

Brussels, 17.7.2026
SWD(2026) 927 final

ABSTRACT

In Sweden, the level of perceived judicial independence continues to be very high among the general public and is now very high among companies. Work on legislative amendments to the Constitution, aimed in part at strengthening judicial independence, is progressing. While there are no plans to change the nomination system for lay judges, measures are examined by the Lay Judges Association to strengthen their functioning in the courts. Increased financial resources have been allocated to courts for 2026-2028 to address a rising caseload and strengthen court security, while recruitment remains a challenge. A new collective agreement between the National Courts Administration and the judges' trade union clarifies existing safeguards and introduces new measures to ensure that the judges' salary system support judicial independence. The Government is reflecting on further measures to strengthen the right to an effective remedy, while stakeholders continue to highlight key challenges in practice. The justice system continued to function effectively despite a sustained high level of incoming cases, and the digitalisation of justice remained at a very good overall level.

The 2024-2027 Action plan against corruption and undue influence continues to be implemented, with the next strategic document expected to be a comprehensive anti-corruption strategy. The Government proposed further legislative reforms to strengthen the criminal justice framework and improve accountability for corruption in line with international recommendations. While the draft bill does not expand the definition of foreign bribery or introduce a corporate liability for bribery offences, prosecution of such offences has yet to improve. The investigation and prosecution of corruption are overall effective, with certain risks being monitored. While there are no plans to revise the asset declaration regime for public officials, the Government is reviewing relevant guidelines documents and reflects on a reform of the conflicts of interest rules. There is no proposal to change the rules on revolving doors. New legislation strengthens the rules on political party financing and introduces a mandatory lobbying register. The 2021 Whistleblowers Act continues to be implemented and inspections of reporting channels in the private sector have been carried out. Measures are being taken to address the risk of undue influence in public administration and of corruption in public procurement, including through more transparent and reliable procurement data and greater scrutiny of bidders and suppliers.

The independent national regulatory authority, the Swedish Agency for the Media, is taking on an increasing number of responsibilities. Sweden's new Public Service Act came into force in December 2025, updating rules and funding for public service media until 2033. The amended framework for commercial radio channels is now applicable, harmonising regime for analogue and digital commercial radio licenses. Changes to Sweden's public access laws, aimed at addressing privacy and security needs, prompt reactions regarding their impact on transparency. Sweden continues to provide a supportive environment for journalists, with high levels of public trust despite challenges in the evolving media landscape.

Some stakeholders continue to express concerns that the accelerated pace of legislative preparatory work poses challenges to public participation and may in certain cases adversely affect the quality of legislation. Work on legislative amendments to the Constitution, aimed at providing a framework to better deal with serious crises, is progressing. On 1 January 2026, Sweden had no leading judgment of the European Court of Human Rights pending implementation, a decrease of one as compared to the previous year. Civic space remains open, although stakeholders have identified certain challenges in the practical implementation of the recently enacted legal framework for the funding and operation of civil society organisations. The National Human Rights Institution and the Parliamentary Ombudsman continue to discharge their mandates effectively.

RECOMMENDATIONS

Overall, based on the recommendations in the 2025 Rule of Law Report, and considering other developments that took place in the period of reference, the Commission concludes the following:

- No progress has been made on ensuring that the nomination system of lay judges safeguards their independence, as no measures have been introduced. As a national debate over political parties' role in nominations and its impact on lay judges' independence continues, it is recommended to Sweden to *take measures to safeguard the independence of lay judges as regards their nomination and functioning, taking into account European stands on judicial independence.*
- Some progress has been made on the fight against foreign bribery, as draft legislation introduces some relevant provisions. Since its adoption is pending and prosecution of these offences has not improved, it is recommended to Sweden to *strengthen the fight against foreign bribery, including by improving enforcement.*
- No progress has been made to follow up on the inquiry on rules on revolving doors. As no measures are planned in this regard, it is recommended to Sweden to *ensure an appropriate follow-up to the evaluation of the rules on revolving doors.*

I. JUSTICE SYSTEM¹

Independence

The level of perceived judicial independence in Sweden continues to be very high among the general public and is now very high among companies. Overall, 82% of the general population and 89% of companies perceive the level of independence of courts and judges to be ‘fairly or very good’ in 2026². Among the general public, the perceived judicial independence has increased in comparison with 2025 (76%) and significantly increased in comparison with 2022 (74%). The perceived judicial independence among companies has significantly increased in comparison with 2025 (74%), as well as in comparison with 2022 (70%).

Work on legislative amendments to the Constitution, aimed in part at strengthening judicial independence, is progressing. The work on strengthening judicial independence is progressing as part of a broader constitutional reform package³. In October 2025, Parliament adopted the first decision on constitutional amendments aimed at reinforcing the independence of the judiciary and the protection of democracy⁴. It includes elements related to court administration, judicial appointments and disciplinary procedures. This package also includes reforms to strengthen the procedure for amending the Constitution, notably by introducing stricter quorum and majority requirements. As required under the constitutional amendment procedure, a second, confirmatory vote must take place after the parliamentary elections scheduled for September 2026 before the amendments can enter into force, currently envisaged for 1 April 2027.

