Report

Public inquiries in Sweden and Norway

Kira Pronin, Ph.D., M. Econ.

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This research was requested by the Scottish Parliament's Finance and Public Administration Committee and was commissioned by SPICe in early summer 2025. The report aims to illustrate how two other European countries conduct processes similar to UK public inquiries. Any views expressed are those of the author and should not be attributed to the Finance and Public Administration Committee or to SPICe.

Dr Pronin is a Postdoctoral Researcher at the Whitman School of Management at the Syracuse University in the USA. Originally from Finland, Kira has studied in Norway and the United States. Her research focuses on the political economy and politics of expert advice in multiple institutional contexts. In 2023, Dr Pronin published a chapter on commissions of inquiry in Nordic countries in the book, *New directions in royal commissions and public inquiries: Do we need them?* (Scott Prasser (ed.)).

E-mail: kpronin@syr.edu. Website: About me – Kira Pronin – Ph.D. in Political Science

Table of contents

Introduction

This report examines the organization and operation of public inquiries in Sweden and Norway. It considers both the formal frameworks that structure inquiries and the practical ways in which they are established and conducted. The analysis draws on general sources as well as detailed case material, including **two recent Swedish inquiries**—**the Coronavirus Commission** and **the Adoption Commission** —and **one Norwegian inquiry into the terror attacks of July 22, 2011**.

The report is structured around eleven questions that guide the analysis:

1. Are there independent investigations similar to the UK public inquiries in Scandinavia?
2. Who decides to hold an independent inquiry (government or parliament)?
3. Who sets their terms of reference and how are these decisions made?
4. What issues/events are covered? Why are they held?
5. How long do these inquiries last and how much do they cost?
6. What legislative frameworks are in place?
7. Are there restrictions on how long inquiries last and how much they cost?
8. Who chairs and runs these inquiries?
9. How closely do inquiry teams work with government?
10. What mechanisms are in place to monitor the implementation of recommendations?
11. What is the reputation of public inquiries in these countries, and are those impacted by events (and the general public) satisfied with how they are run?

By addressing these questions, the report highlights both the similarities and the distinctive features of the Scandinavian approach to public inquiries, including their role in governance, and impact on political decision-making and public trust.

Public Inquiries in Scandinavian Countries

(Question 1)
In Scandinavian countries, **commissions of inquiry** appointed by the government serve a role similar to that of public inquiries in “Westminster countries” (the UK, Ireland, Canada, Australia and New Zealand). These inquiries are generally advisory, not judicial, in nature. In Norway, there are also commissions of inquiry appointed by parliaments, but these are rare.

Commissions of inquiry serve two main purposes: shaping future legislation and, less often, investigating major accidents, crises, and controversial events. This report focuses on the latter, which, though rarer, have played a crucial role in examining large-scale accidents, national security threats, and contested historical events, and in proposing policy solutions or remedies to address the issues arising from these events. Their findings have often led to institutional or legislative changes.

SWEDEN

Appointment of inquiries, terms of reference, reasons for appointment, topics covered and length (Questions 2-5)

Public inquiries are initiated by the Swedish Cabinet by issuing a commission directive (*kommittédirektiv*). This directive outlines the inquiry’s **terms of reference**, specifies the type of inquiry to be held, identifies the issue to be investigated, and sets a closing date. It may also include additional instructions for the inquiry. Formally, the terms of reference are decided collectively by the Cabinet during their weekly meetings. In practice, this task is usually delegated to the ministry responsible for the policy area (Holmgren & Dahlström 2024).

The Cabinet uses the same appointment procedure for both investigative and policy advisory inquiries. Policy advisory inquiries conduct research, formulate policy, and facilitate pre-legislative bargaining among parties and interest groups. They are a cornerstone of the Swedish legislative process and make up the majority of inquiries. For instance, a dataset by Pronin (2020) and Dahlström et al. (2021) records 3,010 inquiries appointed between 1990 and 2016, of which only 16–17 resemble the investigative inquiries found in Westminster systems.

The heavy reliance on independent inquiries in the policy formulation stage of the legislative process stems from several factors. First, Swedish ministries are small and have limited capacity, so inquiries expand their policy preparation resources. Second, while Sweden has many agencies with strong research capabilities, the constitution guarantees their autonomy, preventing direct political control (Premfors 1983; Ahlbäck,

Öberg, and Wockelberg 2016). Third, Sweden's fragmented multiparty system, frequent minority governments, and powerful peak interest groups make pre-legislative negotiation essential.

The Cabinet may appoint either a **commission of inquiry** or a **special investigator (*särskild utredare*)** to conduct an inquiry. Commissions handle issues of national significance with broad societal impact, while special investigators address narrower, technical matters. Special investigator inquiries may even be as small as a single expert supported by one or more secretaries. Formally, the difference between the two is that commissions have a chairperson and one or more commissioners, while special investigator inquiries are led by a special investigator and have no commissioners.

Table 1 lists investigative inquiries whose reports were published between 1990 and 2024. The table draws from the dataset compiled by Pronin (2020) and supplemental information from Swedish government databases. Note that it is often difficult to distinguish inquiries investigating past events or public maladministration from those aimed at finding solutions for policy problems. Consequently, the table may not be fully comprehensive. Also note that the list includes two semi-permanent commissions: the (now-defunct) National Disaster Commission (Kn 1981:02) and the National Coordinator for Nuclear Waste (M 1996:C).

With few exceptions, the topics covered by investigative inquiries in Table 1. fall into four categories:

1. Evaluation of maritime disasters, floods, fires, and pandemic responses
2. Treatment of ethnic minorities and vulnerable groups
3. National security events or threats (e.g., terrorism, espionage)
4. Issues related to criminal investigations

The average length of the inquiries in Table 1. was 23.8 months. The shortest inquiry lasted 4.7 months, and the longest 57 months.

Table 1. Investigative inquiries appointed in 1990-2024, Sweden

Appt year	Name of commission and commission code	Report name, publication year and number	Type of issue/event	Dates/length (months)
1990	National Disaster Commission (Kn 1981:02)	The fire on Sally Albatross on 9-12 January 1990: investigation report (SOU 1991:33)	Maritime disaster	February 21 1990 – February 19 1991 (11.9 months)
1994	Inquiry for guidance after the Estonia disaster (C 1994:03)	"After Estonia": report of the Inquiry for guidance after the Estonia disaster (SOU 1996:189)	Maritime disaster	November 3 1994 – December 1996 (24.9 months)
1994	Commission of inquiry on the investigation of the assassination of	The criminal investigation after the assassination of Prime Minister Olof Palme: The Investigation	Criminal investigation	September 29 1994 – June 29 1999 (57.0 months)

	Prime Minister Olof Palme (Ju 1994:12)	Commission's Report (SOU 1999:88)		
1995	Submarine Commission (Fö 1995:04)	The submarine question 1981-1994 (SOU 1995:135)	National security	February 23 1995 – December 20 1995 (9.9 months)
1996	National Coordinator for Nuclear Waste (M 1996:C)	Campaign with knowledge and feelings - on the nuclear waste referendum in Malå municipality 1997: report (SOU 1998:62)	Administrative procedure	Completed: May 1998
1997	Commission on Jewish Assets in Sweden during the World War II (UD 1997:05)	Nazi gold and the Riksbank: interim report (SOU 1998:96) Sweden and Jewish assets: final report (SOU 1999:20)	Treatment of ethnic minorities	February 13 1997 – March 3 1999 (24.6 months)
1997	Analysis group for the review of the Estonia disaster and its consequences (K 1997:04)	A review of the Estonia disaster and its consequences: interim report 1 (SOU 1998:132) Learning from Estonia: The second interim and report and final report (SOU 1999:48)	Maritime disaster	September 8 1997 – April 1999 (18.7 months)
1999	Inquiry into the dissemination of news to affected persons in connection with the Gothenburg fire (Ku 1998:05)	The fire disaster in Gothenburg - victims, media, authorities: report (SOU 1999:68)	Crisis communication	November 9 1998 – May 1999 (5.7 months)
1999	Inquiry into the Gothenburg fire on October 29-30, 1998 (Fö 1999:02)	The inquiry into the Gothenburg fire on October 29-30, 1998 (SOU 2000:113)	Fire response	June 10 1999 – December 2000 (17.7 months)
1999	Vulnerability and security inquiry (Fö 1999:04)	Four national crisis management structures are tested on the basis of the flood cases in 1993, 1995 and 2000. A comparison between the Swedish handling of flood cases and the handling in France, Germany and the Netherlands (SOU 2001:41)	Flood response	June 23 1999 – May 11 2001 (22.6 months)
2000	The Osmo Vallo inquiry (Ju 2000:14)	Osmo Vallo – investigation of an investigation (SOU 2002:37)	Criminal investigation	December 14 2000 – April 2002 (15.5 months)
2005	Council for Support and Coordination in the Aftermath of the Tsunami Disaster (Fö 2005:01)	After the tsunami - first half of the year: Report of the Council for Support and Coordination following the tsunami disaster (SOU 2005:60)	Disaster response	January 10 2005 – June 2005 (4.7 months)

2006	Inquiry on documentation and support for individuals who have been subjected to abuse and neglect in the social child welfare system (S 2006:05)	Neglect in social child care during the 20th century (SOU 2009:99) The children that society betrayed - measures due to abuse and serious neglect in community care (SOU 2011:9) Neglect in social child care - Final report (SOU 2011:61)	Treatment of vulnerable groups	June 21 2006 - February 10 2011 (55.7 months)
2013	Bergwall Commission (Ju 2013:18)	Report of the Bergwall Commission (SOU 2015:52)	Criminal investigation	28 November 2013 – June 5 2015 (18.6 months)
2019	2018 Forest fire inquiry (Ju 2018:07)	Forest fires in summer 2018 (SOU 2019:7)	Fire response	August 20 2018 – February 6 2019 (5.6 months)
2020	Coronavirus Commission (S 2020:09)	Elder care during the pandemic (SOU 2020:80) Sweden during the pandemic (SOU 2022:10)	Treatment of vulnerable group; pandemic response	June 30 2020 – February 25 2022 (19.9 months)
2020	Truth and Reconciliation Commission for Tornedalians, Kvens and Lantalaiset (Ku 2020:01)	When human value was measured – Exclusion and assimilation of Tornedalians, Kvens and Lantalaiset (SOU 2022:32) As if we never existed – exclusion and assimilation of Tornedalians, Kvens and Lantalaiset (SOU 2023:68)	Treatment of ethnic minorities	March 23 2020 – November 2023 (43.3 months)
2023	The Adoption Commission (S 2021:08)	Sweden's international adoption activities. Lessons learned and the way forward, volumes 1 and 2 (SOU 2025:61)	Treatment of vulnerable groups	October 28 2021 – June 2 2025 (43.1 months)

Source: Pronin (2020), https://www.regeringen.se/rattsliga-dokument/statens-offentliga-utredningar/
Note: In instances where the SOU report did not specify a particular day of the month, the first day of the respective month has been assumed for the purpose of calculating durations. Duration calculations were performed by ChatGPT 5.0.

