Code of Statues on 5 November 2024, entered into force on 1 January 2025.	The Act is adopted by the Swedish Parliament (*Riksdagen*).
8	Act amending the Swedish Economic Zone Act (1992:1140), no. SFS 2024:968, issued on 31 October 2024, published in the Swedish Code of Statues on 5 November 2024, entered into force on 1 January 2025.	The Act is adopted by the Swedish Parliament (*Riksdagen*).
9	Act amending the Electricity Act (1997:857), no. SFS 2024:969, issued on 31 October 2024, published in the Swedish Code of Statues on 5 November 2024, entered into force on 1 January 2025.	The Act is adopted by the Swedish Parliament (*Riksdagen*).
10	Act amending the Act (1998:812) with special provisions on water activities, no. SFS 2024:970, issued on 31 October 2024, published in the Swedish Code of Statues on 5 November 2024, entered into force on 1 January 2025.	The Act is adopted by the Swedish Parliament (*Riksdagen*).
11	Act amending the Natural Gas Act (2005:403), no. SFS 2024:971, issued on 31 October 2024, published in the Swedish	The Act is adopted by the Swedish Parliament (*Riksdagen*).

	Code of Statues on 5 November 2024, entered into force on 1 January 2025.	
12	Act amending the Land and Environment Courts Act (2010:921), no. SFS 2024:972, issued on 31 October 2024, published in the Swedish Code of Statues on 5 November 2024, entered into force on 1 January 2025.	The Act is adopted by the Swedish Parliament (*Riksdagen*).

3. Analysis:

The justification and substantiating evidence provided by the Swedish authorities cover all constitutive elements of the milestone.

Entry into force of legislation

Footnote 1 on page 10 of the Act amending the Environmental Code, no. SFS 2024:963 (evidence 3, *hereinafter referred to as the "Act amending the Environmental Code"*), specifies that the act entered into force on 1 January 2025.

Pages 1-2 of the following acts amending sectoral legislation (evidence 4-12), as referred to in the Proposal for a step towards a more efficient environmental assessment, no. 2023/24:152 (evidence 2, *hereinafter referred to as the "Proposal"*), specify that the acts entered into force on 1 January 2025:

- Act amending the Continental Shelf Act (1966:314), no. SFS 2024:964;
- Act amending the Act (1978:160) on certain pipelines, no. SFS 2024:965;
- Act amending the Act (1983:293) on the establishment, extension and cancellation of public fairways and public ports, no. SFS 2024:966;
- Act amending the Act (1984:3) on nuclear activities, no. SFS 2024:967;
- Act amending the Swedish Economic Zone Act (1992:1140), no. SFS 2024:968*;*
- Act amending the Electricity Act (1997:857), no. SFS 2024:969;
- Act amending the Act (1998:812) with special provisions on water activities, no. SFS 2024:970;
- Act amending the Natural Gas Act (2005:403), no. SFS 2024:971; and
- Act amending the Land and Environment Courts Act (2010:921), no. SFS 2024:972.

[Entry into force of legislation] **that shall:**

a) simplify procedures for obtaining a permit for activities having an insignificant impact on the environment;

The Act amending the Environmental Code (evidence 3) amends Chapter 6, Articles 26 and 47 of the Environmental Code, clarifying that, if the county administrative board decides that a significant environmental impact of an activity cannot be assumed, the party intending to carry out the activity

is to provide simplified documentation. This change clarifies that the documentation to be provided in the context of an environmental assessment in such cases should be less extensive than when an activity is assumed to have a significant environmental impact, which requires a specific environmental impact assessment, as described on page 54 of the Proposal (evidence 2). As further described on page 54 of the Proposal, the difference in the required documentation depending on the environmental impact of the activity had previously not been sufficiently clear, leading to unnecessary procedures. Where relevant, the acts amending sectoral legislation (evidence 4-9 and 11) also establish that simplified documentation is to be provided if a significant environmental impact cannot be assumed, in line with the amendments to the Environmental Code. As such, the legislation simplifies the procedures for obtaining a permit for activities having an insignificant impact on the environment, clarifying that the documentation to be provided should be less extensive.

b) harmonise criteria to assess whether an environmental permit is required;

The Act amending the Environmental Code (evidence 3) amends Chapter 9, Article 6a of the Environmental Code, establishing that, even if a permit obligation does not follow from regulations, the supervisory authority may order the operator of an activity to apply for a permit if the activity can be assumed to have a significant environmental impact. This entails a change to the concept of the impact of the activity, aligning it with the wording used under Chapter 6 of the Environmental Code on environmental assessments and in the sectoral legislation, creating uniformity among concepts regulating when a permit obligation may arise for environmentally hazardous activities, as described on pages 51-52 of the Proposal (evidence 2). As further described on pages 51-52 of the Proposal, different concepts were previously used to regulate when permits may be required for environmentally hazardous activities, creating a need to simplify regulations. As such, the legislation harmonises criteria to assess whether an environmental permit is required, establishing fewer and more uniform concepts.

c) streamline the role of administrative authorities in the process of obtaining an environmental permit to avoid overlaps between administrative authorities' responsibilities;

The Act amending the Environmental Code (evidence 3) amends Chapter 22, Article 6 of the Environmental Code, removing the Legal, Financial and Administrative Services Agency *(Kammarkollegiet)* from the list of authorities which act as parties representing environmental and public interests during environmental assessment processes. This avoids overlaps of responsibility between the Legal, Financial and Administrative Services Authority and the Swedish Agency for Marine and Water Management and Swedish Environmental Protection Agency, both of which already monitor the same interests as the removed authority, as described on pages 75-76 of the Proposal (evidence 2). As such, the legislation streamlines the role of administrative authorities in the process of obtaining an environmental permit to avoid overlaps between the authorities' responsibilities, allowing for a simplified environmental assessment process with less involved actors.

d) enable digital processes of applying for an environmental permit;

The Act amending the Environmental Code (evidence 3) amends Chapter 22, Articles 2 and 10 of the Environmental Code, adding that application files are to be submitted in the format specified by the Land and Environment Court. This allows the court as examining authority to choose an electronic

format which enables more standardised digital processes and facilitates making information digitally accessible, as described on pages 91, 113 and 116 of the Proposal (evidence 2). As such, the legislation enables digital processes to apply for an environmental permit.

e) introduce an environmental permit that covers only the change in the company's activities (ändringstillstånd), unless the permit is intended to cover all the company's activities, or if environmental considerations make this problematic;

The Act amending the Environmental Code (evidence 3) amends Chapter 16, Article 2a of the Environmental Code, establishing that in the event of a change to an environmentally hazardous activity, the permit must be limited to the change of the activity, a so-called permit for changes *(ändringstillstånd)*. The amendment also establishes that a permit for changes may not be granted if the application relates to a permit for the entire activity or if it is inappropriate for the permit to be limited solely to the change of the activity. A permit for changes can be considered inappropriate if the extent of the change is large or likely to have a significant or lasting adverse impact on the environment, as described on pages 108-109 of the Proposal (evidence 2). As such, the legislation introduces an environmental permit that covers only a change in the activity, unless the permit is intended to cover all the activity or if environmental considerations make this problematic.

f) enable an extension of a time limited environmental permit by maximum three years.

The Act amending the Environmental Code (evidence 3) amends Chapter 24, introducing Article 14a of the Environmental Code, establishing that, upon application by the permit holder, the licensing authority may, if appropriate with regard to the protection of human health and the environment, extend the validity of a permit in force at the time of the application for a period of up to three years, as described on pages 122-123 of the Proposal (evidence 2). As such, the legislation enables the extension of a time-limited environmental permit by maximum three years.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Preliminary Assessment – M/T specific section:

Non-repayable support

Number and name of the Target: 18 – Establishment or upgrade of nature reserves

Related Measure: A.I5 Protection of valuable nature

Quantitative Indicator: Number

Baseline: 0

Target: 270

Time: Q4 2023

1. Context:

The objective of this measure is to protect biodiversity in areas that host high natural values.

Target 18 requires at least 270 nature reserves to be established or upgraded.

Target 18 is the only target in this investment.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document.	Summary document justifying how the target (including all the constitutive elements) was satisfactorily fulfilled.
2	The Environmental Code (1998:808), no. SFS 1998:808, issued on 11 June 1998, entered into force on 1 January 1999.	The Environmental Code, adopted by the Swedish Parliament (*Riksdagen*), Chapter 7, sets out the legal framework for the establishment and modification of nature reserves in Sweden. Publicly accessible at: https://www.riksdagen.se/sv/dokument-och-lagar/dokument/svensk-forfattningssamling/miljobalk-1998808_sfs-1998-808/#K7
3	Ordinance (1998:1252) on area protection under the Environmental Code etc, no. SFS 1998:1252, issued on 3 September 1998, entered into force on 1 January 1999.	This ordinance, adopted by the Swedish Government, contains provisions on the protection of areas pursuant to Chapter 7 of the Environmental Code.
4	Document by the Swedish Environmental Protection Agency listing the established or upgraded nature reserves.	For each item, a unique identifier is provided.
5	Document by the Swedish Environmental Protection Agency describing the content in the document listing the established or upgraded nature reserves.	This document accompanies evidence 4, describing the content and explaining the abbreviations used.

6	Decisions of the County Administrative Boards on the establishment or upgrade of nature reserves.	In the context of the sampling, and for the further verification of the target, these supporting documents were provided for the 60 sampled units.

3. Analysis:

The justification and substantiating evidence provided by the Swedish authorities cover all constitutive elements of the target.

At least 270 nature reserves shall be established or upgraded.

The legal conditions for establishing and modifying nature reserves are described in Chapter 7 of the Environmental Code (1998:808), no. SFS 1998:808 (hereinafter referred to as the "*Environmental Code*", *evidence 2).* The legal conditions are further detailed in Ordinance (1998:1252) on area protection under the Environmental Code etc, no. SFS 1998:1252 (evidence 3). In addition, there are specific requirements and restrictions for each nature reserve depending on the local conditions and the type of natural values to be protected in the nature reserves. These conditions are specified by the County Administrative Board's decision on the nature reserve. The decision also states whether it is a new nature reserve (established) or an expanded or reinforced nature reserve (upgraded).

In particular, Chapter 7, Article 4 of the Environmental Code stipulates that an area of land or water may be declared a nature reserve by the County Administrative Board or municipality for the purpose of preserving biological diversity, caring for and preserving valuable natural environments, or meeting the need for areas for outdoor recreation. An area that is needed to protect, restore or recreate valuable natural environments or habitats for species worthy of protection may also be declared a nature reserve.

Moreover, Chapter 7, Article 5 of the Environmental Code further requires that a decision to establish a nature reserve must state the reasons for the decision and specify the restrictions on the right to use land and water areas that are necessary to achieve the purpose of the reserve, such as prohibitions on building, erecting fences, storage, excavation, quarrying, cultivation, drainage, planting, logging, hunting, fishing, the use of pesticides and access. If new reasons subsequently arise or further restrictions are needed to achieve the purpose of the protection, the County Administrative Board or municipality may issue a decision to this effect.

In addition, Chapter 7, Article 7 of the Environmental Code specifies that the County Administrative Board or municipality may revoke, in whole or part, a decision it has issued if there are exceptional reasons for doing so. This can include the replacement of an old decision with a new decision on an upgraded nature reserve.

The Swedish authorities provided a document by the Swedish Environmental Protection Agency listing 274 established or upgraded nature reserves (evidence 4) and an accompanying document by the Swedish Environmental Protection Agency describing the content in the document listing the established or upgraded nature reserves (evidence 5). Following the selection of a random sample of 60 units, Sweden submitted decisions of the County Administrative Boards on the establishment or upgrade of nature reserves (evidence 6). The evidence provided for a sample of 60 units confirmed that the requirement of the target has been met, specifically that at least 270 nature reserves must be established or upgraded, thus exceeding the goal of Target 18 by 4 established or upgraded nature reserves.

All decisions the Commission services examined dated from after 1 February 2020. Each decision specifies the purpose of the nature reserve and the restrictions on the right to use the area in order to achieve the purpose of the protection. The decisions further specify whether a nature reserve was newly established or whether an existing nature reserve was upgraded. Out of the 60 units, 45 are newly established nature reserves and 15 upgraded nature reserves. In the case of upgraded nature reserves, the decisions concern an expansion of the nature reserve and/or amended regulations to reinforce the protection of the nature reserve. Through the expansion of nature reserves, formal protection was extended to adjoining areas of similar character, in which land use or exploitation could otherwise have entailed a loss of identified natural values. Where the decisions involved amended regulations, older reserve provisions – often dating back decades – were revised or replaced to better safeguard the natural values of the respective area, for example by restricting activities previously permitted, such as logging, and by enabling management measures necessary to achieve the purpose of the nature reserve in accordance with current knowledge and objectives. The decisions also describe the compensation arrangements for landowners in respect of the restrictions imposed on the use of the area. The decisions provided by the Swedish authorities for the selected sample can be attributed to each established or upgraded nature reserve on the basis of the unique identifier as well as the name of the nature reserve.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Preliminary Assessment – M/T specific section:

Non-repayable support

Number and name of the Target: 22 – T4: New study places in vocational training and adult education

Related Measure: B.I1 More study places in regional adult vocational education

Quantitative Indicator: Number of full-time equivalent study places

Baseline: 15700

Target: 16900

Time: Q4 2023

1. Context:

The objective of the investment is for more people to obtain vocational training at upper secondary level and hence be able to get a job, as well as to ensure the matching in the labour market and boost employment in the long term.