While no progress has been made on the recommendation concerning the nomination system for lay judges, measures are under consideration by the Lay Judges’ Association to improve their functioning⁵. Lay judges continue to be nominated exclusively by political parties and are formally appointed by municipal councils or county council assemblies⁶. A national debate on the role of political parties in the nomination process is ongoing, with stakeholders calling for reforms to the current system in light of concerns about its impact on lay judges’ independence in certain cases⁷. At the same time, the Lay Judges’ Association is exploring measures to improve the functioning of lay judges in courts. These include the introduction of a more comprehensive training programme from 2027 onwards⁸, joint public awareness-raising activities with the National Courts Administration to highlight the role of

¹ An overview of the institutional framework for all four pillars can be found [here](#).

² Figures 48 and 50, 2026 EU Justice Scoreboard and Figures 51 and 53, 2024 EU Justice Scoreboard. The level of perceived judicial independence is categorised as follows: very low (below 30% of respondents perceive judicial independence as fairly good and very good); low (between 30-39%), average (between 40-59%), high (between 60-75%), very high (above 75%).

³ 2025 Rule of Law Report, Sweden, pp. 3-4.

⁴ Sveriges Riksdag (2026) ‘*The Riksdag votes no to referendum on constitutional matter*’.

⁵ The 2025 Rule of Law Report recommended to Sweden to “Ensure that the nomination system of lay judges safeguards their independence, taking into account European standards on judicial independence.” No progress was previously assessed on this recommendation in 2025.

⁶ 2025 Rule of Law Report, Sweden, pp. 4-5.

⁷ Country visit Sweden, International Commission of Jurists (ICJ), Civil Rights Defenders, Swedish Judges Association, Swedish National Human Rights Institution.

⁸ This training programme, provided for by the National Court Administration, would be divided into several modules instead of the current single-module format. This updated training material is intended to be in place when the next lay judge elections take place in 2027. It should be noted that each court is independent and decides for itself how to use the material provided by the Administration, as well as how much time to allocate to training.

lay judges, and enhanced support for the political parties responsible for nominations⁹ to promote the recruitment of suitable candidates¹⁰. In parallel, the National Audit Institution is conducting a study on the functioning of lay judges in courts which however does not cover the nomination process¹¹. As the Government has not taken specific steps to implement the recommendation, no progress has been made in this area.

Quality

Increased financial resources have been allocated to courts for 2026–2028 to address a rising caseload and strengthen court security, while recruitment remains a challenge. The additional financial resources allocated for the period 2026–2028¹² aim to address a rising caseload and enhance court security, including preparedness measures. This follows several years of substantial funding increases as part of broader investments in the judicial system¹³. The increase in funding has coincided with a significant rise in caseloads, which the National Courts Administration (NCA) attributes in part to broader investments in other parts of the criminal justice system, including additional resources for law enforcement authorities¹⁴. The NCA expects that most courts will use the additional funds for further recruitment and investments in court security¹⁵. Stakeholders have generally welcomed the additional resources. Stakeholders report recruitment challenges driven by an increasing workload, and the growing complexity of cases, which have reduced the attractiveness of the position, as well as by geographical disparities in staff availability¹⁶.

The National Courts Administration and the judges' trade union agreed on a new collective agreement, clarifying existing safeguards and introducing additional measures to support judicial independence with regard to the judges' salary system¹⁷. A new collective agreement was concluded in October 2025 between the National Courts Administration and the judges' trade union¹⁸. The revised agreement specifies that the salaries of judges must not be influenced by their rulings, reinforcing and clarifying safeguards already present in the previous framework. The updated system also introduces mechanisms for resolving disagreements over salary decisions¹⁹. Discussions between the National Courts Administration and the judges' trade union on developing salary criteria for judges are ongoing under the revised agreement. These developments have been generally

⁹ The Lay Judges Association launched a reflection process on recruitment to strengthen the selection process of lay judges. This may include the development of standardised guidance materials for recruiting new lay judges, such as sample interview questions and a more comprehensive description of the role and responsibilities of lay judges.

¹⁰ Country visit Sweden, Lay Judges Association.

¹¹ The review examines whether lay judges are sufficiently representative of the broader population, receive adequate training, and whether their role is effectively managed by the courts. Country visit Sweden, Swedish Supreme Audit Institution.

¹² Over the three-year period, the total additional financial resources amount to EUR 2,443,674,696 EUR (SEK 26,276,072,000).

¹³ 2025 Rule of Law Report, Sweden, p. 5.

¹⁴ Country visit Sweden, National Courts Administration.

¹⁵ This includes measures focused on enhancing both physical security of courts, operational resilience as well as cybersecurity of courts, Swedish National Courts Administration (2026), Annual Report 2025.

¹⁶ Ibid.

¹⁷ The existing salary system – based on a collective agreement combined with individual salary setting for each judge – remains in place.

¹⁸ Country visit Sweden, National Courts Administration, National. Local Salary Agreement, National Courts Administration – Saco-S (2026).