Inquiry budgets

The Government Offices (*Regeringskansliet*) establishes the budget for the inquiry based on a proposal submitted by the inquiry chair or special investigator. The Government Offices is a central agency that supports the government in its day-to-day operations and policy implementation. It is headed by the Prime Minister and includes the Prime Minister's Office (*Statsrådsberedningen*), ten ministries, and the Office for

Administrative Affairs (*Regeringskansliets förvaltningsavdelning*), which provides support services to the ministries.
The Government Offices also contains a special unit called the Commission Service (*Kommittéservice*), which provides administrative services to commissions of inquiry. These services include fully furnished office rooms, IT and telecommunications equipment, and information and advice on administrative matters and archives.

The budget proposal must include payments to any third parties performing assignments for the inquiry, additional costs incurred from holding meetings that last more than one day at an alternative location, travel beyond the standard commute to inquiry meetings, and publication costs for the inquiry reports (SFS 1998:1974 §9–10).

Legislative framework, restrictions on length and cost (Questions 6–7)

Currently, inquiries are regulated by the 1998 Commission Ordinance (SFS 1998:1474)[1] issued by the Government.[2] The Ordinance has been amended several times. The Prime Minister's Office has also issued the Commission Handbook (Ds 2001:1)[3], which contains information and guidelines for commission chairs, special investigators, secretaries and experts.

The Commission Ordinance does not set restrictions on how long inquiries last and how much they cost. Instead, inquiry timeframes are set in their terms of the reference, and their budget is established by the Government Offices (*Regeringskansliet*) **based on a proposal submitted by the inquiry chair or special investigator**. **If the inquiry needs more time, the government can issue additional commission directives to extend the timeframe.**

Over the years, there have been several attempts at limiting the number and length of commissions of inquiry. Notably, in 1982, the government of Olof Palme announced that the number of commissions would be decreased, that their timeframes would be restricted to two years and that routine policy proposals would be prepared by ministries and governmental agencies instead of commissions (Premfors 1983; Petersson 2016, p. 654). However, Palme's attempts led to only a temporary reduction in the number of commissions. In the 1990s, governments appointed just as many commissions as before (Petersson 2016, p. 655). However, these efforts have largely been concerned with policy advisory inquiries as they are far more numerous than investigative inquiries.

The Commission Ordinance specifies that either the Government or the minister authorized by the Government appoints or dismisses the chairperson/special investigator, commissioners, experts, secretaries and inquiry assistants (SFS

[1] https://www.riksdagen.se/sv/dokument-och-lagar/dokument/svensk-forfattningssamling/kommitteforordning-19981474_sfs-1998-1474/
[2] Regulation/ordinances (*förordning*) issued by the Government supplement and clarify laws promulgated by the *Riksdag* and can be changed by the Government.
[3] https://www.regeringen.se/rattsliga-dokument/departementsserien-och-promemorior/1999/10/ds-20001/

1998:1974 §24). In practice, the decision is usually delegated to the minister responsible for the policy area of the investigation.

Regarding the membership composition, the Ordinance stipulates that a commission of inquiry should consist of a chairperson and one or more commissioners. The commission may be assisted by **subject specialists** (*sakkunniga*), **experts** (*experter*), and **secretaries** (SFS 1998:1974 §2–4). Subject specialists may participate in all meetings, take part in deliberations, and have access to all relevant documents. Experts assist only in a capacity defined by the commission, chairperson or the special investigator. The Ordinance applies equally to special investigator inquiries, except that they do not have commissioners.

Commission members who do not agree with the findings or conclusions of the inquiry can express reservations and dissenting opinions in the inquiry reports. Reservations are a stronger form of dissent and are more likely to express ideological disagreement, while dissenting opinions are more likely to cite technical reasons (Johansson 1992).

Commissions and special investigator inquiries may also have a reference group attached to it. These groups are usually comprised of stakeholders, but may also contain civil servants, representatives of relevant governmental authorities, and (rarely) members of the parliament from all the major parliamentary parties. Members of such groups are not officially part of the inquiry and have only a consultative role. The experts (usually academics or other professionals) may also be organized into an external expert group or several thematic expert groups. Such expert groups may be asked to write reports on certain subtopics requiring special expertise.

Table 2. summarizes the main differences between commissions of inquiry and special investigator inquiries.

Table 2. Commissions of inquiry vs. special investigator inquiries

	Commission of inquiry	**Special investigator inquiry**
Topics investigated	Matters of national significance with broad societal impact	Narrower, more technical issues
Regulatory framework	1998 Commission Ordinance (SFS 1998:1474)	
Powers	Advisory only	
Membership structure	Chairperson One or more commissioners Experts Subject matter specialists One or more secretaries	Special investigator Experts (Subject matter specialists) One or more secretaries
Type of dissent allowed	Reservations (commissioners) Dissenting opinions (commissioners, subject matter	Dissenting opinions (subject matter specialists, experts only if permitted)

	specialists, experts only if permitted)	

The chairperson's compensation is determined by the Government Offices. The chairperson receives either a set monthly payment, or, when appropriate, a lump sum payment (SFS 1998:1974 §25, §31). Commissioners, subject matter specialists, and experts are remunerated on a per day basis (SFS 1998:1974 §26). In addition, those who forego their regular salary due to their commission assignment are entitled to compensation of the corresponding amount (SFS 1998:1974 §28-30). The Government Offices retains the authority to decide about compensation to the commission members within the bounds of the Ordinance.

The Ordinance does not define the role of secretaries. In practice, they assist in drafting the inquiry report, while additional support staff perform purely clerical tasks. Secretaries are considered employed by the commission and their salary is usually covered under collective bargaining agreements.

New requirement to demonstrate impact of recommendations

Depending on the nature of the inquiry, the commission or special investigator may be required to provide impact assessments and estimation of the costs required to implement the proposed policies (SFS 1998:1974 §14-§16, SFS 2024:183 and SFS 2024:185). The April 2024 amendment to the Commission Ordinance (SFS 2024:185) requires inquiries to state how their proposals will be funded if the proposals result in increased costs or reduced revenues for the state, municipalities, or regions. The March 2024 amendment (SFS 2024:183) gives detailed instructions for the impact assessments the inquiry must provide. These amendments were enacted as a response to criticisms that previous impact assessments had not been sufficiently detailed.[4]

The new regulations (specifically, §6 of SFS 2024:183) state that the impact assessment must contain a description of:

1. the problem and the desired change sought
2. the consequences of taking no action
3. other ways of accomplishing the same goal and the advantages and disadvantages of each alternative
4. the most appropriate alternative(s) to the proposed change and reasons for considering them the most appropriate.

In addition, §7 specifies that the impact assessment should include:

[4] Ministry of Finance, press release March 27 2024, https://www.regeringen.se/pressmeddelanden/2024/03/regeringen-infor-tydligare-regelverk-for-konsekvensutredningar/

1. a description and calculation of the costs and revenues of the proposal or decision for the state, municipalities, regions, companies and other individuals
2. a description and, if possible, a calculation of additional impacts
3. the measures taken to ensure that the proposal or decision does not entail more far-reaching costs or limitations than are deemed necessary to achieve its objective
4. an assessment of whether special consideration needs to be taken with regard to the date of entry into force and whether there is a need for special communication efforts, and
5. a description of how and when the impact of the proposal or decision can be evaluated.

Background of chairpersons and overall membership composition (Question 8)

The commission chair is typically a high-ranking civil servant with relevant subject matter experience, a professor, or a judge. Table 3 lists the chairpersons for the inquiries in Table 1:

Table 3. Investigative inquiry chairpersons/special investigators, 1990-2024, Sweden

Commission code	**Role**	**Name**	**Title**
Kn 1981:02	Chairperson	Carl G.Persson	(former) county governor (civil servant)
Fö 1995:04	Chairperson	Hans G. Forsberg	professor
C 1994:03	Special investigator	Peter Nobel	jurist
M 1996:C	Special investigator	Olof Söderberg	Not recorded in report
UD 1997:05	Chairperson	Rolf Wirtén	(former) county governor (civil servant)
K 1997:04	Chairperson	Peter Örn	secretary-general, Swedish Red Cross
Ku 1998:05	Special investigator	Kent Asp	professor
Ju 1994:12	Chairperson	Lars Eric Ericsson	county governor (civil servant)
Fö 1999:02	Special investigator	Ulf Larsson	director-general (civil servant)
Fö 1999:04	Special investigator	Åke Pettersson	senior adviser
Ju 2000:14	Special investigator	Mats Svegfors	county governor (civil servant)
Fö 2005:01	Chairperson	Kerstin Wigzell	director-general (civil servant)
S 2006:05	Special investigator	Göran Johansson	investigator (civil servant)
Ju 2013:18	Special investigator	Daniel Tarschys	professor emeritus
Ju 2018:07	Special investigator	Jan-Åke Björklund	(former) regional director (civil servant)
S 2020:09	Chairperson	Mats Melin	(former) President and Justice of the Supreme Administrative Court

Ku 2020:01	Chairperson	Elisabet Pine	(former) Chief Parliamentary Ombudsman
S 2021:08	Special investigator	Anna Singer	professor of civil law

Subject matter specialists may include civil servants with relevant experience, agency staff, professors, representatives of interest groups, and other professionals such as accountants or lawyers. Subject matter specialists are more likely to be drawn from the civil service and government agencies, whereas experts are more often academics (Pronin 2020).