Target 22 concerns new full-time equivalent study places in vocational training and adult education in 2023.

Target 22 is the fourth and last target of the investment, and it follows the completion of target 19, target 20 and target 21, related to new full-time equivalent study places in vocational training and adult education in the years 2020, 2021 and 2022 respectively.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document.	Summary document duly justifying how the target (including all the constitutive elements of the target) was satisfactorily fulfilled.
2	Annual study places and number of students per responsible municipality 2023, no. 2024:415.	The summary of the extract from the database prepared by the National Agency for Education indicates the total number of created annual study places, including per individual municipality in 2023.
3	List of annual study places for 2023.	The extract from the database prepared by the National Agency for Education contains a list of the total number of created annual study places per type of grant and individual municipality in 2023.
4	Ordinance on adult learning, no. SFS 2011:1108, issued on 3 November 2011, published in the Swedish Code of Statues on 15 November 2011 and entered into force on 15 December 2011.	The Ordinance, adopted by the Swedish Government, is also accessible at: https://www.riksdagen.se/sv/dokument-lagar/dokument/svensk-forfattningssamling/forordning-20111108-om-vuxenutbildning_sfs-2011-1108.
5	Ordinance (2016:937) on state	The Ordinance, adopted by the Swedish

	subsidies for regional vocational adult education, no. SFS 2016:937, issued on 27 October 2016, published in the Swedish Code of Statutes on 8 November 2016 and entered into force on 1 January 2017.	Government, is also accessible at: https://www.riksdagen.se/sv/dokument-lagar/dokument/svensk-forfattningssamling/forordning-2016937-om-statsbidrag-for-regional_sfs-2016-937.
6	Decisions on the state grant adopted by the responsible national authority to fund the trainings.	In the context of the sampling analysis, and for the further verification of the target, 60 decisions issued for trainings in the year 2023 were provided for the list of 60 sampled units. These decisions are issued on the basis of Ordinance (2016:937) on state subsidies for regional vocational adult education, taking into account the requirements defined in Ordinance on adult learning.
7	Transcripts of the trainings submitted by the municipalities on the implementation of the trainings (including the number of students, course code and number of credit points earned).	In the context of the sampling analysis, and for the further verification of the target, 60 transcripts for the implemented trainings in the year 2023 were provided for the list of 60 sampled units.
8	Decisions on the reporting issued by the responsible national authority confirming the outcome of the trainings.	In the context of the sampling analysis, and for the further verification of the target, 60 decisions issued for trainings in the year 2023 were provided for the list of 60 sampled units.

3. Analysis:

The justification and substantiating evidence provided by the Swedish authorities cover all constitutive elements of the target.

Number of new full-time equivalent study places in 2023 with priority given to individuals with the greatest need of education, for example unemployed or individuals with short previous education, as compared to the baseline number of annual study places in 2019 of 34 000. The new study places created shall bring the total number of study places to 35 200. Furthermore, in line with the measure description, **the measure consists in supporting new study places in vocational training and adult education.**

As defined in Chapter 2, Section 2 of the Ordinance (2011:1108) on adult learning *(hereinafter referred to as "Ordinance (2011:1108)")* (evidence 4), an annual full-time equivalent study place corresponds to 800 activity points (*verksamhetspoang*). In line with this and the data reported by the municipalities for 2023 (evidence 2 and 3), the National Agency for Education (*Skolverket*) compiled the total number of education points, divided them by 800 and calculated the total number of annual study places (evidence 2). This number was rounded to the nearest number of full-time equivalent annual study places (evidence 2). As further confirmed by evidence 2 and 34 679 new study places in vocational training and adult education have been supported. According to the evidence provided, Sweden supported a total of 38 679 annual study places in vocational training and adult education in 2023 (evidence 2, Table 2 and evidence 3). As compared to the set baseline number of 34 000 annual study places in 2019, this has led to the creation of 4 679 new full-time

equivalent study places in 2023, thus exceeding the goal of Target 22 by 3 479 new full-time equivalent study places in 2023.

Chapter 3, Article 7 of ordinance (2011:1108) (evidence 4) provides that, by design, priority is given in the adult education selection process to individuals with the greatest need of education, for example unemployed or individuals with short previous education, such as: i) individuals who have not met the requirements for an upper secondary school diploma or have not completed any education equivalent to upper secondary level (point 2), and ii) individuals who are unemployed or at risk of becoming unemployed (point 3). In addition, as specified in Article 1 of Ordinance (2016:937) on state subsidies for regional vocational adult education (hereinafter referred to as "Ordinance (2016:937)") (evidence 5), which is the basis for issuing the decisions on the state grants (evidence 6) and which takes into account the requirements defined in Ordinance (2011:1108) (evidence 4), the purpose of state subsidies for vocational education and training in municipal adult education at upper secondary level, which support the annual study places, is to lead to the development of skills that are in demand on the labour market.

Following the selection of a random sample of 60 units, drawn for target 22, Sweden submitted the decisions on the state grants adopted by the responsible national authority to fund the trainings, (evidence 6), which specify that the education and skills needs, the level of unemployment and the education level are the basis for the allocation of the grants, transcripts of the trainings submitted by the municipalities on the implementation of the trainings (evidence 7), as well as the decisions on the reporting issued by the responsible national authority confirming the outcome of the trainings (evidence 8). This evidence demonstrates that the individual trainings with the corresponding study points have been implemented, and the state grants were accordingly paid out to the municipalities, thereby contributing to the creation of the total and new study places. The evidence provided for a sample of 60 units confirmed that the requirement of the target has been met, since the implemented and supported trainings confirm the creation of the total and new study places in line with the applicable national calculation methodology.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Preliminary Assessment – M/T specific section:

Non-repayable support

Number and name of the Target: 30 – T3: Additionally registered students in higher education

Related Measure: B.I3 Resources to meet demands for education at universities and other higher education institutions

Quantitative Indicator: Number of full-time equivalent registered students

Baseline: 19000

Target: 25000

Time: Q4 2023

1. Context:

The objective of this measure is to generate higher employment, underpin the supply of a well-educated labour force, better equip individuals for the future labour market, scale up the study programmes leading to qualifications in shortage occupations and boost the competitiveness of the Swedish business sector.

Target 30 concerns additional 6000 full-time equivalent registered students on any course given in higher education in 2023.

Target 30 is the third target of the investment and it is accompanied by target 31 in this payment request, and it follows the completion of target 28 and target 29. It will be followed by target 31 and target 32, related to additional full-time equivalent registered students in the years 2024 and 2025 respectively.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document.	Summary document duly justifying how the target (including all the constitutive elements) was satisfactorily fulfilled.
2	Extract of the number of full-time students per Higher Education Institution in 2023.	The extract prepared by the Swedish Higher Education Authority for the year 2023 contains data on the increase in the number of full-time students in higher education institutions and universities, as well as the list of the higher education institutions in which students were enrolled with the exact number of full-time equivalent registered students enrolled. The data is extracted from the national study administration system (*Ladok*), where all admissions and course registrations are made.
3	Model for calculating digital content 2023.	The model for calculating digital content, no. 111-00481-21 prepared by the Swedish Higher Education Authority for the year 2023, sets out the methodology for the calculation of the digital content and includes information on how many of the additional study places

		are increasing digital skills or contributing to the digital transition. The document also contains statistics on the allocation of places by field of study.
4	Annual reports of higher education institutions.	This covers the individual annual reports of 33 universities and higher education institutions in Sweden for the year 2023, showing the developments in terms of the number of registered students.
6	Budget Bill for 2023.	The Budget Bill for 2023 (Bill. Prop. 2022/23:1) approved by the Government covers Expenditure area 16: Education and university research. The Budget Bill sets out the proposal for the budget for 2023, which corresponds to the approved budget.

3. Analysis:

The justification and substantiating evidence provided by the Swedish authorities cover all constitutive elements of the target.

6 000 additional full-time equivalent registered students on any course given by the university during the current semester in full time equivalent as compared to the baseline of 300 400 registered full year students in 2019, resulting in a total number 306 400 full-time students in Q4 2023. Furthermore, in line with the measure description, **the measure consists in supporting additional full-time equivalent students (study places) in higher education**.

As defined in the Extract of the number of full-time students per Higher Education Institution in 2023 (column I) (evidence 2), which compiles the data from the national study administration system *(Ladok),* and as supported by the Annual reports of higher education institutions (evidence 4), the Swedish Higher Education Authority reported a total of 314 363 full-time equivalent registered students (study places) on any course given by the universities during the autumn 2023 semester. As further confirmed by evidence 2 and 4, additional 13 963 full-time equivalent students (study places) were supported in higher education. According to the evidence provided, Sweden supported 314 363 full-time equivalent registered students in higher education in 2023. As compared to the baseline of 300 400 registered full-time equivalent students in 2019, additional 13 963 full-time equivalent students were registered in higher education in 2023, thus exceeding the goal of Target 30 by 7 963 additional full-time equivalent registered students.

On average, 27% of the additional study places shall increase digital skills or contribute to the digital transition in some other way.

As defined in the Model for calculating digital content 2023, pages 3-4 (evidence 3), which sets out the methodology for the calculation of the digital content, the contribution to digital skills or the digital transition is determined on the basis of a flat-rate calculation, which takes into account a) the number of new full-time students per area of education and training reported by the higher education institutions, b) the content of the courses, which are classified into 21 areas of education and training, c) the objectives of the diploma scheme related to digital skills and competences for different degrees. In line with the above-mentioned methodology (evidence 3) and based on the data from the national study administration system *(Ladok)* (evidence 2), the digital content is considered to be more prominent (meaning that it goes beyond supporting just basic digital skills) for 9 out of 21 areas of education and training. As further calculated in line with the above-

mentioned methodology (evidence 3) and when considering the change in the number of full-time students per field of education between 2019 and 2023, on average 56.1% of the additional full-time study places reported in 2023 contributed towards increasing digital skills or were contributing to the digital transition in some other way.

A focus shall be on programmes geared towards shortage occupations.

As stated in Chapter 5.6.2 of the Budget Bill 2023 (evidence 6), universities and higher education institutions must continue to prioritise their resources on the programmes and studies, which are targeting shortage occupations, such as Early Childhood Education and Care (ECEC) teacher and teacher training programmes, technology and electrician training, and healthcare studies. The developments on programmes targeting shortage occupations are further explained in the reports of the higher education institutions (evidence 4), which also provide more detailed information on the student enrolment in different programmes provided by the individual higher education institution, including in relation to programmes targeting shortage occupations, such as for teachers, healthcare and technology professionals, and engineers.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Preliminary Assessment – M/T specific section:

Non-repayable support

Number and name of the Target: 31 – T4: Additionally registered students in higher education

Related Measure: B.I3 Resources to meet demands for education at universities and other higher education institutions

Quantitative Indicator: Number of full-time equivalent registered students

Baseline: 25000

Target: 30600

Time: Q4 2024

1. Context:

The objective of this measure is to generate higher employment, underpin the supply of a well-educated labour force, better equip individuals for the future labour market, scale up the study programmes leading to qualifications in shortage occupations and boost the competitiveness of the Swedish business sector.

Target 31 concerns additional 5600 full-time equivalent registered students on any course given in higher education in 2024.

Target 31 is the fourth target of the investment and it follows the completion of targets 28, 29 and 30. It will be followed by target 32, related to additional full-time equivalent registered students in the year 2025.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document.	Summary document duly justifying how the target (including all the constitutive elements) was satisfactorily fulfilled.
2	Extract of the number of full-time students per Higher Education Institution in 2024.	The extract prepared by the Swedish Higher Education Authority for the year 2024 contains data on the increase in the number of full-time students in higher education institutions and universities, as well as the list of the higher education institutions in which students were enrolled with the exact number of full-time equivalent registered students enrolled. The data is extracted from the national study administration system (*Ladok*), where all admissions and course registrations are made.
3	Model for calculating digital content 2024.	The model for calculating digital content, no. 111-0048-21; prepared by the Swedish Higher Education Authority for the year 2024 sets out the methodology for the calculation of the digital content and includes information on how many of the additional study places are increasing digital skills or contributing to the digital

		transition. The document also contains statistics on the allocation of places by field of study.
4	Annual reports of higher education institutions.	This covers the individual annual reports of 33 universities and higher education institutions in Sweden for the year 2023, showing the developments in terms of the number of registered students.
5	Budget Bill 2024.	The Budget Bill for 2024 (Bill. Prop. 2023/24:1) approved by the Government covers Expenditure area 16: Education and university research. The Budget Bill sets out the proposal for the budget for 2024, which correspond to the approved budget.

3. Analysis:

The justification and substantiating evidence provided by the Swedish authorities cover all constitutive elements of the target.