¹⁹ Local Salary Agreement National Courts Administration – Saco-S (2026), section 6.3.2.

welcomed by stakeholders²⁰. The Swedish Judges' Association maintains its criticism of the current salary system²¹.

The Government is reflecting on further measures to strengthen the right to an effective remedy, while stakeholders continue to highlight key challenges in practice²². The Government decided not to proceed with a proposal made by the all-party committee tasked with examining the issues concerning the protection of fundamental rights and freedoms to include a right to judicial review explicitly in the Constitution²³, expressing doubts as to whether it would ensure sufficient protection of the individual's right to judicial review and considering that the matter required further examination²⁴. On June 18, 2026, the Government decided to appoint a new all-party committee of inquiry to investigate whether, and if so how, the right to judicial review needs to be strengthened by enshrining it as a new fundamental freedom and right in the Constitution²⁵. As regards other issues related to access to justice, the financial threshold for legal aid in civil cases has not been adjusted to inflation since 1999, leading to a steady decline in eligibility and, according to some stakeholders, effectively restricting access to legal aid. This situation is considered by some stakeholders to undermine effective access to justice, particularly for individuals with limited financial resources. They also consider that this is further exacerbated by the absence of collective redress mechanisms, which discourages litigation due to potentially substantial financial risks²⁶. However, the Government notes that there is national legislation that allows for group proceedings²⁷.

Efficiency

The justice system continued to function effectively despite a sustained high level of incoming cases, and the digitalisation of justice remained at a very good overall level. The number of incoming civil and commercial litigious cases has remained comparatively low in 2024, while the number of incoming administrative cases remained comparatively high in 2024²⁸. The estimated time needed to resolve litigious civil and commercial cases at all court instances remains comparatively short²⁹. The estimated time needed to resolve administrative cases at all court instances also remains comparatively short (81 days at first instance, 75 days at second instance and 57 days at third instance)³⁰. The clearance rate for civil and commercial litigious cases has increased³¹, while it has decreased for administrative

²⁰ Country visit Sweden, Swedish Bar Association.

²¹ They consider that this remuneration system is not transparent and is vulnerable to interference through the remuneration of (individual) judges, 2025 Rule of Law Report, Sweden, pp. 5-6. Instead, they argue for a more transparent, seniority-based system with predetermined progression steps. Country visit Sweden, Swedish Judges Association.

²² 2025 Rule of Law Report, Sweden, pp. 6-7.

²³ In January 2025, the committee delivered its report. It noted that Swedish law does not provide for a generally applicable constitutional right to judicial review, in contrast to the provisions contained in the European Convention on Human Rights and the EU Charter of Fundamental Rights, 2025 Rule of Law Report, Sweden, pp. 6-7.

²⁴ Swedish Government (2026), written input, p.5.

²⁵ Country visit Sweden, Swedish Government.

²⁶ Country visit Sweden, ICJ and Civil Rights Defenders.

²⁷ See for example Group Proceedings Act (2002:599).

²⁸ Figures 2-3, 2026 EU Justice Scoreboard.

²⁹ In 2024, 150 days at first instance, 85 days at second instance and 209 days at third instance. Figure 6, 2026 EU Justice Scoreboard.

³⁰ Figure 8, 2026 EU Justice Scoreboard.

³¹ 99% in 2024 compared to 93% in 2023, Figure 10, 2026 EU Justice Scoreboard.

cases³². The number of pending litigious civil and commercial cases at first instance is one of the lowest among Member States³³. According to the National Courts Administration (NCA), in 2025 the courts saw an increase in the number of cases filed by 4% compared to 2024 and saw an increase in decisions taken of 3% compared to 2024. The increase in the number of cases has been most pronounced in the district courts³⁴. With respect to digitalisation, the NCA is working on developing a new case management system and is actively engaged in innovation initiatives, including exploring the use of artificial intelligence to streamline operations while maintaining information security. Nevertheless, some gaps remain in digital solutions for conducting and following criminal proceedings³⁵, including electronic access for victims and defendants to ongoing cases, online access to first-instance court judgments, and machine readability of judgments³⁶.

II. ANTI-CORRUPTION FRAMEWORK

The perception among experts, citizens and business executives is that Sweden is one of the least corrupt countries in the world. In the 2025 Corruption Perception Index by Transparency International, Sweden scores 80/100 and ranks 3rd in the European Union and 6th globally³⁷. This perception has deteriorated over the past five years³⁸. The 2025 Special Eurobarometer on Corruption shows that 53% of respondents consider corruption widespread in their country (EU average 71%) and 13% of respondents feel personally affected by corruption in their daily lives (EU average 30%). As regards businesses, 36% of companies consider that corruption is widespread (EU average 65%) and 10% consider that corruption is a problem when doing business (EU average 37%). Furthermore, 34% of respondents find that there are enough successful prosecutions to deter people from corrupt practices (EU average 38%), while 56% of companies believe that people and businesses caught for bribing a senior official are appropriately punished (EU average 31%)³⁹.