Secretaries are usually middle-level civil servants from relevant ministries and central agencies, while support staff are typically lower-level civil servants recruited from ministries.

How inquiries operate, relationship with government, mandatory reporting (Question 9)

According to the Commission Handbook (p. 85), **the work of the commissions consists of "a number of meetings and work between these" and that the "main purpose of the meetings is to ensure that the members of the group will contribute ideas, knowledge and experience."** The Handbook further states that "the most important meetings are those in which the members of the commission delimit and define the assignment, set the interim goals for the Inquiry's work, and take a final position on the content of the report."

Typically, inquiries solicit information and opinions from government authorities responsible for the policy area under investigation, social partners, relevant interest groups, and academic researchers specialized in the topic of the inquiry. Consultations with other governmental authorities may be voluntary or required in the terms of reference:

> "Directives for a commission sometimes require the commission to consult with a governmental authority… The Commission should also, where necessary, consult other authorities and make use of their knowledge. A general obligation for authorities to help each other within the framework of their own activities follows from §6 of the Administrative Procedure Act (SFS 1986:223)" (The Commission Handbook, p. 98).

The 1976 Commission Ordinance (superseded by the 1998 Commission Ordinance) states this explicitly: "Commissions may call for a consultation with government authorities. Such authorities shall provide information and deliver opinions when requested by a commission" (SFS 1976:119 §6).

Regarding obtaining inquiry-relevant information from experts, the Commission Handbook states:

> “An inquiry often needs to obtain information in areas where the literature is sparse or where a specialist is needed to overview and analyze the literature. One way to obtain information in such cases is to interview experts and others with knowledge of the issue” (p. 91).

However, commissions have no specific power to compel private individuals or entities to provide them information or testimony (see discussion in SOU 1999:88, p. 29).

Legally, inquiries have a status similar to other government agencies, which grants them a high degree of independence during their operation (Petersson 2016 p. 651). However, the Cabinet can include further instructions regarding cooperation or reporting to the appointing ministry or relevant government agencies in the commission directive. Once an inquiry is under way, the government can also issue additional directives to provide further instructions or extend the timeframe of the inquiry. However, inquiries generally have considerable discretion as to which authorities and organizations they are in contact with and how to organize their work.

Regarding decision-making, if the inquiry was set up as a commission of inquiry (rather than a special investigator inquiry), its decisions are made by commissioners (full members of the commission), often by a majority yes/no vote in response to questions posed by the chairperson. Routine matters of an internal, administrative nature can be delegated to the secretaries (The Commission Handbook, p. 88). In special investigator inquiries, the decisions are made by the special investigator.

The Commission Ordinance lists several reporting requirements. First, the commission or special investigator must draw up a plan for their investigation “as soon as possible” after its appointment. The plan should contain activities to be carried out and their expected duration. The inquiry is also expected to keep the appointing ministry informed on its plans on a continuous basis (SFS 1998:1974 §8, Commission Handbook (Ds 2001:1), p. 17). The ministry decides how this is organised (Commission Handbook (Ds 2001:1), p. 17).

Commissions are expected to keep meeting minutes (SFS 1998:1974 §11). The inquiry is also required to submit a yearly report of its activities to the Government Offices by November 1 (SFS 1998:1974 §12).

The government must also provide a yearly Commission Report (Kommittéberättelse) to the *Riksdag* (the Swedish Parliament) with information about the activities of all ongoing and completed commissions of inquiry and special investigator inquiries. The report mandate is stated in the *Rules of Procedures of the Riksdag* as follows: “The Government shall submit an annual report to the *Riksdag* on the activities of the inquiries that have been appointed pursuant to the Government's decision” (Chapter 9, Section 9).

The report must include the following:

- list of members
- reports published
- costs incurred
- gender balance
- changes in the status of the inquiry (e.g., completed).

After the inquiry: inquiry reports, the referral process, monitoring of implementation of recommendations (Question 10)

After the inquiry completes its investigation, its findings and recommendations are published in the Swedish Government Official Reports (*Statens offentliga utredningar*) series (SFS 1998:1974 §13, §22). An inquiry may also produce interim reports. The interim reports will often focus on a specific topic related to the overall goal of the inquiry, while the final report presents the final findings and recommendations of the inquiry, though this may vary. For example, the interim report of the 2020 Coronavirus Commission (*Elderly care during the pandemic,* SOU 2020:80) focused on structural shortcomings which resulted in residential care centers being unprepared and ill-equipped to handle the effects of the pandemic.

After an inquiry has submitted its report to the minister responsible for the policy area, the report is sent for further comments to relevant government agencies, special interest groups, local government authorities, and other affected parties through the referral (*remiss*) procedure. Referrals must be in writing and the referral bodies must be given at least three months in which to submit their opinions. If a large proportion of the bodies to which the matter has been referred are negative, the Government may decide not to pursue the matter further, or try to find other solutions than those proposed by the inquiry. Chapter 7, Article 2 of the *Swedish Instrument of Government* mandates seeking advice on policy from all concerned parties, including local authorities and affected organizations and individuals, but the minister responsible for the policy area has a wide latitude in deciding which authorities and organizations to include (Petersson 2016, p. 652).

As the inquiries are purely advisory, **the government is under no formal obligation to implement the inquiry's recommendations. In practice, since policy advisory inquiries are an integrated part of the overall policy process, many inquiries have led to institutional or legislative change**.

Reputation of inquiries (Question 11)

The inquiry system is generally held in high regard and considered a cornerstone of the Swedish legislative process. However, over the years there have been concerns about the cost and length of inquiries and their tendency to suggest fiscally

unrealistic proposals (Petersson 2016, p. 654). These concerns have led to regulatory changes, most recently the 2024 amendments to the Commission Ordinance about impact assessments and estimates of costs of proposed policies (SFS 2024:183, SFS 2024:185).

Norway

Appointment of inquiries, terms of reference, reasons for appointment, topics covered, length (Questions 2-5)

In Norway, public inquiries can be appointed:

1. By the government, either
    a. By a Cabinet decision (formally, by a Royal Decree[5]).
    b. By a ministry (without a Royal Decree)
2. By the parliament (*Storting*)

Commissions appointed by the Government or a ministry:

Commissions of inquiry appointed by the Cabinet resemble Swedish commissions of inquiry in that their primary use is policy preparation in the pre-legislative stage of the policy process. However, there are also commissions of inquiry appointed to investigate past events or public maladministration. As in Sweden, policy advisory commissions which bring together bureaucrats, academics, interest groups and (occasionally) politicians to deliberate over policy problems and solutions greatly outnumber investigative commissions of inquiry. Since 1972, there have been about 1,600 commissions of inquiry. Only a small fraction of these have been investigative inquiries.

Cabinet-appointed commissions of inquiry are issued by Royal Decree at the Council of State (the Government's weekly meeting with the King at the Royal Palace). They are more common than ministry-appointed inquiries, which require no Royal Decree.

Commissions of inquiry are normally appointed for policy problems that have "significant economic or administrative consequences" or that concern "significant fundamental or political questions" (Office of the Prime Minister, 2018, p. 5). The 1975 circular (G-48/75) on commissions of inquiry (especially the investigative kind) from the Ministry of Justice and Police states that commissions are an extraordinary type of inquiry that should be used only if the responsible authority thinks it is "the "best way" to conduct an inquiry into a particular event. Inquiries appointed by ministries usually address

[5] Members of the Government, under the leadership of the King, normally gather for a meeting at the Royal Palace every Friday. This body is called the "King in Council", or simply "Council of the State", and is the highest administrative body in the Norway. Royal decrees refer to decisions by the Council of the State (Source: *The King in Council of the State, The Office of the Prime Minister guidelines*, https://www.regjeringen.no/contentassets/986cbb8dd1f248da951824883b1be724/no/pdfs/om-kongen-i-statsrad-240924.pdf)

narrower topics, such as individual maritime disasters. Parliamentary approval is not required for either.

The 2024 guide to commission chairpersons, members and the secretariat published by the Ministry of Digitalisation and Public Governance[6] suggests that **commissions of inquiry:**

> "…may be well suited to deal with complicated issues characterised by professional disagreement or dilemmas, value choices and conflicting interests. Reports from internal working groups and reports written by a ministry will often not have sufficient legitimacy in such situations to clarify the questions. A ministry will normally not be able to possess such expertise that it will have the legitimacy to clarify professional disputes, and in such cases a commission of inquiry could be a good solution" (p. 12).

These guidelines are aimed at both policy advisory and investigative commissions.

The Guide further suggests that it is preferable to have a commission of inquiry appointed by the Council of the State, if interests of several ministries are impacted or if the appointment of the commission may affect the Government's future freedom of action to a significant extent. In such cases, it is important that the entire Cabinet supports the appointment. This may be the case also when the commission will have members from outside parties (p. 12).