5 600 additional full-time equivalent registered students on any course given by the university during the current semester in full time equivalent as compared to the baseline of 300 400 registered full year students in 2019, resulting in a total number 306 000 full-time students in Q4 2024. Furthermore, in line with the measure description, **the measure consists in supporting additional full-time equivalent students (study places) in higher education**.

As defined in the Extract of the number of full-time students per Higher Education Institution in 2025 (column I) (evidence 2), which compiles the data from the national study administration system *(Ladok),* and as supported by the Annual reports of higher education institutions (evidence 4), the Swedish Higher Education Authority reported a total of 322 471 full-time equivalent registered students (study places) on any course given by the universities during the autumn 2024 semester. As further confirmed by evidence 2 and 4, additional 22 071 full-time equivalent students (study places) were supported in higher education. According to the evidence provided, Sweden supported 322 471 full-time equivalent registered students in higher education in 2024. As compared to the baseline of 300 400 registered full-time equivalent students in 2019, additional 22 071 full-time equivalent students were registered in higher education in 2024, thus exceeding the goal of Target 31 by 16 471 additional full-time equivalent registered students.

On average, 27% of the additional study places shall increase digital skills or contribute to the digital transition in some other way.

As defined in the Model for calculating digital content 2024, pages 3-4 (evidence 3), which sets out the methodology for the calculation of the digital content, the contribution to digital skills or the digital transition is determined on the basis of a flat-rate calculation, which takes into account a) the number of new full-time students per area of education and training reported by the higher education institutions, b) the content of the courses, which are classified into 21 areas of education and training, c) the objectives of the diploma scheme related to digital skills and competences for different degrees. In line with the above-mentioned methodology (evidence 3) and based on the data from the national study administration system *(Ladok)*, the digital content is considered to be more prominent (meaning that it goes beyond supporting just basic digital skills) for 9 out of 21 areas of education and training. As further calculated in line with the above-mentioned methodology (evidence 3) and when considering the change in the number of full-time students per field of education between 2019 and 2024, on average 51% of the additional full-time study places reported

in 2024 contributed towards increasing digital skills or were contributing to the digital transition in some other way.

A focus shall be on programmes geared towards shortage occupations.

As stated in Chapter 5.6.3 of the Budget Bill 2024 (evidence 5), universities and higher education institutions must continue to prioritise their resources on the programmes and studies, which are targeting shortage occupations, such as Early Childhood Education and Care (ECEC) teacher and teacher training programmes, technology and electrician training, and healthcare studies. The developments on programmes targeting shortage occupations are further explained in the reports of the higher education institutions (evidence 4), which also provide more detailed information on the student enrolment in different programmes provided by the individual higher education institution, including those in relation programmes targeting to shortage occupations, such as for teachers, healthcare and technology professionals, and engineers.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Preliminary Assessment – M/T specific section:

Non-repayable support

Number and name of the Milestone: 33bis – Entry into force of legislation for the introduction of a national professional programme

Related Measure: B.R3 National professional programme for principals, teachers and early childhood education and care teachers

Qualitative Indicator: Provisions indicating the entry into force of legislation.

Time: Q3 2025

1. Context:

The objective of this measure is to increase the attractiveness of the teaching profession leading to a higher number of teachers and early childhood education and care (ECEC) teachers who want to continue enhancing their competencies after becoming a teacher.

Milestone 33bis is the only milestone of this reform, related to the entry into force of legislation enabling the introduction of a national professional programme for principals, teachers and ECEC teachers with a national structure for the enhancement of professional competences and a national merit system for licensed teachers and ECEC teachers.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document.	Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.
2	Act amending the Education Act (2010:800), no. SFS 2023: 393, issued on 8 June 2023, published in the Swedish Code of Statues on 15 June 2023, and entered into force on 1 January 2025.	This act, adopted by the Swedish Parliament (Riksdagen), amends the Education Act (2010:800) and enables the introduction of a national professional programme for principals, teachers and ECEC teachers.
3	Ordinance on national professional programmes for principals, teachers and ECEC teachers, no. SFS 2025: 280, issued on 10 April 2025, published in the Swedish Code of Statutes on 15 April 2025 and entered into force on 1 September 2025.	The ordinance, adopted by the Swedish Government, contains the more detailed provisions on the national professional programme for principals, teachers and ECEC teachers.

3. Analysis:

The justification and substantiating evidence provided by the Swedish authorities cover all constitutive elements of the milestone.

Entry into force of legislation enabling the introduction of a national professional programme for principals, teachers and ECEC teachers. Furthermore, in line with the qualitative indicator, **provisions indicating the entry into force of legislation.**

The Act amending the Education Act (2010:800) *(hereinafter referred to as "the amended Education Act")* was issued on 8 June 2023 and published in the Swedish Code of Statutes on 15 June 2023. As stipulated in the amended Education Act (page 8, point 1), the amendments entered into force on 1 January 2025. Chapter 2, Article 34 of the amended Education Act introduces a national professional programme within the school system for principals, teachers and ECEC teachers.

The Ordinance on national professional programmes for principals, teachers and ECEC teachers *(hereinafter referred to as "the Ordinance")* was issued on 10 April 2025 and published in the Swedish Code of Statutes on 15 April 2025. As stipulated in the Ordinance (page 11, point 1), it entered into force on 1 September 2025. As defined in Article 1, paragraph 1 of the Ordinance, the Ordinance contains provisions on the national professional programme for principals, teachers and ECEC teachers.

The national professional programme shall consist of:
a) a national structure for the enhancement of professional competences of principals, teachers and ECEC teachers, which shall include trainings for principals, teachers and ECEC teachers, and

As specified in Chapter 2, Article 34 of the amended Education Act (evidence 2), the national professional programme must include a national structure for the development of professional competences and skills of principals, teachers and ECEC teachers, which according to the mentioned Article 34 needs to cover a) skills development training that can serve as a basis for a qualification level (paragraph 3, point 1); and b) other skills development training for principals, teachers and ECEC teachers (paragraph 3, point 2). Article 3 of the Ordinance (evidence 3) further specifies that the national structure for the development of professional competences must include offers of relevant competence development activities (such as different types of trainings), for teachers and ECEC teachers (paragraph 1, point 1 and paragraph 2), as well as for principals, deputy principals and employees or contractors who have been assigned to fulfil certain management tasks (paragraph 1, point 2).

b) a national merit system for licensed teachers and ECEC teachers, which includes the qualification levels.

Chapter 2, Article 34 of the amended Education Act (evidence 2) stipulates that the national professional programme must include a national qualification system for licensed teachers and licensed ECEC teachers, whereby the merit system must have different levels and one of the levels must be subject to a postgraduate degree. In addition, the Ordinance (evidence 3), determines the national merit system must have four levels (Article 4) and sets out the eligibility requirements for each qualification level (Articles 6-9), whereby the number of years in the teaching profession and the number of credits from post-graduate studies are the basis for the qualification. In addition, Article 11 of the Ordinance (evidence 3), determines that the National Agency for Education is responsible for deciding on the qualification levels following an application by licensed teachers and licensed ECEC teachers.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Preliminary Assessment – M/T specific section:

Non-repayable support

Number and name of the Target: 35 – 8 000 participants have started education in the framework of the Elderly care Initiative

Related Measure: C.I1 Elderly care initiative

Quantitative Indicator: Number

Baseline: 1500

Target: 8000

Time: Q4 2023

1. Context:

The measure aims to increase the quality of Sweden's long-term care system by providing training to at least 8000 staff working in elderly care centres.

Target 35 requires that at least 8000 staff members of the elderly care have started the education.

Target 35 is the second and final step of the implementation of the investment. It was preceded by target 34, which covered 1500 staff members starting education.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document.	Summary document duly justifying how the target (including all the constitutive elements) was satisfactorily fulfilled.
2	Annex 1 Curriculum of the National package of vocational courses from the care programme, designed to work as a nurse.	Document by the National Agency for Education (*Skolverket*) describing the curriculum of the National package of vocational courses from the care programme (1500 points), designed to work as a nurse (applicable as of 1 July 2021, revised on 22 January 2022).
3	Annex 2 Curriculum of the National package of vocational courses from the care programme designed to work as a nurse.	Document by the National Agency for Education (*Skolverket*) describing the curriculum of the National package of vocational courses from the care programme (1500 points) designed to work as a nurse (applicable until 30 June 2021).
4	Annex 3 Curriculum of the National package of vocational courses to train as nursing assistant.	Document by the National Agency for Education (*Skolverket*) describing the curriculum of the National package of vocational courses (800 points) to train as nursing assistant.
5	Annex 4 Content of a training course to work as specialist nurse in the	Document by Kompetensutvecklingsinstitutet describing the content of a training course to work as specialist nurse in the area of care for the multi-

	area of care for the multi-diseased elderly.	diseased elderly.
6	Annex 5 Curriculum of a training course to become a nurse specialised on dementia care.	Document by the Agency for Higher vocational Education (*Yrkeshögskolan*) and Consensum describing the curriculum of a training course to work as a specialist nurse in dementia care.
7	Annex 6 Content of training courses to work as specialist nurse in the area of palliative care.	Document by Vård och Omsorgscollege Örebro län and Örebro municipality summarising the content of training courses to work as specialist nurse in the area of palliative care.
8	Annex 7 Curriculum of a management training with a focus on care for the elderly.	Document by University college of Borås describing the curriculum of a management training with a focus on care for the elderly.
9	Annex 8 Curriculum of a training course on leadership for managers in elderly care.	Document by Marie Cederschiölds Högskola describing the curriculum of a training course on leadership for managers in elderly care.
10	Annex 9 Curriculum content of a training course (validation) to work as a nurse.	Document by Hermods describing the curriculum content of a training course (validation) to work as a nurse.
11	Annex 10 Curriculum of training courses to work as nurse.	Document by Skövde municipality Vård-omsorgscollege describing the curriculum of a training course to work as nurse.
12	Annex 11 Curriculum of a training course to work as nurse.	Document by Campus Nyköping describing the curriculum of a training course to work as a nurse in the area of palliative care
13	Annex 12 Curriculum of a training course to work as specialist nurse in the area of care for multi-diseased elderly.	Document by the Agency for Higher vocational Education (*Yrkeshögskolan*) describing the curriculum of a training for to work as a nurse in the area of care for multi-diseased elderly.
14	Annex 13 Curriculum contents of a training course to work a specialist nurse in elderly care.	Document by the Agency for Higher vocational Education (*Yrkeshögskolan*), Samariterhemmet and Folkuniversitetet describing the curriculum of a training course to work as specialist nurse in elderly care with a focus on health and rehabilitation.
15	Annex 14a Curriculum contents of a training course to work a specialist nurse.	Document by YRGO describing the curriculum contents of training courses to work as qualify as a specialist nurse in the fields of gerontology, geriatrics, dementia care and rehabilitation.
16	Annex 14b Curriculum contents of a training course to work as a nurse in elderly care.	Document by YRGO describing the curriculum contents of training courses to work as qualify as a nurse in the field of elderly care.
17	Annex 14c Curriculum contents of a training course to work a nurse in elderly care.	Document by YRGO describing the curriculum contents of training courses to work as qualify as a nurse in the field of elderly care.
18	Annex 15	Document by Skövde municipality describing the

	Curriculum of a training course to work as a specialist nurse in elderly care.	curriculum of training courses to work as specialist nurse in elderly care.
19	Annex 16 Curriculum contents of a training course to work as a nurse.	Document by Hermods and Helsingborg municipality describing the curriculum contents of a training course to work as a nurse.
20	Annex 17 Curriculum of a training course to work as a specialist nurse.	Document by the Agency for Higher Vocational Education (*Yrkeshögskolan*) describing the curriculum of a training course to work as a specialist nurse in elderly care.
21	Annex 18 Curriculum of a training course to work as a specialist nurse.	Document by the Agency for Higher Vocational Education (*Yrkeshögskolan*) describing the curriculum of a training course to work as a specialist nurse.
22	Annex 19 Curriculum of a training course to work as specialist nurse.	Document by the Agency for Higher Vocational Education (*Yrkeshögskolan*) and Yrkeshögskolan Höga Kusten and Kramfors municipality describing the curriculum of a training course to work as specialist nurse in the field of dementia care.
23	Annex 20 Curriculum of a training course to work as specialist nurse.	Document) by the Agency for Higher Vocational Education (*Yrkeshögskolan*) and Arboga municipality describing the content of a training course to work as specialist nurse in the area of dementia car.
24	Annex 21 Curriculum of a training course for public sector managers.	Document by Uppsala Universitet presenting a training course for public sector managers.
25	Annex 22 Summary of curriculum of a training course to work as a specialist nurse.	Document by the municipality of Kristianstad describing the training curricula for courses for specialist nurses in the field of care of the elderly.
26	Annex 23 Curriculum of a training course to work as a nurse.	Document by the Agency for Higher Vocational Education (*Yrkeshögskolan*) and KompetensUtvecklingsInstitutet Sverige AB describing the curriculum of a training course to work as a nurse in the area of palliative care.
27	Annex 24 Curriculum contents of a training course to work as a specialist nurse.	Document by the Agency for Higher Vocational Education (*Yrkeshögskolan*) describing the curriculum of training courses to work as a specialist nurse in the area of gerontology, geriatrics, dementia and rehabilitation.
28	Annex 25 Curriculum of a training course to work as specialist nurse.	Document by Yrkeshögskolan i Mölnlycke describing the curriculum of training to work as a specialist nurse in care for the elderly.
29	Annex 26 Curriculum of training courses to work as specialist nurse.	Document by YRGO describing the curriculum contents of training courses to work as a specialist nurse in the field of psychiatric care.
30	Annex 27 Curriculum of a training course in working as a manager in the area of public sector care.	Document by Mälardalens Universitet describing the curriculum of a training course in working as a manager in the area of public sector care.
31	Annex 28	Document by the Agency for Higher Vocational