The 2024-2027 Action plan against corruption and undue influence continues to be implemented, while the next strategic document is expected to be a comprehensive national anti-corruption strategy with measurable objectives and monitoring indicators. The Action Plan represents the most comprehensive strategic anti-corruption document to date in Sweden⁴⁰. The forum of seven agencies⁴¹ is now progressing with identifying areas

³² 99.7% in 2024 compared to 105.1 in 2023, Figure 11, 2026 EU Justice Scoreboard.

³³ Figure 13, 2026 EU Justice Scoreboard.

³⁴ 89 670 ongoing cases at the end of 2024 compared to 85 086 ongoing cases at the end of 2021. Country visit Sweden, National Courts Administration.

³⁵ 2025 Rule of Law Report, Sweden, p. 5.

³⁶ Figures 45, 46 and 47, 2026 EU Justice Scoreboard. The government notes that the parties to a proceeding may, upon request, have access to all documentation in the case in electronic form.

³⁷ The level of perceived corruption is categorised as follows: low (above 79); relatively low (between 79-60), relatively high (between 59-50), high (below 50).

³⁸ In 2021 the score was 85, while, in 2025, the score is 80. The score significantly increases/decreases when it changes more than five points; improves/deteriorates (changes between 4-5 points); has been relatively stable (changes from 1-3 points) in the last five years.

³⁹ Data from Special Eurobarometer 573 (2026) and Flash Eurobarometer 582 (2026).

⁴⁰ OECD (2025), Integrity Review of Sweden, p. 28.

⁴¹ The forum of six agencies is a government-mandated coordination group of key Swedish authorities jointly responsible for reviewing the current Action Plan. The Swedish Economic Crime Authority was formally added to the forum of six agencies, enhancing cross-agency collaboration. Country visit Sweden, Swedish Government.

not addressed in the current Action Plan. Following the 2025 OECD Integrity Review⁴², the forum along with the Agency for Public Management have been tasked with drafting an end-of-term report and contributing to developing a new anti-corruption strategy. The new strategy is expected to include risk analysis, goal-setting, indicators and follow-up processes⁴³.

The Government proposed further legislative reforms to strengthen the criminal justice framework and improve accountability for corruption in line with international recommendations. On 15 January 2026, the Government referred a draft bill⁴⁴ to the Council on Legislation, proposing increased penalties for bribery (including for its aggravated forms), gross breach of trust, gross fraud, gross embezzlement and trading in influence⁴⁵. The Government submitted the final bill to Parliament on 9 April 2026. The reform is complemented by another government bill⁴⁶ also submitted to Parliament on the same day⁴⁷, proposing a criminal offense for abuse of public office and an expanded liability of public officials for intentionally misusing their official power. The bill also aims to address corruption risks, infiltration and undue influence, particularly from organised crime. The Government reported that the proposed amendments will help align Sweden with international standards⁴⁸, as they address a number of legislative gaps⁴⁹.

There has been some progress to address the recommendation to strengthen the fight against foreign bribery⁵⁰. The aforementioned government bills⁵¹, submitted to the Parliament on 9 April 2026, contain several measures addressing sanctions of bribery, as well as related offences and the introduction of a new corruption offence. Some of these measures are relevant for the fight against foreign bribery. The Committee of Inquiry⁵² recommends in its report, among other things, introducing a new offence of negligent financing of corruption, aimed at addressing corporate risk-taking⁵³ and making it easier to bring actions on corporate fines, and abolishing the requirement of dual criminality for corruption offences committed abroad, which could facilitate the prosecution of foreign bribery cases. Stakeholders consider

⁴² The adoption of a comprehensive anti-corruption strategy has also been recommended by the OECD in its Integrity Review of Sweden, a broad review by the OECD requested by the Swedish Government. OECD (2025), p. 26, and Country visit Sweden, Agency for Public Management.

⁴³ Country visit Sweden, Swedish Government.

⁴⁴ The draft bill is based on the Inquiry on Criminal Law Reform, appointed in June 2025, which in its report (SOU 2025:66) proposed inter alia increased penalties for a wide range of offences, Swedish Government (2026), written input, p. 7.

⁴⁵ Swedish Government (2026), written input, p. 7.

⁴⁶ The draft bill is based on the Inquiry on measures under criminal law against corruption and official misconduct (SOU 2025:87).

⁴⁷ Country visit Sweden, Swedish Government.

⁴⁸ United Nations, United Nations Convention against corruption (adopted 31 October 2003, entered into force 14 December 2005) Art 19. Article 19 of the UNCAC encourages States to criminalise intentional misuse of official powers in violation of law to obtain an undue advantage, even where no bribery or payment is involved. Country visit Sweden, Swedish Government.

⁴⁹ In its Integrity Review, the OECD also noted especially the need to expand accountability for corruption, improve enforcement by strengthening legal provisions on the reporting of corruption, corporate criminal liability and sanctions, and ensure that all corruption offences have aggravated variants, OECD (2025), p. 11.

⁵⁰ The 2025 Rule of Law Report recommended to Sweden to “strengthen the fight against foreign bribery, including through amending the existing legal framework and improving enforcement.” Some progress was assessed on this recommendation in 2023 and 2024 and no further progress was assessed in 2025.

⁵¹ See footnotes 45 and 47.