The terms of reference of commissions of inquiry are prepared by the responsible ministry, which also selects the members of the commission. The terms of reference and the membership composition are discussed within the Cabinet, and formally approved by the Council of State (Ministry of Finance, 2016; Office of the Prime Minister, 2018).

<u>Parliamentary commissions of inquiry:</u>

Parliamentary commissions of inquiry (*parlamentariske granskingskommisjoner*) are relatively rare and have been appointed only eight times since 1883. However, seven of these appointments occurred relatively recently, between 1987 and 2023. Among the most significant parliamentary commissions of inquiry was the Lund Commission of 1996, which undertook a broad review of post-1945 security services and found evidence of illegal surveillance of certain political groups. The most recent, launched in June 2018, was a truth and reconciliation commission examining the Norwegianization policy and historical injustices against the Sami, Kven, and Norwegian Finns.

Parliamentary commissions of inquiry are generally **appointed by the Standing**

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6 https://www.regjeringen.no/contentassets/793636d2e55a4236b82e632897f96d50/no/pdfs/utvalgsarbeid-i-staten.pdf

Committee on Scrutiny and Constitutional Affairs[7], which has a special right to act on its own initiative. The Standing Committee was established in in 1993 and serves a key supervisory role in matters relating to the *Storting*'s supervisory authority and constitutional matters. **The Parliament can also decide to appoint an inquiry by majority vote.**

Parliamentary commissions of inquiry are reserved for extraordinary events and issues. The mandate and terms of reference of parliamentary commissions of inquiry are determined by the *Storting*. The mandate may include the right to access restricted information, subject to other laws and regulations.

Topics and length of inquiries:

Table 4 lists both government-appointed and ministerial commissions of inquiry whose reports were published between 1990 and 2024. Table 5. lists parliamentary commissions of inquiry appointed in the same time period.

Most of the topics covered by investigative inquiries in Tables 4. and 5. fall into five categories:

1. Evaluation of maritime disasters, railway accidents, and pandemic response
2. Treatment of ethnic minorities and vulnerable groups
3. National security events or threats (e.g., terrorism, espionage, military action)
4. Issues related to criminal investigations
5. Public maladministration, issues related to public projects etc.

The average length of the inquiries in Table 4. was 14.8 months. The shortest inquiry lasted 2.5 months, and the longest 53.2 months.

Table 4. Investigative commissions of inquiry (NOU) in 1990-2024, Norway.

Appt year	Report name, publication year and number	Type of issue/event	Duration	Appointed by
1990	"Scandinavian Star" Accident, April 7, 1990. Report from the commission of inquiry appointed by Royal Decree on 20 April and 4 May 1990 (NOU 1991:1)	Maritime disaster	April 20 1990 – January 1991 (8.4 months)	Government
1991	The Bank Crisis. Report by the Commission assessing the extent of the causes of the crisis in the banking industry appointed by Royal Decree 4 October 1991 (NOU 1992:30)	Banking crisis	October 4 1991 – August 31 1992 (10.9 months)	Government
1993	UNI Storebrand's treatment of the Skandia investment. Report from the commission appointed by Royal Decree on April 30 1993	Investigation of public administration	April 30 1993 – November 10 1993 (6.4	Government

[7] https://www.stortinget.no/en/In-English/Standing-Commitees/The-Standing-Committee-on-Scrutiny-and-Constitutional-Affairs/Scrutiny-and-Constitunional-affairs-Responsibilities/

	(NOU 1994:7)		months)	
1995	The Liland Affair. From a committee appointed by Royal Decree of 13 July 1995 to investigate the Liland case (NOU 1996: 15)	Criminal investigation	July 13 1995 – July 1 1996 (11.7 months)	Government
1996	Confiscation of Jewish property in Norway during World War II. Report from the commission mapping what happened to Jewish property in Norway during the World War II and the settlement after the war (NOU 1997:22)	Treatment of ethnic minorities	March 29 1996 – June 1997 (14.1 months)	Ministry of Justice and the Police
1998	Analysis of investment developments on the continental shelf (NOU 1999:11)	Cost overruns of oil extraction development project	August 28 1998 – February 3 1999 (5.2 months)	Government
1998	The Gardermo project. Evaluation of planning and implementation. Report by a group appointed by Royal Decree of 15 May 1998 (NOU 1999:28)	Issues with airport/airport train construction	May 15 1998 – September 1 1999 (15.6 months)	Government
1998	The Lillehammer case. Circumstances surrounding the murder of Ahmed Bouchikhi on 21 July 1973 and the case's subsequent handling by the Norwegian authorities. Report of a investigative committee appointed by Royal Decree of 20 November 1998 (NOU 2000:6)	Criminal investigation	November 20 1998 – March 1 2000 (15.4 months)	Government
1999	The sinking of the speedboat MS Sleipner on 26 November 1999. Report from the Commission of Inquiry appointed by the Ministry of Justice and the Police (NOU 2000:31)	Maritime disaster	December 1 1999 – November 8 2000 (11.3 months)	Ministry of Justice and the Police
2000	The Åsta accident, 4 January 2000.Main report from the Commission of Inquiry appointed by Royal Decree of 7 January 2000 (NOU 2000:30).	Railway accident	January 7 2000 – November 6 2000 (10.0 months)	Government
2000	The Lillestrøm accident on 5 April 2000. Report from the Commission of Inquiry appointed by the Government by Royal Decree on 7 January 2000 in connection with the Åsta accident, which on 7 April 2000 was given an extended mandate to also investigate the train accident at Lillestrøm station (NOU 2001: 09)	Railway accident	April 7 2000 – November 6 2000 (7.0 months)	Government
2001	The pioneer divers in the North Sea. Report from the Commission of Inquiry for the Investigation of the Conditions of Pioneer Divers in the North Sea, appointed by the Crown Prince Regent's Decree of 2 March	Work conditions of oil/gas exploration divers	March 2 2001 – December 31 2002 (22.0 months)	Government

	2001 (NOU 2003:5)			
2001	An investigation of allegations of unethical medical research involving LSD, electrodes and radioactive radiation on humans in Norway in the period 1945 – 1975. Report from a Commission appointed by Royal Decree of 5 October 2001 (NOU 2003:33)	Treatment of vulnerable groups/public maladministration	October 5 2001 – December 17 2003 (26.4 months)	Government
2002	The sinking of the fishing vessel "Utvik Senior" on 17 February 1978. Report from the commission of inquiry appointed by the Ministry of Justice and the Police (NOU 2004: 9)	Maritime disaster	May 8 2002 – April 20 2004 (23.4 months)	Ministry of Justice and the Police
2003	Orphanages and special schools under scrutiny. National survey of neglect and abuse in child welfare institutions 1945–1980. Report from a committee appointed by the Ministry of Children and Families 19 December 2003 (NOU 2004:23)	Treatment of vulnerable groups	December 9 2003 – November 1 2004 (10.8 months)	Ministry of Children and Families
2006	Investigation of the Norwegian Directorate of Immigration. Report from a commission of inquiry appointed by Royal Decree on 7 April 2006 (NOU 2006:14)	Issues with public administration	April 7 2006 – June 23 2006 (2.5 months)	Government
2006	Fritz Moen and Norwegian criminal justice. Report from a commission appointed by Royal Decree of 8 September 2006 (NOU 2007:7)	Criminal investigation	September 8 2006 – June 25 2007 (9.6 months)	Government
2006	The Rosenborg case. The public sector's handling of cancer among employees and students at the Norwegian School of Education in Trondheim/The Norwegian University of General Sciences. Report from the commission of inquiry appointed by Royal Decree of 22 December 2006 (NOU 2007: 9)	Issues with public administration	December 22 2006 – August 16 2007 (7.8 months)	Government
2007	The Loss of the “Bourbon Dolphin” on 12 April 2007. Report from a commission appointed by Royal Decree on 27 April 2007 (NOU 2008:8)	Maritime disaster	April 27 2007 – March 28 2008 (11.1 months)	Government
2011	Report of the 22 of July Commission appointed by Royal Decree on 12 August 2011 to review and draw lessons from the attacks on the Government Quarter and Utøya on 22 July 2011 (NOU 2012:14)	Terrorism	August 12 2011 – August 13 2012 (12.1 months)	Government
2011	Assimilation and resistance: Norwegian policy towards the Tatars/Romani people from 1850 to the present. Report from a commission appointed by Royal Decree on 3 January 2011 (NOU 2015:7)	Treatment of ethnic minorities	January 3 2011 – June 1 2015 (53.2 months)	Government

2014	A Good Ally: Norway in Afghanistan 2001–2014. Report from a commission appointed by Royal Decree 21 November 2014 (NOU 2016: 8).	Military action	November 21 2014 – June 6 2016 (18.5 months)	Government
2015	Failure and betrayal: Review of cases where children have been exposed to violence, sexual abuse and neglect. Report from a commission appointed by Royal Decree 13 November 2015 (NOU 2017: 12)	Treatment of vulnerable groups	November 13 2015 – June 22 2017 (19.3 months)	Government
2020	The Norwegian Government's Management of the Coronavirus Pandemic – Part 1. Report from the Corona Commission appointed by a Royal Decree on 24 April 2020 to review and draw lessons from the Covid-19 outbreak in Norway (NOU 2021: 6) The Norwegian Government's Management of the Coronavirus Pandemic – Part 2 (NOU 2022: 5)	Pandemic response	April 24 2020 – April 26 2022 (24.1 months)	Government
2022	Evaluation of the pandemic management: Report from the Corona Commission appointed by Royal Decree on 29 April 2022 to review and draw lessons from the corona pandemic in Norway (NOU 2023:16).	Pandemic response	April 29 2022 – June 2 2023 (13.1 months)	Government

Source: https://www.regjeringen.no
Note: Duration calculations were performed by ChatGPT 5.0.