	Curriculum contents of a training course to work as a specialist nurse.	Education (Yrkeshögskolan) and Skellefteå kommun describing the curriculum contents of a training course to work as a specialist nurse in the field of dementia and psychiatric care.
32	Annex 29 Content of a training course for managers in social services.	Document by Högskolan Dalarna summarising the content of a training course for managers in social services.
33	Annex 30 Curriculum of training courses to work as a specialist nurse in the area of multi-diseased elderly.	Document by the Agency for Higher Vocational Education (*Yrkeshögskolan*) and KompetensUtvecklingsInstitutet Sverige AB describing the curriculum of training courses to work as a specialist nurse in the area of multi-diseased elderly
34	Annex 31 Curriculum contents of training courses to work as a nurse.	Document by MoA Lärcentrum describing the curriculum contents of training courses to work as a nurse.
35	Annex 32 Curriculum of a training course for managers.	Document by Linköping University summarising the curriculum of a training course for managers.
36	Annex 33 Curriculum of a training course for nurses in the area of dementia care.	Document by Forshaga kommun summarising the curriculum content of training courses to work as a nurse in the area of dementia care.
37	Annex 34 Curriculum of training courses for specialist nurses in the area of psychiatry.	Document by Consensum Yrkeshögskola describing the curriculum of training courses for specialist nurses in the area of psychiatry.
38	Annex 35 Curriculum contents of training courses to work as specialist nurse in the area of dementia care.	Document by TUC Yrkeshögskola summarising the curriculum content of a training courses for specialist nurses in the area of dementia care.
39	Annex 36 Curriculum of training courses to work as a specialist nurse in the area of palliative care.	Document by the Agency for Higher Vocational Education (*Yrkeshögskolan*) and Hermods AB Karlskrona describing the curriculum of a training course to work as a nurse in the area of palliative care.
40	Annex 37 Curriculum contents of training courses to work as specialist nurse.	Document by the Agency for Higher Vocational Education (*Yrkeshögskolan*) and TUC Yrkeshögskola summarising the curriculum content of a training course to work a specialist nurse in the area of psychiatric care.
41	Annex 38 Curriculum contents of a diploma to qualify as a specialist nurse in the field of psychiatry.	Excerpt (scan) of a certificate issued by the Agency for Higher Vocational Education (*Yrkeshögskolan*) describing the curriculum contents of a diploma of an anonymised individual to qualify as a specialist nurse in the field of psychiatry.
42	Annex 39 Curriculum contents of training courses to work as a specialist nurse in the field of dementia care.	Document by Sophiahemmet Högskola describing the curriculum contents of training courses to work as a specialist nurse in the field of dementia care.
43	Annex 40	Document by Vård- och omsorgscollege summarising

	Curriculum content of training courses to work as a nurse.	the curriculum content of training courses to work as a nurse.
44	Annex 41 Curriculum contents of a training course to work as a specialist nurse in the field of palliative care.	Document by TUC Yrkeshögskola and the Agency for Higher Vocational Education (*Yrkeshögskolan*) describing the curriculum contents of a training course to work as a specialist nurse in the field of palliative care.
45	Annex 42 Curriculum content of training courses to work as specialist nurse in dementia care.	Document by the Agency for Higher Vocational Education (*Yrkeshögskolan*) describing the curriculum content of training courses to work as specialist nurse in dementia care.
46	Annex 43 Curriculum content of a training course to work as a nurse in the area of welfare technology.	Document by the Agency for Higher Vocational Education (*Yrkeshögskolan*) and Skövde kommun summarising the curriculum content of a training course to work as a nurse in the area of welfare technology.
47	Annex 44 Curriculum content of a training course for managers in elderly care.	Document by Marie Cederschiöld Högskola summarising the curriculum content of a training course for managers in elderly care.
48	Annex 45 Curriculum contents of a training course to work as a specialist nurse in dementia care.	Document by the Agency for Higher Vocational Education (*Yrkeshögskolan*) describing the curriculum contents of a training course to work as a specialist nurse in dementia care.
49	Annex 46 Presentation of training courses to work as a specialist nurse in palliative care.	Document by the Agency for Higher Vocational Education (*Yrkeshögskolan*) and Consensum summarising the curriculum content of a training course to work as specialist nurse in palliative care.
50	Annex 47 Curriculum content of training courses to work as a nurse.	Document by Vuxenutbildningen Campus västra Skaraborg certifying the curriculum content of training courses to work as a nurse in elderly care.
51	Annex 48 Curriculum content of a training course to work as specialist nurse in the field of elderly care and welfare technologies.	Document by the Agency for Higher Vocational Education (*Yrkeshögskolan*) and Nova describing the curriculum content of a training course to work as specialist nurse in the field of elderly care and welfare technologies.
52	Annex 49 Curriculum content of a training course for managers in elderly care.	Document by Uppsala university describing the curriculum content of a training course for managers in elderly care.
53	Annex 50 Curriculum content of training/validation courses to work as nurse.	Document by Malmö Stad summarising the curriculum content of training/validation courses to work as a nurse as well as an email by a municipality manager certifying that the content is correct.
54	Annex 51 Curriculum content of a training course to work as specialist nurse.	Document by the Agency for Higher Vocational Education (*Yrkeshögskolan*) and Kunskapsförbundet Väst, Vuxenutbildningen, describing the content of a training course to work as a specialist nurse in the area of palliative care and care for the multi-diseased.

55	Annex 52 Curriculum content of a training course for managers.	Document by Högskolan Dalarna describing the curriculum content of a training course for managers.
56	Annex 53 Curriculum content of a training course to work as a specialist nurse in the area of psychiatry.	Document by the Agency for Higher Vocational Education (*Yrkeshögskolan*) describing the curriculum content of a training course to work as a specialist nurse in the area of psychiatry.
57	Annex 54 Curriculum of a training course to work as nurse in the area of dementia care.	Document by the Agency for Higher Vocational Education (*Yrkeshögskolan*) describing the curriculum content of a training course to work as a nurse in the area of dementia care.
58	Annex 55 Curriculum content of a training course to work as a specialist nurse.	Document by the Agency for Higher Vocational Education (*Yrkeshögskolan*) describing the curriculum content of a training course to work as a specialist nurse.
59	Annex 56 Contents of a training course in leadership.	Document by Marie Cederschiöld Högskola certifying the contents of a training course in leadership in the social work and care area.
60	Annex 57 Curriculum content of a training course in leadership.	Document by Högskolan i Borås describing the curriculum content of a training course in leadership.
61	Annex 58 Curriculum content of a training course to work as specialist nurse in the field of neuropsychiatry	Document by YH-Akademin summarising the curriculum content of a training course to work as specialist nurse in the field of neuropsychiatry.
62	Annex 59 Curriculum content of a training course to work as a specialist nurse in the area of cognitive disease.	Document by TUC Yrkeshögskola summarising the curriculum content of a training course to work as a specialist nurse in the area of cognitive disease.
63	Annex 62 MS Excel spreadsheet containing a list of 6500 individuals who have started an education during the years 2020-2023 in the framework of the Elderly care initiative.	MS Excel spreadsheet containing a list of 6500 individuals who have started an education during the years 2020-2023 in the framework of the Elderly care initiative, specified with the following information for each individual (columns A-H): - a unique identifier (in the form of numbers 1-6500) - the municipality receiving the disbursement to cover for the participant's training - the year in which the training started - the name initials of the individual - the professional role/position of the individual at the start of the education - the name and location of the entity/organisation performing the training - a description of the training - reference to which one of the annexes 1-75 describe the contents of the training course that each individual has started.
64	Annex 64	Government order from the government to the

	Government Decision of 14 January 2021 number *S2021/00338 (partial).*	National Board of Health and Welfare *(Socialstyrelsen)* to pay state grants to municipalities to compensate for costs incurred in the context of the Elderly Care initiative (expanding the scope of the initiative to include also training for heads of unit).
65	Annex 65 Document issued by the National Board of Health and Welfare with descriptions of each of the types of training/education.	Document issued by the National Board of Health and Welfare *(Socialstyrelsen)* with short descriptions of each of the types of training in annexes 1-59.
66	Annex 67 Report, dated 24 October 2023, from the National Board of Health and Welfare on the implementation during 2022 of the Elderly care initiative; official registry number *Dnr 9.2-37245/2021.*	The report describes in detail the results for the year 2022 of the Elderly Care initiative as a whole (i.e. including also the parts that have been financed outside of the RRP), providing statistics on e.g. gender distribution among participants, types of training taken, etc.
67	Annex 68 Report, dated November 2024, from the National Board of Health and Welfare on the implementation during 2023 of the Elderly care initiative; *Publication number 2024-11-9291.*	The report describes (pages 42-54) in detail the results for the year 2023 of the Elderly Care initiative as a whole (i.e. including also the parts that have been financed outside of the RRP), providing statistics on e.g. gender distribution among participants, types of training taken, etc.
68	Annex 69 Report, dated 26 October 2021, from the National Board of Health and Welfare on the implementation during 2020 of the Elderly care initiative; official registry number *Dnr 9.2-19753/2020.*	The report describes in detail the results for the year 2020 of the Elderly Care initiative as a whole (i.e. including also the parts that have been financed outside of the RRP), providing statistics on e.g. gender distribution among participants, types of training taken, etc.
69	Annex 70 Report, dated 25 October 2022, from the National Board of Health and Welfare on the implementation during 2021 of the Elderly care initiative; official registry number *Dnr 9.2-5634/2021.*	The report describes in detail the results for the year 2021 of the Elderly Care initiative as a whole (i.e. including also the parts that have been financed outside of the RRP), providing statistics on e.g. gender distribution among participants, types of training taken, etc.
70	Annex 71 Government Decision of 4 June 2020 number *S2020/05025/SOF (partial).*	Government order S2020/05025/SOF (*delvis*) from the government to the National Board of Health and Welfare (*Socialstyrelsen*) to pay state grants to municipalities to compensate for costs incurred in the context of the Elderly Care initiative.
71	Annex 72 Document issued on 15 June 2020 by the National Board of	Document Dnr 9.2-19763/2020 issued by the National Board of Health and Welfare *(Socialstyrelsen)* instructing municipalities how they can apply for

	Health and Welfare; Dnr 9.2-19763/2020.	funding from the Board to compensate for costs incurred by having members of staff in elderly care undergo training in the context of the Elderly Care initiative.
72	Annex 73 Government decision S2021/08234 of 22 Dec. 2021 addressed to the National Board of Health and Welfare *(Socialstyrelsen).*	Government decision S2021/08234 addressed to the National Board of Health and Welfare *(Socialstyrelsen)* mandating the Board the National Board of Health and Welfare (*Socialstyrelsen*) to continue to pay state grants to municipalities to compensate for costs incurred in the context of the Elderly Care initiative.
73	Annex 74 Government decision S2023/00484 of 2 Feb. 2023 addressed to the National Board of Health and Welfare *(Socialstyrelsen).*	Government decision S2023/00484 addressed to the National Board of Health and Welfare *(Socialstyrelsen)* mandating (p.9) the Board the National Board of Health and Welfare (*Socialstyrelsen*) to continue to pay state grants to municipalities to compensate for costs incurred in the context of the Elderly Care initiative.
74	Annex 75 Document issued 14 March 2025 by the National Board of Health and Welfare *(Socialstyrelsen) Dnr 1.3-114320-2023.*	Document issued by the National Board of Health and Welfare *(Socialstyrelsen)* DNR 1.3-114320-2023 defining detailed routines on how to administrate the Elderly Care initiative in the context of the RRP.
75	Annex 76 Document issued in 2025 by the National Board of Health and Welfare *(Socialstyrelsen)* constituting a detailed check list.	Document issued by the National Board of Health and Welfare *(Socialstyrelsen)* constituting a detailed check list for on-the-spot checks in the context of Elderly Care initiative.
76	Annex 77 Sampling evidence documents.	In the context of the sampling analysis, and for the further verification of the target, 79 pieces of evidence for the implemented trainings in the year 2023 were provided for the list of 60 sampled units (for some units, there were more than one document).

3. Analysis:

The justification and substantiating evidence provided by the Swedish authorities cover all constitutive elements of the target.

At least 8 000 staff members of the elderly care shall have started the education in the framework of the Elderly care initiative.