⁵² The Committee of Inquiry, established in February 2024 with a broad mandate to review criminal law legislation on corruption, delivered its report in July 2025.

⁵³ Under the current framework, prosecution must establish that the funds were in fact used for a bribe.

that the recommended changes represent a step forward, although the bill does not expand the definition of foreign bribery, nor introduce criminal liability for companies⁵⁴. The recommendations of the Committee, which have been subject to consultation with relevant stakeholders, are now being considered within the Government Offices⁵⁵. There has been no increase in reported cases of foreign bribery, with one investigation currently ongoing⁵⁶. Overall, while there has been no increase in investigating and prosecuting foreign bribery cases, the government bills approved by Parliament introduce some elements relevant for the fight against foreign bribery, and the outstanding recommendations of the Committee on further legislative action are under consideration. Therefore, there has been some progress on this recommendation.

The investigation and prosecution of corruption are overall effective, while certain risks, including underreporting and new corruption modalities, continue⁵⁷ to be monitored by law enforcement. Resources for the Swedish Police Authority's National Anti-Corruption Unit (NACU) are reported as sufficient for the current workload. Efforts are underway to broaden NACU's investigative scope beyond pure bribery cases, to include professional misconduct, embezzlement, fraud, and the misuse of confidential information⁵⁸. According to the National Council for Crime Prevention, in 2025, active bribery was reported 184 times, passive bribery 202 times, and trading in influence and negligent financing of bribery 18 times⁵⁹. No high-level corruption cases were reported. Between 1 November 2024 and 1 November 2025, 99 corruption-related cases⁶⁰ were investigated by the Swedish Police Authority, compared to 105 cases in 2024⁶¹. 13 prosecutions were initiated in 2025, resulting in 13 judgments in the same year⁶². The Swedish Police Authority estimates that many cases continue to go unreported, especially at the regional and municipal level. Links between bribery and other offenses such as violence, threats, extortion, and conflicts of interest are increasingly recognised⁶³. The Financial Intelligence Centre, set up in April 2025, has so far achieved results on asset confiscations⁶⁴, while its impact on corruption cases is expected to materialise as expertise increases⁶⁵. There was no corruption-related case handled by the EPPO in Sweden in 2025⁶⁶.

Measures are being taken to address the risk of undue influence in public administration. There is an increased awareness of the risks connected with infiltration of

⁵⁴ Country visit Sweden, Transparency International Sweden.

⁵⁵ Swedish Government (2026c), additional written input, p. 6.

⁵⁶ In addition, international legal cooperation remains a significant barrier to effective investigation and prosecution. Country visit Sweden, Prosecution Service.

⁵⁷ 2025 Rule of Law Report, Sweden, p. 9.

⁵⁸ Country visit Sweden, Prosecution Service.

⁵⁹ Swedish Government (2026c), p. 9. In 2024, Sweden recorded 67 active bribery cases, 76 passive bribery cases and 9 cases of trading in influence. National Council for Crime Prevention (2026), additional written input, p. 1.

⁶⁰ The cases involve breaches of trust, taking and giving of bribes, trading in influence, negligent financing of bribery, wrongful voting and misconduct. Police National Anti-Corruption Unit (2025), Corruption in Sweden – a situational picture, p. 5.

⁶¹ 19 cases were prosecuted, and 30 judgments were handed down during the period, of which 29 convictions, Swedish Police Authority, National Anti-Corruption Unit (2025), Corruption in Sweden – a situational picture, pp. 4-5.

⁶² Swedish Police (2026), written contribution, p. 1.

⁶³ Country visit Sweden, Prosecution Service.

⁶⁴ Country visit Sweden, Swedish Government.

⁶⁵ The Centre can help detect corruption by identifying irregularities in money flows or through efforts aimed at detecting insiders within banks, Swedish Government (2026), written input, p.6.

⁶⁶ EPPO (2026), Annual report 2025, p. 57.

the public service by organised crime through corruption. On 1 July 2025, the Local Government Act introduced obligations for municipalities and regions to protect local and regional politicians from threats and violence, helping reduce the risk of undue influence. In addition, a training programme on undue influence in the public administration is now available online⁶⁷.

While there are no plans to revise the asset declaration regime for public officials, the Government is reviewing relevant guidelines documents and reflecting on a reform of the conflicts of interest rules. The Government is analysing⁶⁸ the OECD 2025 Integrity Review, which urges Sweden to clarify and harmonise conflicts of interest rules. It also calls for strengthened asset and interest declaration requirements and central oversight so that conflicts can be more effectively detected, disclosed, and managed across the public sector⁶⁹. Guidelines on the holding of financial instruments were revised in December 2025 to clarify conflicts of interest risks and provide clearer support for ministers and state secretaries on reporting and managing financial interests⁷⁰. The revised ethical guidelines for civil service within the Swedish Government that came into effect on 2 June 2026 include a section on anti-corruption and core public values⁷¹. A voluntary training program on undue influence is now available online for public administration employees⁷².