The average length of a parliamentary commission of inquiry in Table 5. was 21.8 months. The shortest parliamentary inquiry lasted 4.1 months and the longest 59.7 months.

Table 5. Parliamentary commissions of inquiry (*parlamentariske granskingskommisjoner*) in 1990-2024, Norway

Appt year	Report name, year of publication and number	Type of issue/event	Duration
1996	The Lund Commission. Report to the Storting from the commission appointed by the Storting to investigate allegations of illegal surveillance of Norwegian citizens (the "Lund Report"). Document No. 15 (1995-96)	Allegations of illegal surveillance of Norwegian citizens	February 1 1994 – March 28 1996 (25.9 months)
1997	The Bank Crisis Commission. Report to the Storting from the commission appointed by the Storting to review various causal factors related to the banking crisis. Document No. 17 (1998-99).	Causes and handling of the 1987–92 banking crisis	May 30 1997 – June 29 1998 (13.0 months)

2000	Gardermo-project. Report to the Storting from the Commission appointed by the Storting to carry out a broad review of the study, planning, design and development of a new main airport for Eastern Norway and the Gardermo Line. Document No. 18 (2000-2001)	Issues with airport/airport train construction	June 5 2000 – March 1 2001 (9.9 months)
2003	Report to the Presidium of the Storting from the Storting's Commission of Inquiry into the Mehamn accident/Report from the Storting's commission of inquiry into the aviation accident involving Twin Otter LN-BNK near Gamvik on 11 March 1982. Document No. 24 (2004-2005)	Air disaster	January 30 2003 – September 20 2005 (31.7 months)
2008	Legal certainty in the allocation and follow-up of parliamentary pensions. Report from an expert commission set on 4 September 2008 by the Presidium of the Storting.	Issues with pensions for members of Parliament brought up in the Auditor General's report in 2008	September 4 2008 – January 8 2009 (4.1 months)
2016	Report to the Storting from the Storting's Commission of Inquiry into the fire at Scandinavian Star. Document 18 (2016-2017)	Maritime disaster	April 20 1990 – January 1991 (8.4 months)
2018	Norwegian Truth and Reconciliation Commission (TRC). Report to the Storting from the Truth and Reconciliation Commission. Document 19 (2022-2023), Recommendation 30 S (2024-2025)	Treatment of ethnic minorities	June 14 2018 – June 1 2023 (59.7 months)

Source: https://www.stortinget.no/no/Saker-og-publikasjoner/Publikasjoner/Dokumentserien/
Note: Duration calculations were performed by ChatGPT 5.0.

Legislative framework, restrictions on length and cost (Questions 6–7)

Commissions of inquiry appointed by the government or a ministry

Commissions of inquiry appointed by the Cabinet or a ministry are regulated by a patchwork of regulations, ministerial guidelines, and general administrative law.

The 1975 circular "Rules for commissions of inquiry" (G-48/75)[8] from the Ministry of Justice and the Police, though somewhat outdated, forms the basis of the regulatory framework for commissions of inquiry. However, it states explicitly that it is not meant to apply to inquiries which investigate the causes of large-scale accidents, maritime or air disasters, or authorities whose responsibility is to investigate such events.

In 2007, the government appointed a commission to perform a thorough evaluation of commissions of inquiry, including their legal status, and propose new, updated legislation. In 2009, the commission released a report titled "Act on Official Investigation Commissions" (NOU 2009:09) which included a draft proposal for new legislation for

[8] https://www.regjeringen.no/no/dokumenter/nou-2009-09/id558412/?ch=8

commissions of inquiry. So far, the proposal has not been turned into legislation in the *Storting*. However, the report's recommendations are often cited in commission reports and applied as guideline.

The Ministry of Finance published general guidelines (*Utredningsinstruksen*) about commissions of inquiry 2016[9]. These were amended in October 2024.

In addition to the general guidelines, the Ministry of Digitalisation and Public Governance has published a guide for commission chairpersons, members and the secretariat. The most recent version (*Commission work for the state: A guide for chairpersons, members and secretaries in commissions of inquiry/Utvalgsarbeid i staten:* En veileder for ledere, medlemmer og sekretærer i statlige utredningsutvalg) came out in 2024. The purpose of these guidelines is to provide practical advice and tips which may contribute to the efficiency of the commission work and to better compliance with the Instructions for Official Studies and Reports. The guide also provides guidance to ministries on writing terms of reference.

Commissions of inquiry do not have judicial or judicial decision-making authority. Therefore, their conclusions have no direct legal effects on those mentioned in the commission's report. Instead, the purpose of commissions' reports is to help the appointing body and the general public to understand the events that have happened and to form a basis for further decision-making. The 1975 circular "Rules for commissions of inquiry" (G-48/75)[10] from the Ministry of Justice and the Police, states that, as a rule, Commissions should not decide "whether there is criminal offence, grounds for claiming compensation or grounds for other sanctions, these questions are to be considered by the prosecutorial authority, the authority that has the mentioned to the Commission, or by the injured party." However, there have been cases where commissions of inquiry have been asked to make assessments of civil liability (p. NOU 2009:09 74). These assessments are nonbinding, however.

<u>Parliamentary commissions of inquiry:</u>

There are currently no general regulations for parliamentary commissions of inquiry (*parlamentariska granskingskommisjoner*), beyond what is stated in §19 of the *Storting*'s Rules of procedure (last updated February 15 2024). The Rules state that "The *Storting* may appoint a commission of inquiry to clarify or assess a previous factual course of events," and that "proposals to appoint a commission of inquiry shall be considered by the Standing Committee of Scrutiny and Constitutional Affairs, or by a special committee appointed by the Storting." In addition, "the Standing Committee of Scrutiny and Constitutional Affairs may submit such a proposal on its own initiative."

The only statutory provision that generally applies to commissions appointed by the *Storting* is Section 43, second paragraph, of the Courts of Justice Act, which means that a commission may require judicial hearings, which will trigger a duty to testify. However,

[9] https://lovdata.no/dokument/INS/forskrift/2016-02-19-184
[10] https://www.regjeringen.no/no/dokumenter/nou-2009-09/id558412/?ch=8

a commission may be instructed to operate similarly to government-appointed commissions of inquiry.[11]

The Storting covers the costs of commissions appointed by parliament.

Selection of chairpersons, relationship with government (Questions 8-9)

Commissions of inquiry appointed by the government or a ministry

The government appoints a chairperson and members, and assigns the commission a secretariat. The chairperson organizes and sets the direction for the work of the commission and its secretariat. He or she also represents the commission vis-a-vis the government and the public (Christensen & Holst 2017). **The 1975 circular "Rules for commissions of inquiry" (G-48/75, III) states that the chairperson must be someone who has understanding of legal rules of procedure and assigning responsibility, and would thus ordinarily be a jurist.**

As in Sweden, commissions of inquiry are quite free to organize their work as they see fit. The Guide for the Work of Public Commissions (Ministry of Local Government and Modernization, 2019) describes best practices for commissions, but there are few if any formal rules about the conduct of members of commissions. During their operation, commissions work independently of their appointing body and other authorities. This ensures that the investigation is conducted fairly and without outside interference. However, the Ministry of Finance's 2024 amendment of inquiry guidelines state that "The administrative body responsible for the inquiry shall ensure that the provisions of the instructions are complied with. If it is a public study, the necessary requirements must be incorporated into the mandate."[12]

Commission meetings are typically closed to the public. This is also stated in the 1975 Circular (G-48/75, IV, 2): "Commission meetings are not public, unless the commission finds it necessary to make them so."

Parliamentary commissions of inquiry:

The membership composition of parliamentary commissions of inquiry, including the chairperson, are determined by the *Storting.* The *Storting*'s Rules of procedure states: "A commission of inquiry appointed by the *Storting* shall consist of persons with the necessary professional competence and integrity."

The Rules also state that a person affected by the investigation may be reimbursed for necessary costs if there are reasons for doing so.

[11] https://www.stortinget.no/no/Saker-og-publikasjoner/Publikasjoner/Dokumentserien/2020-2021/dok21-202021/?m=4
[12] https://lovdata.no/dokument/INS/forskrift/2016-02-19-184

Once appointed, parliamentary commissions of inquiry carry out their work independently of the *Storting*.

After the inquiry: inquiry reports, the referral process, monitoring of implementation of recommendations, reputation of inquiries (Question 10,11)

After the inquiry completes its investigation, its findings and recommendations are published in a report in the Norwegian Government Official Reports (*Norges offentlige utredninger, or NOU*) series. As in Sweden, the reports are typically sent out for consultation to affected authorities, affected businesses, various professional communities and relevant interest organizations. Often, several hundred public and private bodies and organizations can be invited to submit a consultation statement for an NOU.

After the presentation of the report, the ministry responsible for the policy area of the investigation will then further develop the recommendations, culminating in a separate report to the *Storting*. In other words, the report to the *Storting,* and not original commission report, forms the basis for the *Storting*'s further consideration of the matter.

P**arliamentary commissions of inquiry send their reports directly to the *Storting*.** The reports are generally made public. Before the Storting makes the final assessment of the report, it submits the report to the Government for a written statement. The reports are generally public, unless there are special considerations for keeping the report or parts of the report confidential.

Case study 1 (Sweden): The Coronavirus Commission

Appointment and background

The Coronavirus Commission was appointed on 30 June 2020 (directive: 2020:74) by the Löfven II government[13], following discussions with the parties in the *Riksdag* (the Parliament). On the same day, the government appointed former President and Justice of the Supreme Administrative Court, Mats Melin, as the commission chair. The commission appointment was preceded by concerns about the high level of mortality among the elderly in care homes during the early phase of the pandemic, but the main motivation was to monitor and evaluate the government's and public health authorities'

[13] The Löfven II government, formed on 21 January 2019, was a weak minority government with only 33% of seats in the Riksdag, made up of the Social Democrats and Green Party. To maintain support, it signed the January Agreement with the Centre Party and Liberals. On 21 June 2021, Prime Minister Stefan Löfven was ousted in a historic no-confidence vote after the Left Party withdrew support over plans to abolish rent controls. Notably, the vote was not due to the government's handling of the Covid-19 pandemic.