The Swedish authorities have provided a participation list of 6485 elderly care staff members that started training in 2020-2023 (see evidence 63).

The participation list contains in particular information on i) a unique identifier (in the form of numbers 1-6485), ii) the municipality receiving the disbursement to cover for the participant's training, iii) the year in which the training started, iv) the name initials of the individual, v) the professional role/position of the individual at the start of the education, vi) the name and location of the entity/organisation performing the training, vii) a description of the training, viii) reference to

the relevant annex (pieces of evidence 2-62) that describe the contents of the training course that each individual has started.

The pieces of evidence 2-62 describe the contents of each of the trainings and evidence 65 provides an overview of the main characteristics of each of them. An assessment of each training shows that the curricula are relevant to the skill sets pertinent to functioning as respectively nursing assistants (*vårdbiträde*), (specialist) nurses (*(specialist) undersköterska*) or Heads of Unit (*chefer/ledare*) in elderly care. The assessment of the relevance is made on the basis of their alignment with the contents of national packages of vocational courses to work as a nursing assistant/nurse, as defined by the National Agency for Education (pieces of evidence 2-4).

Following the selection of a random sample of 60 units, Sweden submitted digital copies of documents issued by either the training institutions themselves or by the municipalities responsible for the training. Evidence 76 confirmed, for each of the 60 units (i.e. participants, each identified by their name initials), the requirement that they had started a relevant type of training at the earliest on 1 February 2020. The documents evidencing that a participant had started a training were either certificates of participation from either the training institution or the municipality, or certificates of completed courses that include information on the start date of the courses.

The four government decisions contained in pieces of evidence 64, 70, 72 and 73 instruct the responsible authority, the National Board of Health and Welfare (*Socialstyrelsen*) to provide disbursements to municipalities participating in the Elderly Care initiative, in order to cover the wage related costs that these municipalities incur due to the training of staff in elderly care done during staff working hours. In addition, evidence 71 confirms that municipalities have been instructed that they can apply for funding from the National Board of Health and Welfare (*Socialstyrelsen*) for costs related to the wages of participating staff incurred due to staff doing training during working hours in the context of the Elderly Care initiative.

According to the summary document when the municipalities report to the National Board of Health and Welfare, they are to specify which employees have taken part in the training as well as the wage costs that are related to the relevant training period. The National Board of Health and Welfare performs several controls in order to ensure that the information provided by the municipalities regarding the participants and the costs are correct. This is described in more detail in part 4 of evidence 74, in particular sections 4.5-4.7. The National Board of Health and Welfare requests excerpts from the general ledgers, based on a risk-based selection among participating municipalities, to verify the reported staffing costs and ensure that the accounting is correct. The National Board of Health and Welfare also performs spot checks of wage specification of participants from the municipalities, in order to control that the reported information is correct and that the participants are actually employed in elderly care. Finally, the National Board of Health and Welfare performs on-the-spot checks for detailed controls of the information reported by municipalities (see evidence 75 for the check list used for these on-the-spot checks).

In total, 26 830 employees in elderly care have started a training during 2020-2023. The National Board of Health and Welfare can prove, on the basis of complete data pertaining to each individual, that at least 7985 of these employees have started a training in the framework of the elderly care initiative.

The pieces of evidence 67-70 are reports from the National Board of Health and Welfare (*Socialstyrelsen*). The reports provide detailed statistics on the results for each of the years 2020-2023 of the Elderly Care initiative as a whole, including the parts not included in the RRP.

The Council Implementing Decision required 6500 staff members to have started training (i.e. 8000 starting from a baseline of 1500). Sweden has presented evidence for 6485 staff members having started training. Whilst this constitutes a minimal numerical deviation of 0.2% from the requirement of the Council Implementing Decision, the overall objective of this target is considered met notwithstanding this minor deviation. On this basis, it is considered that this constitutive element of the target is satisfactorily fulfilled.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Preliminary Assessment – M/T specific section:

Non-repayable support

Number and name of the Milestone: 36 – Entry into force of legislation regulating the professional title of nursing assistant

Related Measure: C.R1 Regulating the professional title of nursing assistant ("undersköterska")

Qualitative Indicator: Provision in the legislation indicating the entry into force as well as publication of the legislation in the Swedish Code of Statues (SFS)

Time: Q3 2023

1. Context:

This reform aims to address the lack of national legal provisions with respect to the skills and/or education required for a recognised nursing assistant title. This measure consists in legislative amendments to put such provisions into place.

Milestone 36 concerns the entry into force of legislation regulating the qualifications required for the use of the title of nursing assistant.

Milestone 36 is the only milestone of this reform.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document.	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
2	Act amending the Patient Safety Act (2010:659), no. SFS 2021:739, issued on 23 June 2021, published in the Swedish Code of Statutes on 30 June 2021, entered into force on 1 July 2023.	This Act, adopted by the Swedish Parliament (*Riksdagen*), amends the Patient Safety Act, introducing notably the required qualifications for a person to legally use the professional title of Nursing Assistant. https://svenskforfattningssamling.se/sites/default/files/sfs/2021-06/SFS2021-739.pdf

3. Analysis:

The justification and substantiating evidence provided by the Swedish authorities cover all constitutive elements of the milestone.

Entry into force of legislation regulating the qualifications required for the use of the professional title of nursing assistant. Furthermore**, this measure consists in legislative amendments to put such provisions into place.**

The Act amending the Patient Safety Act (2010:659), no. SFS 2021:739, hereinafter “the amended patient safety act” was published in the Swedish Code of Statutes on 30 June 2021. The amending act entered into force on 1 July 2023, as set out in point 1 on page 2 of the act (evidence 2).

Chapter 4, paragraph 5a of the amended patient safety act stipulates that a certificate giving the right to use the professional title of Nursing assistant (*Undersköterska)* can be given to any person that has either (1) an education focussed on health care and care either from upper secondary school or from municipal vocational training, or (2) has acquired the competence that corresponds to what is achieved after having gone through such education or training that is referred to under point (1).

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Preliminary Assessment – M/T specific section:

Non-repayable support

Number and name of the Milestone: 37 – Entry into force of legislation to increase by one year pension system age limits

Related Measure: C.R2 Adjusted age limits

Qualitative Indicator: Provision in the legislation indicating the entry into force as well as publication of the legislation in the Swedish Code of Statutes (SFS).

Time: Q4 2023

1. Context:

The objective of this reform is to increase the average pension age. The measure consists in amending the legislation that governs the age limits that apply to the pension system.

Milestone 37 concerns the entry into force of legislation increasing pension system age limits by one year.

Milestone 37 is the first of two milestones of this reform. It is followed by milestone 38, which covers linking the pension age limits to a benchmark age which is aligned with the average life expectancy.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document.	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
2	Act amending the Income Tax law (1999:1229), no. SFS 2022:886, issued on 9 June 2022, published in the Swedish Code of Statutes on 16 June 2022, entered into force on 1 January 2023.	This Act, adopted by the Swedish Parliament (*Riksdagen*), amends the Income tax law, specifying that the lower age limit at which a person can benefit from the increased income tax basic tax-free allowance is raised from 65 to 66 years of age. Points 1 and 2 of the final provisions specify that the law enters into force on 1 January 2023 and applies to taxations years beginning after 31 December 2022. https://svenskforfattningssamling.se/sites/default/files/sfs/2022-06/SFS2022-886.pdf
3	Act amending the Social Insurance Code (2010:110), no. SFS 2022:878, issued on 9 June 2022, published in the Swedish Code of Statutes on 16 June	This Act, adopted by the Swedish Parliament (*Riksdagen*), amends the Social Insurance Code, notably (1) raising the lowest age at which pension benefits can be had from 62 to 63 years of age; (2) raising the age limit for benefitting from the basic pension protection from 65 to 66 years of age; (3) raising by one year the pension related age limits in various parts of the social insurance and benefits systems. Points 1, 2 and 4 of the final provisions specify that the law enters into force on 1 December

	2022, entered into force on 1 December 2022.	2022, that the law applies for the first time to benefits relating to a time period beginning as of 1 January 2023, and that the law applies to persons that do not reach the age limits before 1 January 2023 https://svenskforfattningssamling.se/sites/default/files/sfs/2022-06/SFS2022-878.pdf
4	Act amending the Act concerning Support and Service for Persons with Certain Functional Impairments (1993:387), no. SFS 2022:880, issued on 9 June 2022, published in the Swedish Code of Statutes on 16 June 2022, entered into force on 1 January 2023.	This Act, adopted by the Swedish Parliament (*Riksdagen*), amends the Act concerning Support and Service for Persons with Certain Functional Impairments, raising the applicable age limit in the context of such support and service from 65 to 66 years of age. Points 1 and 2 of the final provisions specify that the law enters into force on 1 January 2023 and that the law applies to persons who have not turned 65 before the entry into force. https://svenskforfattningssamling.se/sites/default/files/sfs/2022-06/SFS2022-880.pdf
5	Act amending the Unemployment Benefits Act (1997:238), no. SFS 2022:882, issued on 9 June 2022, published in the Swedish Code of Statutes on 16 June 2022, entered into force on 1 January 2023.	This Act, adopted by the Swedish Parliament (*Riksdagen*), amends the Unemployment Benefits Act, raising the applicable age limit in the context of receiving such benefits from 65 to 66 years of age. Points 1 and 2 of the final provisions specify that the law enters into force on 1 January 2023 and that the law applies to persons who have not turned 65 before the entry into force. https://svenskforfattningssamling.se/sites/default/files/sfs/2022-06/SFS2022-882.pdf
6	Act amending the Unemployment Insurance Funds Act (1997:239), no. SFS 2022:884, issued on 9 June 2022, published in the Swedish Code of Statutes on 16 June 2022, entered into force on 1 January 2023.	This Act, adopted by the Swedish Parliament (*Riksdagen*) amends the Unemployment Insurance Funds Act, raising the applicable age limit for a person to be member of such a fund from 65 to 66 years of age. Points 1 and 2 of the final provisions specify that the law enters into force on 1 January 2023 and that the law applies to persons who have not turned 65 before the entry into force. https://svenskforfattningssamling.se/sites/default/files/sfs/2022-06/SFS2022-884.pdf
7	Act amending the Social Insurance Contributions Act (2000:980), no. SFS 2022:888, issued on	This Act, adopted by the Swedish Parliament (*Riksdagen*) amends the Social Insurance Contributions Act, raising the applicable age limit in the context of the payment of social insurance contributions from 65 to 66 years of age. Points 1-4 of the final provisions specify that the law enters into force on 1 January

	9 June 2022, published in the Swedish Code of Statutes on 16 June 2022, entered into force on 1 January 2023.	2023 and that the law applies to benefits paid/income received/taxable years beginning after 31 December 2022. https://svenskforfattningssamling.se/sites/default/files/sfs/2022-06/SFS2022-888.pdf
8	Act amending the Act on certain municipal authorisations (2009:47), no. SFS 2022:890, issued on 9 June 2022, published in the Swedish Code of Statutes on 16 June 2022, entered into force on 1 January 2023.	This Act, adopted by the Swedish Parliament (*Riksdagen*) amends the Act on certain municipal authorisations, raising the applicable age limit in the context of the provision of municipal services from 68 to 69 years of age. Points 1 and 2 of the final provisions specify that the law enters into force on 1 January 2023 and that the law applies persons who have not turned 68 before the entry into force. https://svenskforfattningssamling.se/sites/default/files/sfs/2022-06/SFS2022-890.pdf
9	Act amending the Act on the implementation of the Social Insurance Code (2010:11), no. SFS 2022:891, issued on 9 June 2022, published in the Swedish Code of Statutes on 16 June 2022, entered into force on 1 January 2023.	This Act, adopted by the Swedish Parliament (*Riksdagen*) amends the Act on the implementation of the Social Insurance Code, raising the applicable age limit in the context of widow's pensions from 65 to 66 years of age. Points 1 and 2 of the final provisions specify that the law enters into force on 1 January 2023 and that the law applies to persons who have not turned 65 before the entry into force. https://svenskforfattningssamling.se/sites/default/files/sfs/2022-06/SFS2022-891.pdf
10	Act amending the Act on civics education for certain newly arrived immigrants (2013:156), no. SFS 2022:893, issued on 9 June 2022, published in the Swedish Code of Statutes on 16 June 2022, entered into force on 1 January 2023.	This Act, adopted by the Swedish Parliament (*Riksdagen*) amends the Act on civics education for certain newly arrived immigrants, raising the applicable age limit in the context of the provision of civics education for certain newly arrived immigrants from 65 to 66 years of age. Points 1 and 2 of the final provisions specify that the law enters into force on 1 January 2023 and that the law applies to persons who have not turned 65 before the entry into force. https://svenskforfattningssamling.se/sites/default/files/sfs/2022-06/SFS2022-893.pdf
11	Act amending the Act on the responsibility for establishment	This Act, adopted by the Swedish Parliament (*Riksdagen*) amends the Act on the responsibility for providing establishment efforts for certain newly arrived immigrants, raising the applicable age limit in the context of the provision of such efforts from 65 to 66

	efforts for certain newly arrived immigrants (2017:584), no. SFS 2022:895, issued on 9 June 2022, published in the Swedish Code of Statutes on 16 June 2022, entered into force on 1 January 2023.	years of age. Points 1 and 2 of the final provisions specify that the law enters into force on 1 January 2023 and that the law applies to persons who have not turned 65 before the entry into force. https://svenskforfattningssamling.se/sites/default/files/sfs/2022-06/SFS2022-895.pdf

3. Analysis:

The justification and substantiating evidence provided by the Swedish authorities cover all constitutive elements of the milestone.