Parliament has adopted legislation providing for an obligation for lobbyists to register and disclose their contacts with political decision-makers. The legislation will enter into force on 1 July 2027⁷³. Following the report of the all-party committee and the OECD recommendations⁷⁴, a draft bill on increased transparency of political processes was submitted to the Legislative Council on 3 March 2026⁷⁵, which has completed its scrutiny. The legislation requires legal entities to register their lobbying contacts with policymakers and include information such as the topics, counterparts, methods and frequency of contacts. It also establishes oversight and enforcement mechanisms, with a public register and sanctions for non-compliance, to increase public insight into efforts to influence political decisions. The proposed lobbying register would align the legislative framework with international standards⁷⁶. Stakeholders welcome the proposal, while noting that extending the

⁶⁷ Swedish Government (2026), written input, p. 5.

⁶⁸ Swedish Government (2026), written input, p.5.

⁶⁹ Sweden meets 44% of OECD criteria on the strength of conflict-of-interest regulations and none on practice, compared to OECD averages of 76% and 40%. The 2025 OECD Integrity Review recommends improving management of outside interests and financial disclosures, strengthening verification and transparency, clarifying the framework, and enhancing guidance, awareness, and proactive risk management, OECD (2025), pp. 124 -142.

⁷⁰ Country visit Sweden, Swedish Government. The updated guidelines include a new section concerning the risks of conflicts of interest that can arise from the holding of financial instruments. Swedish Government (2026), written input, p.6.

⁷¹ Ethical Guidelines of the Government Offices of Sweden (2026), pp.1-10 .

⁷² Country visit Sweden, Swedish Government.

⁷³ The Government Bill 2025/26:258, Increased Transparency in Political Processes was adopted by Parliament on 16 June 2026. Swedish Government (2026c), pp 9-10.

⁷⁴ In its 2025 Integrity Review of Sweden, the OECD recommends that Sweden introduces a dedicated lobbying law, increases transparency of lobbying activities, establishes a lobbying register and disclosure system, defines lobbying in a comprehensive manner, creates oversight and enforcement mechanisms and covers indirect and foreign lobbying, OECD (2025), pp. 85 - 115.

⁷⁵ Once the legal opinion of the Council on Legislation is obtained, the government can revise the proposal and then submit it to the parliament for debate and adoption. The entry into force is planned for July 2027.

⁷⁶ Country visit Sweden, Swedish Government. The updated guidelines include a new section concerning the risks of conflicts of interest that can arise from the holding of financial instruments. Swedish Government (2026), written input, p.6.

rules to regional and local level could also be considered, given the highly decentralised way of decision-making in Sweden⁷⁷.

There has been no progress on the recommendation to follow up on the inquiry on rules on revolving doors⁷⁸. A committee of inquiry recommended in 2023 to extend the scope of revolving door rules beyond ministers and state secretaries, introduce a general framework for other public employees, require notifications of moves to the private sector and set a maximum duration of restrictions⁷⁹. The proposals remain under consideration within the Government Offices⁸⁰. Civil society also supports the adoption of measures regarding post-employment restrictions⁸¹. There has therefore been no progress on this recommendation.

Recently adopted legislation strengthens the rules on political party financing, aligning the Swedish framework with international standards and recommendations. The law, increasing transparency of political processes⁸², also aims to strengthen the rules on political party financing⁸³, to ban foreign political donations, and to expand financial reporting obligations for political parties to include both income and expenditure as well as assets and liabilities. Moreover, the law clarifies the definition of a donor and bans anonymous and disguised donations. In addition, non-monetary contributions such as free services or labour would also have to be reported. Administrative sanctions would be imposed for breaking the rules. Stakeholders have noted that a potential gap may remain in the proposed system of banning foreign donations, with a possibility for foreign donors to route money through a Swedish intermediary⁸⁴. Overall, the law is expected to contribute to aligning the Swedish framework with international standards and GRECO, EU⁸⁵ and OECD recommendations⁸⁶. In its 2025 Annual Report, the Swedish Legal, Financial and Administrative Services Agency opened five enforcement cases in 2025 (down from 10 in 2024) and received one external complaint regarding party financing oversight⁸⁷.

The 2021 Whistleblowers Act continues to be implemented and inspections of reporting channels in the private sector have been carried out. The Whistleblower Act⁸⁸ continued

⁷⁷ Country visit Sweden, Transparency International Sweden.

⁷⁸ The 2025 Rule of Law Report recommended to Sweden to “ensure an appropriate follow-up to the evaluation of the rules on revolving doors.” No progress was assessed on this 2024 recommendation in the 2025 Rule of Law Report. The Committee of Inquiry was appointed in 2022 and it submitted its report in 2023. The OECD also recommends that Sweden develops revolving doors policies and post-public employment measures, such as cooling-off periods and targeted restrictions in high-risk areas (such as public procurement), OECD (2025), p. 174-175.

⁷⁹ Swedish Government (2023), ‘Transitional restrictions – increasing trust in public services. Report on the Inquiry into Transitional restrictions in Public Activities’, pp. 15 – 236.

⁸⁰ Swedish Government (2026c), p. 8.

⁸¹ Country visit Sweden, Transparency International Sweden, and Liberties (2026), Rule of Law Report p. 832.

⁸² See footnote 73, p.10.