Covid-19 response.

The Government classified the new coronavirus as a danger to the public on February 1, 2020, following a request by the Swedish Public Health Agency.[14] In Spring 2020, both the Government and public health authorities took several actions in response to the outbreak. The recommended measures included: (1) travel advisories (but not a ban); (2) general regulations regarding hygiene, such as staying home when having symptoms, and physical distancing; (3) general regulations about working from home; (4) general recommendations regarding online teaching at high schools and universities; (5) limits on public gatherings; (6) limits on restaurant operations; (7) limits on elder care home visits; and (8) general regulations regarding using mass transportation. On March 11 2020, the Government also proposed for revised budget with increased compensation to municipalities, regions and government agencies responsible for the COVID-19 response, as well as financial support to individuals and companies affected by the epidemic (on the same day).

Later in 2020, the *Riksdag* introduced several legally binding regulations with limits on public gatherings, restaurant operations, and visits to elderly care residences. In January 2021, the provisional COVID-19 Act [2021: 4] added a series of further restrictions with concomitant enforcement instruments.

Main actors

The main actors in Sweden's pandemic response were the Government, the Public Health Agency of Sweden (PHAS), the National Board of Health and Welfare (NBHW), the 21 regional councils and 290 municipalities, and the Swedish Association of Local Authorities and Regions (SALAR), which represents municipalities and regions and is Sweden's largest employer organization.

PHAS, under the Ministry of Health and Social Affairs, promotes public health and provides expert advice on infectious diseases. It is the main expert body providing advice to the Swedish government on public health and infectious diseases during the COVID-19 pandemic. NBHW oversees social and health services, issues regulations, licenses professionals, and ensured healthcare capacity during COVID-19, issuing guidance on issues such as end-of-life care.

Sweden's regions and municipalities, constitutionally autonomous, are primarily responsible for healthcare delivery, while the central government sets guidelines and principles (Health and Medical Service Act, SFS 1982:763).

Sweden's unique pandemic strategy

Sweden's pandemic strategy was stepwise and restrained, avoiding lockdowns, mask mandates, school closures, stay-at-home orders, or a national emergency. Instead, it relied on a "nudge" approach (Pierre, 2020), encouraging voluntary citizen compliance

[14] The event timeline is constructed from the database provided by Olofsson & Vilhelmsson (2022).

via information from the Public Health Agency of Sweden (PHAS) and government briefings. Legally binding restrictions were introduced later in 2020, with further measures under the COVID-19 Act [2021:4] in January 2021.

Several factors explain Sweden's distinctive approach. First, its public health system is highly capable, with clinical research facilities and a robust municipal healthcare structure (Sparf et al., 2022). Second, crisis management is decentralized, guided by the principles of responsibility (entities retain responsibility during crises), parity (authorities maintain their structure and location), and proximity (crises are handled at the lowest effective level), placing pandemic responsibility primarily with PHAS, NBHW, and the regions municipalities (Lynggaard et al., 2023). Third, Swedish agencies enjoy constitutional independence from political interference, limiting the government to non-binding recommendations unless new laws are passed.

This structure meant the initial COVID-19 response consisted mainly of non-binding recommendations rather than enforceable regulations. Collective government decision-making further reinforced this, making it harder to override agency guidance, though the Coronavirus Commission's final report challenges the view that the government could not have overridden agency decisions.

Terms of reference and timeframe

The terms of reference of the Coronavirus Commission gave the Commission the following tasks:

- evaluating the measures taken by the Government, relevant administrative agencies, and the regions and municipalities to address the Covid-19 outbreak and the effects of the outbreak.
- evaluating the organization of crisis management at the Government Offices, relevant administrative agencies, regions and municipalities,
- evaluating how the principle of responsibility and proximity have worked during the crisis
- proposing corrective measures

In addition, the Commission was also tasked with conducting an international comparison of the measures taken in other countries and their impact.

The directive also noted that "a large proportion of the deaths from COVID-19 have been people who were in elderly care and municipal healthcare settings. This raises a number of questions, and structural causes cannot be ruled out in this regard."

The directive also highlighted the highly decentralized nature of the Swedish public health administration. However, as the Commission notes in its final remarks, it was not in the position of evaluating the handling of the pandemic or the organisation of crisis management within each individual region, municipality and county administrative board.

The directive instructed the commission to submit its **first interim report by 30 November 2020, a second interim report by 31 October 2021, and its final report by 28 February 2022.** The directive stated that the first interim report had to discuss the spread of Covid-19 within elderly care homes. The second interim report was required to discuss the following topics:

- The spread of the virus to and within Sweden
- Measures to limit the spread of infection
- The ability of the health care system to deal with the virus outbreak
- Sampling and contact tracing
- Limiting the impact on socially important activities
- Measures to mitigate the impact on individuals
- The EU and international cooperation
- Consular work
- The public sector's cooperation with the business community and civil society in managing the impact of the virus outbreak
- Communication in response to the Covid-19 outbreak

The terms of reference directed the Commission to consult with all the relevant authorities, and social partners (meaning labor unions, SALAR etc.) with topics related to work conditions, and health and safety at work.

Table 4. shows the commission expenses as reported in the government's yearly Commission Reports (*Kommittéberättelsena*):

The cost of the Commission was approximately SEK 18.3 million (£1.5 million). The vast majority was spent on salaries. The rest related to per day remuneration, travel, printing and other administrative costs.

Table 5: costs of the Swedish Coronavirus Commission

	Total 2020-2022 (SEK million)
Salaries	14.5
Per day remuneration	1.5
Travel, printing and consultations	0.9
other admin	1.4
Total	**18.3**

Commission membership

Table 5. shows the membership composition of the Coronavirus Commission.

There were also three expert groups attached to the inquiry: 1) one with experts on infection control issues; 2) one devoted to the economic and social impact of the pandemic; and 3) crisis preparedness and management.

Table 6. Membership of the Coronavirus Commission (excluding secretaries)

Role	Name	Title
Chair	Mats Melin	Former President and Justice of the Supreme Administrative Court
Commissioner	Shirin Ahlbäck Öberg	Professor of Political Science at Uppsala University
Commissioner	Ann Enander	Professor Emeritus of Leadership, the Swedish National Defense University
Commissioner	Vesna Jovic	Municipal Director and former CEO, Swedish Association of Local Authorities and Regions
Commissioner	Camilla Lif	Minister and Vicar of Katarina Parish in Stockholm
Commissioner	Torsten Persson	Professor of Economics at the Institute of International Economics, Stockholm University
Commissioner	Göran Stiernstedt	Infectious Diseases Physician and Associate Professor
Commissioner	Mats Thorslund	Professor Emeritus of Social Gerontology, Karolinska Institute

How the inquiry operated

First phase/First interim report:
The first phase of the inquiry focused on the causes of excessive mortality among the elderly in residential care in the early phase of the pandemic, and in particular, any structural causes or lack of appropriate measures which could have contributed to the excessive mortality. To this end, the Commission held seven internal meetings in Autumn 2020. During the meetings, the Commission met with the Public Health Agency of Sweden (PHAS), the National Board of Health and Welfare, and the Health and Social Care Inspectorate (*Inspektionen för vård och omsorg*, a supervisory body), academic researchers, and people with experience with elderly care during the pandemic. In addition, the Commission reviewed information from various authorities, regions and municipalities, as well as official reports, news media, and trade and academic publications related to the care for the elderly and the pandemic.

The Commission also requested and received reports from Sweden's embassies in other Nordic and European countries on the organisation of care for the elderly and Covid-19 measures, as well as information from the Covid-19 commissions in Denmark and Norway and corresponding investigative authority in Finland. The commission also requested a study from Marta Szebehely, Professor Emeritus, about elderly care during the Covid-19 pandemic in Sweden, the Nordics and a few other countries

Finally, the Commission and its Secretariat gathered information from and met with representatives of certain regions and municipalities, The Swedish Association of Local Authorities and Regions (SALAR), healthcare providers, trade unions organisations,

professional associations and researchers etc. whose names are provided at the end of the interim report. In addition, a large number of individuals and non-profit associations themselves approached the Commission and provided additional information or reports.

Second interim report:
In between the publication of the first and second interim reports, the Commission held eleven internal meetings, most of them digital. The Commission also met with a large number of interested parties and held semi-informal hearings with representatives of public authorities and other interested parties (listed in the Appendix of the second interim report). In addition, the Commission continued the reviewing reports, surveys and articles from government agencies, researchers, interest groups and professional and trade union organisations.

The Commission also continued to work with three expert groups that had been authorized to research communicable disease control and dissemination, economic and social impacts of Covid-19 and government measures, and crisis preparedness and crisis management. The Commission also initiated a research programme on *COVID-19 in Sweden: Spread of infection, struggle and effects on individuals and society* in collaboration with researchers at Stockholm University.

Final report:

After the publication of the second interim report, the Commission held a further nine meetings. In connection with three of the meetings, the Commission questioned the Prime Minister Stefan Löfven, the current Prime Minister Magdalena Andersson, the former finance Minister Lena Hallengren and the former Minister of the Interior Mikael Damberg.

In preparation for the final report, the Commission and its secretariat again talked to a large number of authorities and interested parties (listed in the Appendix of the report). They also continued their cooperation with the three expert groups supporting the inquiry as well as the researchers at the Stockholm University's research programme on *COVID-19 in Sweden: Spread, control and effects on individuals and society*, who contributed reports on issues related to the impact of the pandemic effects on the economy of society, businesses and individuals have undermined legislative reports. The inquiry also received a memorandum on COVID-19 and judicial review in certain European countries from Professor Iain Cameron at Uppsala University.