Entry into force of legislation increasing pension system age limits by one year.

The following amending Acts entered into force on 1 January 2023, as set out in their respective final provisions, and increase age limits pertinent to the pension system by one year in the respective following provisions (from 65 years of age to 66 years of age unless otherwise specified):

- Act amending the Income Tax law, no. SFS 2022:886 (evidence 2)
    - Chapter 12, paragraph 36
    - Chapter 63, paragraph 3a
- Act amending the Act concerning Support and Service for Persons with Certain Functional Impairments, no. SFS 2022:880 (evidence 4)
    - Paragraph 9b
- Act amending the Unemployment Benefits Act, no. SFS 2022:882 (evidence 5)
    - Paragraph 22
- Act amending the Unemployment Insurance Funds Act, no. SFS 2022:884 (evidence 6)
    - Paragraphs 34 and 36
- Act amending the Social Insurance Contributions Act, no. SFS 2022:888 (evidence 7)
    - Chapter 2, paragraph 27
    - Chapter 3, paragraphs 15 and 18
- Act amending the Act on certain municipal authorisations, no. SFS 2022:890 (evidence 8)
    - Chapter 2, paragraph 7, raising the applicable age limit in the context of the provision of municipal services from 68 to 69 years of age
- Act amending the Act on the implementation of the Social Insurance Code, no. SFS 2022:891 (evidence 9)
    - Chapter 7, paragraphs 23, 30 and 32
- Act amending the Act on civics education for certain newly arrived immigrants, no. SFS 2022:893 (evidence 10)
    - Paragraphs 1a and 2
- Act amending the Act on the responsibility for establishment efforts for certain newly arrived immigrants, no. SFS 2022:895 (evidence 11)
    - Paragraphs 1 and 2

The following Act entered into force on 1 December 2022, as set out in its final provisions, and raise the age limits pertinent to the pension system in the respective following provisions from 65 years of age to 66 years of age unless otherwise specified:

- Act amending the Social Insurance Code, no. SFS 2022:878 (evidence 3)
    - Chapter 26, paragraphs 17, 18, 22a, 22b and 25
    - Chapter 27, paragraphs 36 and 37
    - Chapter 28a, paragraph 7
    - Chapter 31, paragraph 4
    - Chapter 33, paragraph 16
    - Chapter 33, paragraph 17 (from 60 to 61)
    - Chapter 35, paragraphs 4, 12, 13 and 15 (from 64 to 65)
    - Chapter 41, paragraphs 5 and 6
    - Chapter 46, paragraph 8 (from 70 to 71)
    - Chapter 50, paragraph 4
    - Chapter 51, paragraphs 8 and 10
    - Chapter 52, paragraph 10
    - Chapter 56, paragraph 3 (from 62 to 63)
    - Chapter 56, paragraphs 4a, 5 and 8
    - Chapter 58, paragraph 11 (from 64 to 65)
    - Chapter 60, paragraphs 18, 30, 41 and 52 (from 64 to 65)
    - Chapter 62, paragraphs 12, 13, 15 and 16 (from 61 to 62)
    - Chapter 62, paragraph 17 (from 65 to 66, 61 to 62, 64 to 65 respectively)
    - Chapter 62, paragraph 38 (from 70 to 71)
    - Chapter 62, paragraph 44
    - Chapter 67, paragraphs 4 and 13
    - Chapter 67, paragraphs 8 and 11 (from 64 to 65)
    - Chapter 67, paragraphs 20a and 20b (particular adaptations for those born before the year 1953, for those born in the period 1954-1957 and for those born in 1958 or later)
    - Chapter 74, paragraph 7
    - Chapter 74 a, paragraphs 7, 8 and 12
    - Chapter 77, paragraph 18
    - Chapter 81, paragraphs 4 and 7 (from 64 to 65)
    - Chapter 82, paragraphs 1, 4, 6, 8, 14 and 21
    - Chapter 82, paragraphs 7, 16 and 20 (from 64 to 65)
    - Chapter 84, paragraphs 6 and 16
    - Chapter 101, paragraph 6
    - Chapter 102, paragraphs 16a, 18, 22, 25a and 29
    - Chapter 103c, paragraph 8

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Preliminary Assessment – M/T specific section:

Non-repayable support

Number and name of the Milestone: 38 – Amendments of social security system legislation and the income tax law, linking the pension age limits to a benchmark age that is aligned with average life expectancy

Related Measure: C.R2 Adjusted age limits

Qualitative Indicator: (1) Provision in the legislation pertaining to the social security system indicating the entry into force, as well as publication of the legislation in the Swedish Code of Statutes (SFS), and (2) date of adoption by the Swedish Parliament of the amendment of the income tax legislation

Time: Q1 2026

1. Context:

The objective of this reform is to increase the average pension age. The measure consists in amending the legislation that governs the age limits that apply to the pension system.

Milestone 38 concerns the entry into force of legislation linking the pension age limits to a benchmark age that is aligned with the average life expectancy.

Milestone 38 is the second and last one of this reform. The first one is milestone 37, which was related to adjusting the pension system relevant age limits in social security and tax by one year.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document.	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
2	Act amending the Income Tax law (1999:1229), no. SFS 2022:887, issued on 9 June 2022, published in the Swedish Code of Statutes on 16 June 2022, entered into force on 1 January 2026 and applies for the first time to taxation years starting after 31 December 2025.	This Act, adopted by the Swedish Parliament (*Riksdagen*), amends the Income tax law, raising from 66 to 67 the age at which the lower level of deduction of the self-employed person's social security contributions should apply, as well as the age at which the increased level of the basic tax deductions should apply.

3	Act amending the Act amending the Income Tax law (2022:887), no. SFS 2024:407, issued on 9 June 2022, published in the Swedish Code of Statutes on 16 June 2022, entered into force on 29 May 2024.	This Act, adopted by the Swedish Parliament (*Riksdagen*), amends the Act amending the Income tax law (law 2022:887, evidence 2), revising the final provisions so that the amendment of the provision in Ch. 63, para 3a does not enter into force on 1 January 2026 (as set out in the amending law 2022:887) but instead enters into force on 1 January 2027 and applies to taxations years beginning after 31 December 2026.
4	Act amending the Social Insurance Code (2010:110), no. SFS 2022:879, issued on 9 June 2022, published in the Swedish Code of Statutes on 16 June 2022, entered into force on 1 December 2025.	This Act, adopted by the Swedish Parliament (*Riksdagen*), amends the Social Insurance Code, notably linking several age limits at which pension related benefits can be received to the benchmark age ("*riktåldern*").
5	Act amending the Act concerning Support and Service for Persons with Certain Functional Impairments (1993:387), no. SFS 2022:881, issued on 9 June 2022, published in the Swedish Code of Statutes on 16 June 2022, entered into force on 1 January 2026.	This Act, adopted by the Swedish Parliament (*Riksdagen*), amends the Act concerning Support and Service for Persons with Certain Functional Impairments, linking the applicable age limit in the context of such support and service benefits to the benchmark age ("*riktåldern*").
6	Act amending the Unemployment Benefits Act (1997:238), no. SFS 2022:883, issued on 9 June 2022, published in the Swedish Code of Statutes on 16 June 2022, entered into force on 1 January 2026.	This Act, adopted by the Swedish Parliament (*Riksdagen*), amends the Unemployment Benefits Act linking the applicable age limit in the context of of receiving such benefits to the benchmark age ("*riktåldern*").
7	Act amending the Unemployment Insurance Funds Act (1997:239), no. SFS 2022:885, issued on 9 June 2022, published in the Swedish Code of Statutes on 16 June 2022, entered into force on 1 January 2026.	This Act, adopted by the Swedish Parliament (*Riksdagen*) amends the Unemployment Insurance Funds Act, linking the applicable age limit for a person to be member of such a fund to the benchmark age ("*riktåldern*").
8	Act amending the Social Insurance Contributions Act (2000:980), no. SFS 2022:889, issued on 9 June 2022, published in the Swedish Code of Statutes on 16 June 2022, entered into force on 1 January 2026.	This Act, adopted by the Swedish Parliament (*Riksdagen*) amends the Social Insurance Contributions Act, raising the applicable age limit in the context of the payment of social insurance contributions from 66 to 67 years of age.
9	Act amending the Act on the	This Act, adopted by the Swedish Parliament

	implementation of the Social Insurance Code (2010:11), no. SFS 2022:892, issued on 9 June 2022, published in the Swedish Code of Statutes on 16 June 2022, entered into force on 1 January 2026.	(*Riksdagen*) amends the Act on the implementation of the Social Insurance Code, linking the applicable age limit in the context of widow's pensions to the benchmark age ("*riktåldern*").
10	Act amending the Act on civics education for certain newly arrived immigrants (2013:156), no. SFS 2022:894, issued on 9 June 2022, published in the Swedish Code of Statutes on 16 June 2022, entered into force on 1 January 2026.	This Act, adopted by the Swedish Parliament (*Riksdagen*) amends the Act on civics education for certain newly arrived immigrants, linking the applicable age limit in the context of the provision of civics education for certain newly arrived immigrants to the benchmark age ("*riktåldern*").
11	Act amending the Act on the responsibility for establishment efforts for certain newly arrived immigrants (2017:584), no. SFS 2022:896, issued on 9 June 2022, published in the Swedish Code of Statutes on 16 June 2022, entered into force on 1 January 2026.	This Act, adopted by the Swedish Parliament (*Riksdagen*) amends the Act on the responsibility for providing establishment efforts for certain newly arrived immigrants, linking the applicable age limit in the context of the provision of such efforts to the benchmark age ("*riktåldern*").
12	Written communication rskr_202324__214 from the *Riksdag* to the Government on 29 May 2024 published on the same day by the *Riksdag*.	This Written Communication from the Swedish Parliament (*Riksdagen)* to the Government formally notifies that the Act amending the Act amending the Income Tax law (2022:887), no. SFS 2024:407, has been adopted and published by the Parliament on 29 May 2024 Riksdagsskrivelse 2023/24:214.

3. Analysis:

The justification and substantiating evidence provided by the Swedish authorities cover all constitutive elements of the milestone.

Entry into force of legislation linking the pension age limits to a benchmark age that is aligned with the average life expectancy. This entails the entry into force of amendments of pieces of legislation of the social security system, as well as the adoption by the Swedish Parliament of amendments to the income tax law.

The Act amending the Social Insurance Code (2010:110), no. SFS 2022:879, (hereinafter referred to as the "Act SFS 2022:879") (evidence 4) was published in the Code of Statutes of Sweden on 16 June 2022. According to Points 1, 2 and 4 of its final provisions, Act SFS 2022:879 entered into force on 1 December 2025. Furthermore, as specified by the aforementioned points, Act SFS 2022:879 applies for the first time to benefits relating to a time period beginning as of 1 January 2026. The amended law provisions do not apply to individuals who reach the respective age limits before 1 January 2026, nor to insurance cases that relate to the time period before 1 January 2026, nor to the calculation of survivor's pension relating to deaths occurring before 12 January 2026.

The following provisions in the Act amending the Social Insurance Code, no. SFS 2022:879 link the pension system relevant age limits to the benchmark age (the benchmark age is defined annually through a government regulation, so it changes over time to adapt to the evolving average life expectancy and the methodology to calculate it is defined in the Social insurance code (SFS 2010:110) chapter 2, paragraph 10a-d):

- Ch. 26, paragraphs 17, 18, 22a, 22b and 25
- Ch, 27, paragraph 36
- Ch. 28a, paragraph 7
- Ch. 31, paragraph 4
- Ch. 33, paragraphs 16 and 17
- Ch. 35, paragraphs 4, 12, 13 and 15
- Ch. 41, paragraphs 5 and 6
- Ch 46, paragraph 8
- Ch. 50, paragraph 4
- Ch. 51, paragraphs 8 and 10
- Ch. 52, paragraph 10
- Ch. 56, paragraphs 3, 4a, 5 and 8
- Ch. 58, paragraph 11
- Ch. 60, paragraphs 18, 30, 41 and 52
- Ch. 62, paragraphs 12, 13, 15, 16, 17, 38 and 44
- Ch. 67, paragraphs 4, 8, 11, 13 and 20b
- Ch. 74, paragraph 7
- Ch. 74 a, paragraphs 7, 8 and 12
- Ch. 77, paragraph 18
- Ch. 81, paragraphs 4, 7
- Ch. 82, paragraphs 1, 4, 6, 7, 8, 14, 16, 20 and 21
- Ch. 84, paragraphs 6 and 16
- Ch. 101, paragraph 6
- Ch. 102, paragraphs 16a, 18, 22, 22a 25a and 29
- Ch. 103c, paragraph 8

Points 1 and 2 of the final provisions of the Act amending the Act concerning Support and Service for Persons with Certain Functional Impairments, no. SFS 2022:880 (evidence 5) specify that the law enters into force on 1 January 2026 and that the amended law provisions do not apply to persons who turned 66 before the entry into force.