⁸³ Amending Act (2018:90) on transparency of party funding.

⁸⁴ Country visit Sweden, Transparency International Sweden. See also Transparency International Sweden, Referral of the report “Greater Transparency in Political Processes” (SOU 2025:52) (Ref. No. Ju2025/01117).

⁸⁵ Commission Recommendation (EU) 2023/2829 of 12 December 2023 on inclusive and resilient electoral processes in the Union and enhancing the European nature and efficient conduct of elections to the European Parliament.

⁸⁶ Sweden remains one of few countries without restrictions of foreign donations to political parties and candidates, OECD (2025), p. 106.

⁸⁷ Legal, Financial and Administrative Services Agency (2026), Annual Report 2025, p. 83.

⁸⁸ Act (2021:890) on protection of persons who report wrongdoings.

to be applied. In 2024⁸⁹ the Work Environment Authority recorded 121 whistleblowing reports⁹⁰. The Authority recently carried out inspections in the private sector⁹¹ and will publish the results in a report⁹². A 2026 investigation by a media outlet found inconsistencies in how different Swedish authorities handle whistleblowing reports, noting that only a very small number of reports have led to disciplinary or criminal proceedings⁹³. The Government notes that the administrative implementation of the whistleblowing framework by the relevant authorities reflects their high institutional independence, and that some reports filed through whistleblowing channels fall outside the scope of the Whistleblowing Act⁹⁴.

Measures are being taken to address the risk of corruption in public procurement, such as enhancing the transparency and reliability of procurement data and increasing scrutiny of bidders and suppliers. Businesses' attitudes towards corruption in the EU shows that 30% of companies in Sweden (EU average 30%) think that corruption has prevented them from winning a public tender in practice in the last three years. 85% of companies perceive the level of independence of the public procurement review bodies (administrative courts) as very or fairly good, which has significantly increased in comparison with 2025 (64%)⁹⁵. The Single Market and Competitiveness Scoreboard on access to public procurement in Sweden reports 23% of single bids for 2024 (27% EU average). A number of challenges persist⁹⁶, also taking into account the high proportion of government services outsourced to the private sector⁹⁷. Digitalisation and centralisation of procurement data have been identified as desirable by stakeholders⁹⁸. The Government has introduced several measures to reduce corruption risks in public procurement. Alongside reforms of corruption offences⁹⁹, the Government has tasked the Swedish Agency for Public Management with proposing how a national public procurement database and an analytical function for procurement data and purchasing can be established to enhance transparency. The purpose of the dedicated data analytics function is to monitor procurement and purchase data to flag potential corruption¹⁰⁰. The National Audit Office is preparing a performance audit on public procurement, addressing also possible irregularities¹⁰¹. Beside public procurement, other sectors representing a high corruption risk include construction and infrastructure, law enforcement, transport, healthcare and social care¹⁰². Other risk factors include bribery

⁸⁹ Swedish Government (2026), written input, Annex 2.

⁹⁰ The reports were received from a wide range of sectors: most of them (74) concerned protection of privacy and personal data, and public procurement (19). There is no data disaggregation on reports concerning corruption.

⁹¹ The inspections, carried out in November 2025 and March 2026, looked into 72 workplaces. 80 % of the inspected workplaces were asked to address the identified issues. Swedish Government (2026b), written input, p. 1.

⁹² Swedish Government (2026b), p.1, Work Environment Agency (2025), Whistleblowing inspection.

⁹³ Publikt (2026), Major differences in how whistleblowers are handled.

⁹⁴ Swedish Government (2026b), p.1.

⁹⁵ Figure 59, 2026 EU Justice Scoreboard.

⁹⁶ These risks include, notably, organised crime infiltrating procurement, differing practices due to decentralisation, and legal gaps, such as an unclear conflict-of-interest definitions, weak revolving doors restrictions and limited enforcement against favouritism, see also OECD (2025), pp. 168 – 188.

⁹⁷ During the country visit, the Confederation of Swedish Industries reported that public procurement spending amounts to 18% of GDP in Sweden, with the EU average being around 13%.

⁹⁸ OECD (2025), pp. 183 – 192. See also country visit Sweden, Confederation of Swedish Industries and Transparency International Sweden.

⁹⁹ See footnote 45, p. 6.

¹⁰⁰ Country visit Sweden, Swedish Government.

¹⁰¹ It is scheduled for publication in October 2026. Country visit Sweden, National Audit Office.

¹⁰² Institute Against Corruption, “Corruption offence judgments in Sweden 2025”, pp. 4–8.

through cryptocurrencies, as well as the proliferation of corruption brokers and the growing risk of corruption in critical sectors, such as the security industry¹⁰³.