Reports

The Commission published three reports:

- *Elderly care during the pandemic* (SOU 2020:80) on December 7 2020
- *Sweden during the pandemic* (SOU 2021:89) on 29 October 2021.
- The final two-volume report, also titled *Sweden during the pandemic* (SOU 2022:10)

on February 17 2022.

In addition, the expert groups produced six expert reports about crisis communication, the economic consequences of the pandemic and pandemic measures, support to businesses, and income and the effectiveness of welfare state protections during the pandemic.

Reaction and aftermath

The first interim report criticised the government for failing to protect elderly people in care homes and the second report characterised the government's response in early 2020 as "insufficient" and "late". However, the final report concluded that the government's strategy of not introducing lockdowns, as many other countries had done, was "fundamentally correct" for maintaining personal freedoms over those in other countries, but was critical of the decisions not to introduce "more rigorous and intrusive disease prevention and control measures" in February and March 2020. It also said that the government had delegated too much responsibility to the Public Health Agency of Sweden and the responsible bodies for decision making were not always clear.

The final report of the Commission concluded that Sweden’s hands-off approach focusing on voluntary compliance had been fundamentally correct (with some caveats on mistakes that were made early in the pandemic, such as failing to safeguard the elderly and that both policy advice and decision-making should have more broad-based), and that the principle that policy choices should be sustainable in the long term and accepted by the population had also been correct (Ludvigsson, 2023).

However, the Commission also criticized the Government for not taking a more decisive leadership position at the beginning of the pandemic: the government should have been better able to address the obstacles to clear national leadership such as independence of agencies, self-governing regional and municipal councils, and the Government Offices’ normal procedures for preparing government business.

Regarding the use of scientific expertise, the Commission criticized the Government for relying too heavily on assessments made by the Public Health Agency of Sweden, the responsibility of which rests on only one person – the Director General of the Public Health Agency.

The commission noted that it did not have the resources to evaluate either management or crisis management, organisation in each of the 21 regions, 290 municipalities or 21 county administrative boards, which are primarily responsible for healthcare delivery.

As of September 17, 2024, the government’s database of commissions shows no indication of the government initiating legislative action based on the reports. However, action was taken after the first interim report to protect the elderly.

Case study 2 (Sweden): The Adoption Commission

Appointment and background

The Adoption Commission (*Adoptionskommissionen*) was appointed by the Löfven III cabinet on October 28, 2021 (directive: 2021:85) in response to reported irregularities and shortcomings in intercountry adoption activities that had occurred both internationally and in Sweden. The inquiry's objective was to assess past practices and propose appropriate legal reforms and other measures. On the same day, the government appointed professor of Civil Law Anna Singer as the special investigator to lead the inquiry.

Despite its name, the Adoption Commission was set up as special investigator inquiry, and not as a commission of inquiry. In practice, this meant that that the special investigator was the main person responsible for organizing the investigation and writing the final report, though in cooperation with the various subject matter specialists and experts attached to the inquiry.

The Löfven III cabinet governed Sweden from 9 July 2021 to 30 November 2021 and was formed on 9 July 2021 in the aftermath of the 2021 government crisis. Like its predecessor, it was a weak minority coalition consisting of the Social Democrats and the Green Party and only had 33% of the seats in the *Riksdag* (the Parliament). However, the appointment of the Adoption Commission was uncontroversial and supported by all the political parties in the *Riksdag*.

Terms of reference, timeframe and cost

The commission directive tasked the commission with

- clarifying the extent of irregularities in Sweden's international adoption activities
- analyzing the legal frameworks, organizational structures, and responsibilities of involved actors
- assessing the need for adoption-specific support services
- proposing measures to strengthen children's rights and legal protections in future international adoptions.

The inquiry was instructed to complete its investigation by 7 November 2023. However, additional directives (2023:113, 2024:86 and 2024:120) extended the timeframe of the investigation first to 16 December 2024, then to 1 March 2025, and finally to 2 June 2025. The additional directives did not contain any further instructions to the inquiry.

Total costs of this commission amounted to around SEK 14 million (£1.1 million) by the end of 2024. Much of this was for salaries. Other costs included per day fees for experts, the running of consultations and administrative costs.

Table 7: costs of the Adoption Commission

	Total 2021-2024 (SEK million)
Salaries	12.5
Per day remuneration	0.4
Travel	0.5
Printing, consultations and other admin	0.8
Total	**14.2**

Commission membership

In addition to the special investigator, Professor Anna Singer, the inquiry contained a number of subject specialists (civil servants) from the Ministry of Justice, the Ministry for Foreign Affairs and the Ministry of Health and Social Affairs, as well as a group of experts representing various adoption-related interest groups and officials responsible for children's welfare as well as two professors, a licensed psychologist and a judge. The inquiry was supported by five secretaries.

In addition, the the inquiry had a 12-member advisory reference group with representatives from various international adoptee organizations attached to it.

How the inquiry operated

The inquiry was organized as a special investigator inquiry, which meant that the special investigator (rather than the chairperson and a number of commissioners as a collective) had the primary responsibility for organizing the inquiry's work and writing the final report. In the English summary of the inquiry's final report, the investigator describes her work as follows:

> "To carry out its remit, the Inquiry has examined archive material from government agencies and organisations as well as adoption files from the 1960s and onwards. A major emphasis has been placed on understanding the practices from a historical perspective. We have interviewed many actors and drawn on adoptees' knowledge and experiences, with respect to identifying irregularities and the need for and design of adoption-specific support." (SOU 2025:61, p. 52).

In later sections, the special investigator discusses in detail her extensive data collection effort, archival work and analysis of legal documents both in Sweden and abroad.

The expert group held eleven meetings during the period of the investigation. At the meetings, the special investigator and the secretariat provided updates about the investigation, raised issues for discussion, and asked for input on the drafts and proposals. The expert group also reviewed the report drafts for accuracy and were able to submit their comments.

The reference group was convened for five joint meetings with the special investigator in 2022–2025. Before the first joint meeting, the investigator held individual meetings with each member or association. At group meetings, the special investigator and the secretariat provided updates on the investigation, raised issues for discussion and presented intended proposals. Additional meetings were held with individual members and associations as needed. The special investigator states that “the reference group has had an important role in providing information and contacts during the investigation” (SOU 2025:61, p. 102).

The special investigator also interviewed officials who have been involved in international adoption activities in Sweden and in other countries, adoptees, adoptive parents, birth parents, researchers, and others with knowledge about or experience with international adoption. In addition, the special investigator had contact with members of similar public inquiries and authorities in other countries and visited four of the countries whose practices were reviewed during the course of the investigation: Chile, Colombia, Poland and South Korea.

The special investigator interviewed around 60 civil servants who had been active in various roles and positions dealing with international adoption from 1960s onwards as well as numerous heads and staff of relevant government agencies, heads of operation of adoption agencies and adoption organizations etc. The special investigator also interviewed about 70 adoptees, 10 adoptive parents, and 20 parents of origin or other family members.

Finally, the special investigator arranged eight focus groups to gather knowledge and experience of support for adoptees and what the adoptees considered adequate support. Three of the groups were for adopted adults, two for adoptive parents, one for parents with children under 18 years old, one for adoptees' partners, and several for children of various ages. Additional focus groups were organized by licensed psychologists commissioned by the inquiry.

The special investigator also notes the contribution of many adoptees, researchers and other interested parties who have contacted her during the investigation and provided information.

Reports and aftermath

The inquiry produced *a two-volume report: Sweden's international adoption activities - Lessons learned and the way forward* (SOU 2025:61), which was published in June 2025. The key conclusion in the reports was that, over several decades, numerous international adoptions to Sweden were marred by illegal and unethical practices. In some instances, Swedish actors were aware of these irregularities at the time; in others, awareness emerged only years later.

The inquiry findings were also presented at a press conference on June 2 2025 by the

special investigator and the Minister for Social Services.

The report recommended the following measures, which were highlighted in the presentation:

- Issuing a formal public apology to adoptees and their families.
- Establishing a national resource center dedicated to providing adoption-specific support.
- Offering financial assistance to adoptees who wanted to visit their countries of origin.
- Tasking the National Board of Forensic Medicine and MFoF (The Swedish Agency for Family Law and Parental Support) with investigating the possibility for establishing of a national DNA database for adoptees.
- Gradually phasing out the practice of international adoptions to Sweden.
- Permitting cross-border adoptions only when there is personal relationship between the prospective adoptive parent and the child, with the state assuming greater responsibility to ensure the child's best interests and legal safeguards are upheld.

In addition, the report recommended specific changes to certain paragraphs of *Föräldrabalken* (section of Swedish law regulating parenthood and guardianship).

The report includes the required impact assessment and estimates for the cost of establishing the national resource center for adoption and other assistance.

Government response

The findings of the Adoption Commissions were well received. The Minister for Social Services Camilla acknowledged the gravity of the commission's findings, stating:

> "*Today, we have gained further clarity that children and parents have suffered and been harmed within the framework of international adoption practices over decades. These revelations understandably evoke strong emotions. The government takes the commission's presentation very seriously, and we will now carefully analyze their conclusions and proposals to make well-considered decisions moving forward.*"[15]

The government has initiated a referral process, inviting feedback from relevant authorities, organizations, municipalities, and the public. Responses are due by 6 October 2025.