The following provision in the amending Act links the pension system relevant age limits to the benchmark ages:

- Paragraph 9b

Points 1 and 2 of the final provisions of the Act amending the Unemployment Benefits Act, no. SFS 2022:882 (evidence 6) specify that the law enters into force on 1 January 2026 and that the amended law provisions do not apply to persons who turned 66 before the entry into force.

The following provision in the amending Act links the pension system relevant age limits to the benchmark age:

- Paragraph 22

Points 1 and 2 of the final provisions of the Act amending the Unemployment Insurance Funds Act, no. SFS 2022:885 (evidence 7) specify that the law enters into force on 1 January 2026 and that the amended law provisions do not apply to persons who turned 66 before the entry into force.

The following provisions in the amending Act link the pension system relevant age limits to the benchmark age:

- Paragraphs 34 and 36

Points 1 and 2 of the final provisions of the Act amending the Act on the implementation of the Social Insurance Code, no. SFS 2022:892 (evidence 9) specify that the law enters into force on 1 January 2026 and that the amended law provisions do not apply to persons who turned 66 before the entry into force.

The following provisions in the amending Act link the pension system relevant age limits to the benchmark age:

- Chapter 7, paragraphs 23, 30 and 32

Points 1 and 2 of the final provisions of the Act amending the Act on civics education for certain newly arrived immigrants, no. SFS 2022:894 (evidence 10) specify that the law enters into force on 1 January 2026 and that the amended law provisions do not apply to persons who turned 66 before the entry into force.

The following provisions in the amending Act link the pension system relevant age limits to the benchmark age:

- Paragraphs 1a and 2

Points 1 and 2 of the final provisions of the Act amending the Act on the responsibility for establishment efforts for certain newly arrived immigrants, no. SFS 2022:896 (evidence 11) specify that the law enters into force on 1 January 2026 and that the amended law provisions do not apply to persons who turned 66 before the entry into force.

The following provisions in the amending Act link the pension system relevant age limits to the benchmark age:

- Paragraphs 1 and 2

Points 1-4 of the final provisions In the Act amending the Social Insurance Contributions Act, no. SFS 2022:887 (evidence 8) specify that the law enters into force on 1 January 2026 and that the law applies to benefits paid/income received/taxable years beginning after 31 December 2025.

The following provisions in the amending act reflect the raising of the pension age from 66 to 67 (which corresponds nominally to the current benchmark age, as determined according to the methodology described above):

- Chapter 2, paragraph 27
- Chapter 3, paragraphs 15 and 18

Points 1 and 2 of the final provisions of the Act amending the Income Tax law no. SFS 2022:887 (evidence 2) first specified that the law enters into force on 1 January 2026 and applies to taxations years beginning after 31 December 2025. The provisions in the Income Tax law that are amended

are Chapter 12, paragraph 36 and Chapter 63, paragraph 3a and reflect the raising of the pension age from 66 to 67 (which corresponds nominally to the benchmark age).

However, the amended provision in Chapter 63, paragraph 3a, was subsequently itself amended to apply one year later. The Act no. SFS 2024:407 (evidence 3), adopted by the Swedish Parliament on 29 May 2024 (evidence 12) amends the Act amending the Income Tax Law no. SFS 2024:887 (evidence 2). Since all the amending Acts referred to above modify legal instruments that form an integral part of the social security system — by reason of their subject matter concerning benefits, contributions, and support schemes within a coordinated social protection framework — their entry into force entails the amendment of pieces of legislation belonging to such system.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Preliminary Assessment – M/T specific section:

Non-repayable support

Number and name of the Milestone: 39 – Entry into force of legislation establishing additional measures to combat money laundering and terrorism financing

Related Measure: C.R3 Additional measures to combat money laundering and terrorism financing

Qualitative Indicator: Provision in the legislation indicating the entry into force of legislation establishing additional measures to combat money laundering and financing of terrorism

Time: Q4 2023

1. Context:

This reform consists in the entry into force of legislation establishing additional measures to combat money laundering and terrorist financing.

Milestone 39 is the only milestone of this reform.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document.	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
2	Act amending the Act (2017: 630) on Measures against Money Laundering and Terrorism Financing, no. SFS 2022:1537, issued on 24 November 2022, published in the Swedish Code of Statutes on 29 November 2022, and entered into force on 1 January 2023.	This Act, adopted by the Swedish Parliament (*Riksdagen)*, amends the Measures against Money Laundering and Terrorism Financing, introducing stronger measures against money laundering and terrorism financing.
3	Act amending the Act (2017: 631) on the Registration of Beneficial Owners, no. SFS 2022-1539, issued on 24 November 2022, published in the Swedish Code of Statutes on 29 November 2022, and entered into force on 1 January 2023.	This Act, adopted by the Swedish Parliament (*Riksdagen)*, amends the Measures against Money Laundering and Terrorism Financing, introducing stronger measures against money laundering and terrorism financing
4	Act amending the Public Access to Information and Secrecy Act (2009: 400), no. SFS 2022:1538, issued on 24 November 2022, published in the Swedish Code of Statutes on 29 November 2022, and entered into force on 1 January 2023.	This Act, adopted by the Swedish Parliament (*Riksdagen)*, amends the Public Access to Information and Secrecy Act, introducing stronger measures against money laundering and terrorism financing.

3. Analysis:

The justification and substantiating evidence provided by the Swedish authorities cover all constitutive elements of the milestone.

Entry into force of legislation establishing additional measures to combat money laundering and terrorism financing.

The Act amending the Act (2017: 630) on Measures against Money Laundering and Terrorism Financing (evidence 2) was published in the Code of Statutes on 29 November 2022 and entered into force on 1 January 2023, as set out in the final provision of the Act. It entails notably, in Chapter 4, paragraph 6, new requirements on legal and physical persons, including clearing houses, to share with the police without delay whatever information the police deem necessary in the context of an inquiry regarding money-laundering or terrorism financing.

The Act amending the Act (2017: 631) on the Registration of Beneficial Owners (evidence 3) was published in the Swedish Code of Statutes on 29 November 2022, entered into force on 1 January 2023, as set out in the final provision of the Act, and entails notably a stricter obligation on legal persons to notify to the Swedish Business Registration Office the identity of beneficial owners, by requiring that the notification is done concurrently with the registration of the business itself.

The Act amending the Public Access to Information and Secrecy Act (2009: 400) (evidence 4) was published in the Swedish Code of Statutes on 29 November 2022 and entered into force on 1 January 2023, as set out in the final provision of the Act. It entails notably, in chapter 10 paragraph 5c, possibilities for authorities to exchange information, even though it is confidential, in the context of measures related to fighting money laundering and the financing of terrorism.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Preliminary Assessment – M/T specific section:

Non-repayable support

Number and name of the Target: 51 – T2: Payment of support for new dwellings

Related Measure: E.I1 Investment aid for rental and student housing

Quantitative Indicator: New dwellings

Baseline: 1 500

Target: 4 800

Time: Q4 2023

1. Context:

The measure is an investment consisting of increasing the supply of new rental dwellings with a lower rent relative to new non-subsidised housing.

Target 51 requires that 4 800 new rental dwellings are constructed to offer lower rent relative to new non-subsidised housing by Q4 2023.

Target 51 is the second step in the implementation of the investment following the successful implementation of target 50 in the first payment request, which required 1 500 new dwellings to be built by Q4 2022. Target 51 will be followed by target 58 – related to the scaled-up measure F.I2 in the REPowerEU Chapter – which adds another 1 920 new dwellings by Q4 2025.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document.	Summary document duly justifying how the target (including the constitutive elements) was satisfactorily fulfilled.
2	List of decisions.	Decisions by the County Administrative Boards setting out eligibility and on payment of investment aid.
3	Summary statistics on the projects having received investment aid in 2023.	Statistics obtained from the statistical system and the 'Svanen' tool of the National Board of Housing, Building and Planning, which in turn is based on information reported in the administrative management system "Bofinc" owned by the National Board of Housing, Building and Planning and used by the county administrative boards. This includes a list of the new completed dwellings with specific information on: the case number; the date of payment, the location (address/county/municipality); the property designation; the rent level and rent for comparable non-subsidized dwellings.
4	Ordinance on State investment aid for rental and student housing, no. SFS	The Ordinance is adopted by the Swedish Government.

	2016:881, published in the Swedish Code of Statutes on 29 September 2016 and entered into force on 1 January 2017.	
5	Boverket's guidance on implementing the investment aid (BFS 2016:17).	The National Board of Housing, Building and Planning's regulations and general advice on state investment aid for rental housing and student housing (BFS 2016:17) published on 20 December 2016.
6-21	Certificates of completion.	Certificates of completion issued by the relevant municipality for each of the 63 projects covered by the target.

3. Analysis:

The justification and substantiating evidence provided by the Swedish authorities cover all constitutive elements of the target.

Statistics on the total payments and number of dwellings delivered that fulfil the conditions to ensure that the target group is reached, namely, the investment aid is conditional on a maximum rent whereas the landlord may not refuse a prospective tenant to rent a subsidised dwelling on the ground that the income is too low, as long as the person or household is in a position to pay the rent. The data on rents shall be compared to non-subsidised new dwellings.

Statistics from the National Board of Housing, Building and Planning (extracted on 29 August 2025) in the form of an excel spreadsheet (evidence 3) have been provided for 63 projects, as well as certificates of completion issued by the relevant municipality (evidence 6-21). Each project consists of a building made up of a specific number of dwellings. The statistics confirm that a total of 2 787 additional dwellings belonging to the 63 projects have received funding, thus taking the total amount of funded dwellings to 4 804. Additional information is provided covering the dates on which payments were made. Data on actual rents and those of comparable new non-subsidised rents, which were calculated using data from Statistics Sweden, have also been provided (Evidence 3), confirming actual rents to be lower than non-subsidised new dwellings.

In line with the description of the target, **the investment is conditional on a maximum rent.** Section 8 (3) of the Ordinance on State investment aid for rental housing and student housing (2016:881) (*hereinafter referred to as "the Ordinance"*) (evidence 4) defines a maximum rent per square metre of usable area per year that a landlord can charge. The exact amount of the maximum rent depends on the location of the dwelling. Evidence 3 contains data on the rent (per square metre) for each project confirming that the rents are within the threshold of the maximum rent allowed as per the Ordinance. The Ordinance constitutes the legal basis for granting financial aid to the dwellings.

In line with the description of the target, **the landlord may not refuse a prospective tenant to rent a subsidised dwelling on the ground that the income is too low, as long as the person is in a position to pay the rent.** Section 9 (2) of the Ordinance (evidence 4) stipulates that the beneficiary of the subsidies must "make reasonable demands on the housing applicant's finances and not apply other income requirements than those resulting from regulations issued by the National Board of Board of Housing, Building and Planning pursuant to Section 29 of the Ordinance." In accordance with Section 29 of the Ordinance, the National Board of Housing, Building and Planning issued "The National Board of Housing, Building and Planning's regulations and general advice on state investment aid for rental housing and student housing (BFS 2016:17)" (*hereinafter referred to as "BFS (2016:17)"*) (evidence 5). Section 5 of BFS (2016:17) states that the beneficiary of state investment aid shall

make reasonable demands regarding the applicant's finances and that it is sufficient if it is likely that the potential tenant will be able to pay the rent following a calculation of what the household has left to subsist after rent has been paid. It also states that the Swedish Enforcement Authority's "protected amount" may be used to determine the amount of money left after rent that is necessary to subsist. The decisions by the County Administrative Boards (evidence 2) outline that the aid is granted conditional on compliance with the rules set out in the Ordinance. The County Administrative Boards perform ex-ante checks to ensure that reasonable requirements regarding the housing applicant's finances are met. At payment stage, the beneficiary must show its requirements for assigning housing to prospective tenants including any income requirements. After payment, the conditions remain applicable for 15 years and remain subject to ex-post supervision by the County Administrative Board.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Preliminary Assessment – M/T specific section:

Non-repayable support

Number and name of the Milestone: 53 – Entry into force of legislation revising the regulatory framework for building permits

Related Measure: E.R2 Revision of the regulatory framework for building permits

Qualitative Indicator: Provision in the legislation revising the regulatory framework for building permits indicating the entry into force

Time: Q4 2025

1. Context:

The objective of the reform is to make the regulatory framework for building permits more efficient, for example by increasing the number of measures that can be carried out without the need for a building permit. This reform consists in the adoption of legislation to revise the regulatory framework for building permits.

Milestone 53 concerns the entry into force of legislation revising the regulatory framework for building permits.

Milestone 53 is the only milestone of this reform.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document.	Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.
2	Act amending the Planning and Building Act (2010: 900), no. SFS 2025:974, published in the Swedish Code of Statues on 4 November 2025, entered into force on 1 December 2025.	The Act, adopted by the Swedish Parliament (*Riksdagen*), introduces a comprehensive reform of the Planning and Building Act (2010:900) to simplify and modernise the building permit system. It revises provisions on building permits, detailed plans, and start permits, expands exemptions for minor construction, and clarifies key definitions and procedures.
3	Government Bill 2024/25:169: A new framework for building permits, dated 22 May 2025, Stockholm.	The government bill sets out the principal contents of the Bill and the proposed amendments to legislative texts.

3. Analysis:

The justification and substantiating evidence provided by the Swedish authorities cover all constitutive elements of the milestone.

Entry into force of legislation revising the regulatory framework for building permits and which shall facilitate further measures that can be carried out without the need for a building permit.

The Act amending the Planning and Building Act (2010:900), No. SFS 2025:974 (evidence 2) was published in the Swedish Code of Statutes on 4 November 2025. It entered into force on 1 December 2025, as indicated on page 33 of the Act (evidence 2). The amendments introduce a new Chapter 9 (Sections 3–113), which establishes a simpler and more efficient framework for building permits. More specifically, the provisions set out in Chapter 9, Sections 3-38 (pages 13 – 21) expand the range of measures that can be carried out without a building permit. Notably, the abolition of the permit requirement for attic conversations and façade changes for single-dwelling and two-dwelling buildings (including the installation of solar panels or roof windows), as well as the construction of complementary buildings and complementary residential buildings in areas not covered by a development plan. Evidence 3 (Government Bill 2024/25:169, Chapter 4, page 58) provides context and explains the changes relative to previous legislation.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Preliminary Assessment – M/T specific section:

Non-repayable support

Number and name of the Target: 58 – T3: Payment of support for new dwellings

Related Measure: F.I2 Investment aid for rental and student housing

Quantitative Indicator: New dwellings

Baseline: 4 800

Target: 6 720

Time: Q4 2025

1. Context:

The measure is a scale-up of investment 1: Investment aid for rental and student housing, under component 5: Investment for growth and housing. The measure consists of increasing the number of dwellings for rental and student housing.

Target 58 requires 6 720 new rental dwellings are constructed to offer lower rent relative to new non-subsidised housing by Q4 2025.

Target 58 is the final step of the investment following the implementation of target 51, which required 4 800 new dwellings to be built by Q4 2023 and the successful implementation of target 50 in the first payment request, which required 1 500 new dwellings to be built by Q4 2022.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document.	Summary document duly justifying how the target (including all the constitutive elements) has been satisfactorily fulfilled.
2	List of decisions.	Decisions by the County Administrative Boards setting out eligibility and on payment of investment aid
3	Summary statistics on the projects having received investment aid in 2023 and 2024.	Statistics obtained from the statistical system and the 'Svanen' tool of the National Board of Housing, Building and Planning, which in turn is based on information reported in the administrative management system "Bofinc" owned by the National Board of Housing, Building and Planning and used by the county administrative boards. This includes a list of the new completed dwellings with specific information on: the case number; the date of payment, the location (address/county/municipality); the property designation; the rent level and rent for comparable non-subsidized dwellings.

4	Ordinance on State investment aid for rental and student housing, no. SFS 2016:881, published in the Swedish Code of Statutes on 29 September 2016 and entered into force on 1 January 2017.	The Ordinance is adopted by the Swedish Government.
5	Boverket's guidance on implementing the investment aid (BFS 2016:17).	The National Board of Housing, Building and Planning's regulations and general advice on state investment aid for rental housing and student housing (BFS 2016:17) published on 20 December 2016.
6 - 21	Certificates of completion.	Certificates of completion issued by the relevant municipality for each of the 83 projects covered by the target.

3. Analysis:

The justification and substantiating evidence provided by the Swedish authorities cover all constitutive elements of the target.

Statistics on the total payments and number of dwellings delivered that fulfil the conditions to ensure that the target group is reached, namely, the investment aid is conditional on a maximum rent whereas the landlord may not refuse a prospective tenant to rent a subsidised dwelling on the ground that the income is too low, as long as the person or household is in a position to pay the rent. The data on rents shall be compared to non-subsidised new dwellings.

Statistics from the National Board of Housing, Building and Planning (extracted on 29 August 2025) in the form of an excel spreadsheet (evidence 3) have been provided for 83 projects, as well as certificates of completion issued by the relevant municipality (evidence 6-21). Each project consists of a building made up of a specific number of dwellings. The statistics confirm that a total of 4 593 additional dwellings belonging to the 83 projects have received funding, hence taking the total amount of funded dwellings to 9 397, thus exceeding the goal of Target 58 by 2 677 dwellings. Additional information is provided covering the dates on which payments were made. Data on actual rents and those of comparable new non-subsidised rents, which were calculated using data from Statistics Sweden, have also been provided (evidence 3), confirming actual rents to be lower than non-subsidised new dwellings.

In line with the description of the target, **the investment is conditional on a maximum rent.** Section 8 (3) of the Ordinance on State investment aid for rental housing and student housing (2016:881) (*hereinafter referred to as "the Ordinance*") (evidence 4) defines a maximum rent per square metre of usable area per year that a landlord can charge. The exact amount of the maximum rent depends on the location of the dwelling. Evidence 3 contains data on the rent (per square metre) for each project confirming that the rents are within the threshold of the maximum rent allowed as per the Ordinance. The Ordinance constitutes the legal basis for granting financial aid to the dwellings.

In line with the description of the target, **the landlord may not refuse a prospective tenant to rent a subsidised dwelling on the ground that the income is too low, as long as the person is in a position to pay the rent.** Section 9 (2) of the Ordinance (evidence 4) stipulates that the beneficiary of the subsidies must "make reasonable demands on the housing applicant's finances and not apply other income requirements than those resulting from regulations issued by the National Board of Board of Housing, Building and Planning pursuant to Section 29 of the Ordinance." In accordance with Section

29 of the Ordinance, the National Board of Housing, Building and Planning issued "The National Board of Housing, Building and Planning's regulations and general advice on state investment aid for rental housing and student housing (BFS 2016:17)" (*hereinafter referred to as "BFS (2016:17)"*) (evidence 5). Section 5 of BFS (2016:17) states that the beneficiary of state investment aid shall make reasonable demands regarding the applicant's finances and that it is sufficient if it is likely that the potential tenant will be able to pay the rent following a calculation of what the household has left to subsist after rent has been paid. It also states that the Swedish Enforcement Authority's "protected amount" may be used to determine the amount of money left after rent that is necessary to subsist. The decisions by the County Administrative Boards (evidence 2) outline that the aid is granted conditional on compliance with the rules set out in the Ordinance. The County Administrative Boards perform ex-ante checks to ensure that reasonable requirements regarding the housing applicant's finances are met. At payment stage, the beneficiary must show its process and requirements for assigning housing to prospective tenants including any income requirements. After payment, the conditions remain applicable for 15 years and remain subject to ex-post supervision by the County Administrative Board.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Preliminary Assessment – M/T specific section:

Non-repayable support

Number and name of the Milestone: 59 – Entry into force of legislation to speed up the authorization process for electricity grid construction

Related Measure: F.R1 Speeding up the authorization process for electricity grid construction

Qualitative Indicator: Provision in the legislation indicating the entry into force of legislation speeding up the authorization process for electricity grid construction

Time: Q4 2024

1. Context:

The objective of this measure is to shorten the permitting process for electricity grid construction and to address domestic and cross-border bottlenecks in electricity transmission. The measure consists of legislation simplifying procedures pertaining to the construction of electricity network infrastructure.

Milestone 59 concerns the entry into force of legislation to shorten the permitting process for electricity grid construction.

Milestone 59 is the only milestone of this measure.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document.	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactory fulfilled.
2	Proposal for a clearer process for the permitting of electricity grids No. 2023/24:88, dated 14 March 2024, published on the Government's website on 19 March 2024.	This document details the proposed legislative amendments to the Environmental Code and the Electricity Code as compared to the original pieces of legislation. These proposed amendments correspond to those in the adopted Act amending the Electricity Code (evidence 3) and the Act amending the Environmental Code (evidence 4). The document is a legal source for interpretation of the acts. Publicly accessible at: https://www.regeringen.se/contentassets/57e7cabd45a54b61a2bb2c557717722a/en-tydligare-process-for-tillstandsprovning-av-elnat-prop.-20232488.pdf
3	Act amending the Electricity Code (1997:857), No. SFS 2024:338, issued on 30 May 2024, published in the Swedish Code of Statues on 1 June 2024, entered into force on 1 July 2024.	The Act is adopted by the Swedish Parliament (*Riksdagen*).
4	Act amending the Environmental	The Act is adopted by the Swedish Parliament

	Code, No. SFS 2024:421, issued on 3 June 2024, published in the Swedish Code of Statues on 5 June 2024, entered into force on 1 July 2024.	(*Riksdagen)*.
5	Ordinance amending the Ordinance (1998:1252) on area protection according to the Environmental Code, No. SFS 2025:33, issued on 30 January 2025, published in the Swedish Code of Statues on 1 February 2025, entered into force on 1 March 2025.	The Ordinance is adopted by the Swedish Government.
6	Ordinance amending the Ordinance (2021:808) on electricity grid concession, No. SFS 2025:34, issued on 30 January 2025, published in the Swedish Code of Statues on 1 February 2025, entered into force on 1 March 2025.	The Ordinance is adopted by the Swedish Government.

3. Analysis:

The justification and substantiating evidence provided by the Swedish authorities cover all constitutive elements of the milestone.

Entry into force of legislation

Footnote 1 on page 1 of the Act amending the Electricity Code, No. SFS 2024:338 (evidence 3*, hereinafter referred to as the "Act amending the Electricity Code"*), specifies that the act entered into force on 1 July 2024. Footnote 1 on page 1 of the Act amending the Environmental Code, No. SFS 2024:421 (evidence 4, *hereinafter referred to as the "Act amending the Environmental Code"*), specifies that the act entered into force on 1 July 2024.

On page 1 of the Ordinance amending the Ordinance (1998:1252) on area protection according to the Environmental Code, No. SFS 2025:33 (evidence 5, *hereinafter referred to as the "Amending Ordinance on area protection"),* it is specified that the Ordinance entered into force on 1 March 2025. On page 2 of the Ordinance amending the Ordinance (2021:808) on electricity grid concession, No. SFS 2025:34 (evidence 6, *hereinafter referred to as the "Amending Ordinance on grid concession"),* it is specified that the Ordinance entered into force on 1 March 2025.

that shall introduce (a) a simplified procedure for granting exemptions from local area protection during the permitting process for electricity grid construction (as currently described in Chapter 7, Sections 11-b and 13-18h of the Swedish Environmental Code), which shall enable the grant of these exemptions at shorter time frames and at earlier stages of the permitting process;

The Act amending the Environmental Code (evidence 4) amends Chapter 7, sections 11a (2) and 16 (4) of the Environmental Code, clarifying that the construction of electricity grids under the Electricity Code are exempted from the prohibition to carry out construction and maintenance of electricity grids in local areas that are protected according to Chapter 7, section 11 (1) and sections 13-14 of the Environmental Code.

This implies that the owner of the electricity grid is not required to apply for a dispensation to construct or maintain electricity grids in such areas. As described on pages 17-18 of the Proposal for a clearer process for the permitting of electricity grids No. 2023/24:88 (evidence 2*, hereinafter referred to as the "Proposal"*), the dispensation to construct or maintain electricity grids in local areas that are protected under the Environmental Code can take up to 1.5 years. It is further described that such dispensations are normally always granted, thus, introducing a codified exemption will simplify the procedure by saving significant time and resources for both grid companies and permitting authorities. However, as also emphasised on page 18 of the Proposal (evidence 2), this does not imply that environmental standards are lowered or that environmental considerations should be disregarded, as avoiding impact on protected local areas is an important element in the analysis undertaken as part of the environmental impact assessments and permit process for electricity grid projects. It is specifically mentioned on page 18 of the Proposal (evidence 2) that EU legislation on, for example, species and habitat protection, apply within local protected areas regardless of whether certain facilities are granted an exemption from the prohibitions in these areas or not.

According to section 8a of the Amending Ordinance on area protection (evidence 5), there is also no requirement to apply for a dispensation, if the permission to construct an electricity grid was awarded before a decision to establish a local protection area was taken.

and (b) a presumption for the use of overhead line solutions over ground cable solutions when assessing technology choices at the highest voltage levels (130 kV or higher), which shall amend the existing requirement that both types of solutions should be explored by default.

Pursuant to the authority granted to the Government under section 17a of the Act amending the electricity code (evidence 3), the Government has enacted the Amending Ordinance on grid concession (evidence 6). According to section 19a of the Amending Ordinance on grid concession (evidence 6), the default option for constructing electricity grids, with a voltage of 130 kV or higher, is by the use of overhead lines. Before this amendment entered into force there was no default defined and therefore both overhead and ground cable solutions had to be explored resulting in longer permitting processes for the grid construction as explained on page 15 of the Proposal (evidence 2).

4. Commission Preliminary Assessment: Satisfactorily fulfilled