[15] "Sweden's international adoption practices under scrutiny." *ALL THINGS NORDIC - News about Scandinavia and the Nordic countries,* June 3 2025. https://all-things-nordic.com/2025/06/03/swedens-international-adoption-practices-under-scrutiny/

Case study 3 (Norway): The July 22 Commission

Appointment and background

The July 22 Commission was appointed by a Royal Decree on August 12 2011. The purpose of the commission was to review the sequence of events of the 2011 Oslo bombing and the following Utøya massacre, to evaluate the emergency response to the attacks, and to make recommendations on how to prevent or respond to future terror attacks. The commission was one of the most important public inquiries in recent Norwegian history (Christensen 2013).

The July 22 2011 attacks were carried out by Anders Behring Breivik, a right-wing extremist, and were the largest mass casualty event in Norway since the Second World War. The first attack was a car bomb explosion in Oslo within the Government Quarter near the office of Prime Minister Jens Stoltenberg. The explosion killed 8 people and injured over 200. The second was a mass shooting event at a youth summer camp on the island of Utøya, where Breivik murdered 69 camp participants and injured many more before he was apprehended by the Police Emergency Response Squad. A shortage of transport helicopters delayed the law enforcement response. The summer camp had been organized by the youth organization of the ruling Norwegian Labour Party (AP). In Breivik's own words, his motivation for the attacks was that the Labour Party was perpetuating "cultural Marxism" and a "Muslim takeover." He had also intended to target the former Labour Prime Minister Gro Harlem Brundtland, who had delivered a speech at Utøya just hours before the attack.

In August 2012, Breivik was convicted and sentenced to 21 years of preventive detention in prison, the maximum allowed sentence, with the potential for indefinite five-year extensions for public safety.

Terms of reference, timeframe, membership and cost

The commission directive stated:

> "The purpose of the inquiry is to conduct a review and evaluation (of the sequence of events related to the July 11 attacks) to prevent or respond to such events in the future, while balancing the recommendations with the goal of preserving central values in Norwegian society such as openness and democracy. The commission shall survey all relevant aspects of the events and may conduct any investigations it deems necessary. The commission will not take a position on criminal liability or other legal responsibility in connection with the events, or assess the police and prosecutors' investigation of the attacks. Nor is it part of the commission's work to estimate the financial extent of damage or loss resulting from the events" (NOU 2012:14, p. 38, translation corrected for clarity).

The commission was also asked to evaluate the ability of Norwegian society and the relevant authorities to:

- detect and prevent terroristic attacks
- to protect against and reduce the consequences of such attacks
- to manage the situation during and after such incidents, including the care of the injured and their relatives.

Finally, the commission was asked to give recommendations for measures to improve future preparedness and their economic and administrative consequences as far as it was possible within the commission's mandate and timeframe. The commission was urged to obtain information from any necessary sources including ministry staff, the police, the health service, external experts, and any of those affected by the attacks.

The terms of reference explicitly state that the Commission would work independently of the Government (the State Council) and the Prime Minister's Office.

The Commission was given a deadline of 10 August 2012.

Table 6. shows the membership composition of the July 22 Commission.

Table 8: Membership of the July 22 Commission (excluding secretaries)

Name	**Occupation**
Alexandra Bech Gjørv (chair)	Lawyer, partner at Hjort law firm, former director of Hydro and Statoil
Ragnar Line Auglend	Researcher at the Faculty of Law, University of Bergen; former Chief of Police in Hordaland, Rector at the Police Academy, judge
Karin Straume	County Medical Officer in Finnmark, Specialist in Community Medicine
Einar Skaarseth Enger	Former CEO of NSB (Norwegian State Railways), Director, Tine (dairy cooperative).
Laila Bokhari	Political scientist, researcher (NUPI, Norwegian Defence Research Establishment, and the Ministry of Foreign Affairs)
Linda Motrøen Paulsen	Department Head at Upper Secondary School in Harstad, Vice President of the Norwegian Red Cross until October 2011.
Torgeir Hagen	Lieutenant General, former Head of the Norwegian Intelligence Service (2002–2010)
Guri Hjeltnes	Journalist and historian, Director of the HL Center (Center for Studies of the Holocaust and Religious Minorities), Professor of Journalism, former Pro-Rector at Norwegian Business School, Oslo
Hanne Bech Hansen	Retired, author, former National Police Commissioner in Copenhagen, Chief of Police in the Danish Security and Intelligence

	Service, and Public Prosecutor for Copenhagen, Frederiksberg, and Tårnby
Stefan Gerkman	Senior Police Superintendent, Finnish Ministry of the Interior

The Recommendation from the Standing Committee on Finance and Economic Affairs on the Revised National Budget for 2012 (Innstilling 2011-2012 nr. 375)[16] mentions that the July 22 Commission was allocated NOK 12 million (£1.1 million). However, the Recommendation notes that the expenditure estimate is likely an underestimate. The Recommendation therefore proposed an increase to the appropriation for the Commission of NOK 5.4 million (£400,000).

How the inquiry operated

The commission organized its work along six sub-projects:

– Counter-terrorism work and surveillance
– Access to and control of weapons and explosives
– Security around the infrastructure of society, and in particular the government quarter – Police operations
– Rescue operations and healthcare management
– National crisis management

Much of the commission's work consisted of collecting and analyzing information related to the attack and terrorist threats in general. To that effect, the commission requested reports, data and documentation from various public bodies. In general, the public bodies responded quickly even though the amount of information requested was extensive. The information included documents, audio logs, figures and statistics, film and photographic material, as well as technical data such as telecommunications data and GPS data.

The commission had 15 meetings, most of which were held over several days.

An important part of the commission's work consisted of obtaining formal testimonies through interviewing survivors, volunteers, health personnel, police officers, ministry employees, officers, leaders, government members and others knowledgeable about the topics within the commission's mandate. The commission first sent a written inquiry to those it wished to hear from. The participants were given information about their rights and obligations, both verbally and in writing, prior to the interview. They were also informed of the topic of the interview, the extent to which they have a duty to give a statement, the relationship to confidentiality provisions, that they have the opportunity to meet with witnesses, that an audio recording would be made and a report written of the interview, and the extent to which their information would be made public and that access may be required under the Personal Data Act. The participants were also been

[16] https://www.stortinget.no/globalassets/pdf/innstillinger/stortinget/2011-2012/inns-201112-375.pdf

given an orientation on the content of the so-called protection against self-incrimination. Following the interview, the participants were given the opportunity to read through and comment on the report from the interview, before signing. The inquiry obtained 123 testimonies.

In addition to the interviews described in the previous paragraph, the Commission and the Secretariat held 166 meetings with key stakeholders, meeting with nearly 700 people. The Commission also visited the government quarter, Utøya, the Sundvolden Hotel, the police stations in Hønefoss and Oslo, the security center in the government quarter and Vålstua Farm. Some of the Commission's members also toured the police and intelligence services in Sweden, Denmark, the United Kingdom and Finland.

Reports and aftermath

The inquiry was finished on August 13 2012. It published a single report titled *Report from the July 22 Commission* (NOU 2012:14) as well as 12 reports from external experts commissioned by the inquiry. The report was sent out for further comments to a number of relevant authorities, organizations, and affected parties, with an unusually short deadline for responses set to September 12, 2012.

The report first described the sequence of the events and how the emergency services and the country's administration responded to them. Subsequent parts of the report examined important aspects of emergency preparedness, including communications issues and the delayed arrival of police helicopters to the scene of the Utøya attack. The report also analysed the national and local police forces' capabilities for responding to terrorism, as well as the command and leadership-related challenges related to emergency responses. Finally, the report analysed police work aimed at preventing terror attacks.

The Commission concluded that the attacks could, to a significant extent, have been prevented, or their consequences reduced, through more effective implementation of security and emergency measures that were already in place.

1. **Attack on the Government Complex:** The commission determined that the bombing in Oslo could have been prevented if previously approved security measures had been implemented as intended.
2. **Police Response at Utøya:** The commission concluded that a faster and more coordinated police operation to protect people on Utøya Island was both possible and realistic. The perpetrator could likely have been stopped earlier. The report noted, in particular, the failure to mobilize police helicopters in a timely manner.
3. **Crisis Management:** The commission found that additional security and emergency measures should have been implemented on 22 July to prevent further attacks and to mitigate their effects.

In particular, the commission identified a number of weaknesses in the police response before and during the Utøya attack, including delays in the release of critical information

concerning the perpetrator and his vehicle, deficiencies in communication and coordination, procedural failures, and inadequate equipment. The commission concluded that the attacks had revealed serious deficiencies in Norway's emergency preparedness and the capacity to respond to complex, coordinated attacks.

Leadership and organizational weaknesses were found to be key contributing factors, rather than a shortage of personnel. Contingency plans designed to address multiple simultaneous attacks were not activated as required. The military was not informed at an early stage, and operational challenges — including the lack of an available police helicopter and the limited capacity of the police transport boat — further delayed the response.

Government Response

After the publication of the report, Prime Minister Jens Stoltenberg faced strong criticism about his government's handling of the events, including calls for him to resign. In an address to the *Storting*, Stoltenberg apologised for the government authorities' failings in responding to the attack and promised several anti-terror measures.[17]

The recommendations in the report have led to a legislative proposal (Prop. 131 L (2012–2013) - Amendments to the Penal Code 1902 and 2005), and multiple administrative and operational changes such as the establishment of a centralized, national police operative, and reorganization within the police administration.

The report's conclusions have also been criticized by Norwegian political scientists, among others. For example, Christensen (2013) argues that, the commission's membership was dominated by lawyers and that this strongly affected the conclusions drawn from the investigation. In addition to lawyers, the commission had strong representation from the business sector.

The legal influence is displayed in the Commission's review of various agencies' crisis responses, which focuses on contrasting the authorities' formal responsibilities, rules and planning, and their "adopted" level of security and emergency preparedness. Similarly, the business sector model of crisis management is used as a model of how the attacks should have been handled. Other relevant perspectives, for example, those of researchers of public administration or organizational theory were lacking.

[17] https://www.bbc.com/news/world-europe-19401598

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