III. MEDIA PLURALISM AND MEDIA FREEDOM

The independent national regulatory authority, the Swedish Agency for the Media, is taking on an increasing number of responsibilities. In November 2025 the Government assigned the Swedish Agency for the Media a new mission to develop a regular survey to monitor threats, violence and harassment faced by journalists¹⁰⁴. The assignment also included designing appropriate methods to compare risks over time and identify partners for collaboration, and has transmitted to the Government a proposal setting out the methodology for conducting such future surveys. The Agency has also taken on expanded responsibilities under new laws that came into force in 2026¹⁰⁵. These include monitoring media ownership transparency, preventing market monopolies, maintaining a database of media owners, and protecting editorial independence. To support these efforts, the Government has increased the Agency's budget for 2026, funding its new regulatory duties¹⁰⁶. The Agency currently considers its resources sufficient to carry out these tasks¹⁰⁷. The MPM 2025 continues to indicate a very low risk regarding the independence and effectiveness of the media authority¹⁰⁸.

Sweden's new Public Service Act came into force in December 2025, updating rules and funding for public service media. The Public Service Act took effect in December 2025, updating the rules for public service media¹⁰⁹. It clarifies their mission, funding and leadership appointments, bringing provisions on public service into a single, clearer framework¹¹⁰. In December 2025, the Government decided on the public service mission for the period 2026-2033, including how much funding the public service companies will receive, following guidelines set by Parliament¹¹¹. While the reform's goals are generally supported¹¹², Swedish public service media continue to express some concerns about financial sustainability and risks to their independence¹¹³. Stakeholders emphasise that rising costs for security, resilience, and distribution are straining budgets, especially as public broadcasters must maintain both traditional terrestrial broadcasts and digital services, while many commercial broadcasters have moved to providing their services only online¹¹⁴. Only the public broadcasters Swedish Radio and Swedish Television are now using the terrestrial

¹⁰³ In the security industry this covers bribes to security and port guards to gain access to facilities and smuggle goods, Swedish Police Authority, National Anti-Corruption Unit (2025), Corruption in Sweden – a situational picture, p. 4.

¹⁰⁴ Swedish Government (2026), written input p. 10, Swedish Government Decision of 20 November 2025, Ku2025/01086.

¹⁰⁵ Swedish Government (2026), written input p. 9-10, Swedish Act (2025:1408); Swedish Act (2025:1242).

¹⁰⁶ Swedish Government (2026), written input p. 9-10, Swedish Agency for the Media (2026), written input pp. 14-15.

¹⁰⁷ Country visit Sweden, Swedish Agency for the Media.

¹⁰⁸ 2026 Media Pluralism Monitor, country report for Sweden, p. 17.

¹⁰⁹ Swedish Government (2026), written input, p. 8, Swedish Act (2025:986).

¹¹⁰ Swedish Government (2026), written input, p. 8.

¹¹¹ *ibidem*.

¹¹² 2025 Rule of Law Report, Sweden, p. 13.

¹¹³ Stakeholders mention that the current funding framework fails to fully account for actual costs. They also point out that the new remit introduces continuous reviews on productivity, impartiality, and efficiency. In their view, this shift not only diverts resources from core operations to administrative burdens, but also risks politicising public trust, as some political parties increasingly allege bias in public service media, Swedish Educational Radio (UR) (2026), Country visit Sweden, Swedish Television (SVT).

¹¹⁴ UR (2026).

network covering all the country. Some stakeholders note structural challenges in the media sector, including the shift of advertising revenues away from traditional journalism to global digital platforms¹¹⁵, as well as the growing concentration of media ownership in larger corporate groups¹¹⁶. The Swedish Agency for the Media has increased support for news media in areas with limited local coverage¹¹⁷.

The amended framework for commercial radio channels now applies, harmonising the regime for analogue and digital commercial radio licenses. An amendment to the Radio and Television Act came into effect in November 2025, making the rules for licensing and broadcasting the same for analogue and digital commercial radio¹¹⁸. The broadcasting fee for analogue commercial radio has been replaced with an annual fee based on advertising revenue. The objective of the amendment is to strengthen the long-term viability of commercial radio while fostering independent media. Swedish media stakeholders have generally supported these changes¹¹⁹. On 22 January 2026, the Government decided not to proceed with its legislative proposal that would have allowed the revocation of broadcasting licenses on national security grounds¹²⁰. The Government reasoned that such a measure would amount to a disproportionate restriction of freedom of expression and unlikely to be effective, since harmful actors could still broadcast via satellite or other means even if their terrestrial license was revoked¹²¹.

Changes to Sweden's public access laws aimed at addressing privacy and security needs, prompted reactions regarding their impact on transparency. On 2 December 2025, the Swedish Government proposed an amendment to the Freedom of the Press Act, preventing public access to data stored on digital devices seized during criminal investigations, though once formally included in cases files, the data would then become accessible under public access laws¹²². The Government considers that this proposed change will align public access rights with suspects' rights and strengthens privacy, with the change set to take effect on 1 January 2027, if approved¹²³. Meanwhile, the Public Access to Information and Secrecy Act is under frequent amendment¹²⁴, with recent changes expanding data-sharing between authorities for crime prevention and addressing NATO security requirements¹²⁵. Stakeholders have voiced concerns over growing legal restrictions and tighter access to information in practice, citing increased document classification making it harder to obtain public records¹²⁶. The Media Ombudsman observes that Sweden maintains a relatively high level of transparency¹²⁷.

Sweden continues to provide a supportive environment for journalists, with high levels of public trust despite challenges in the evolving media landscape. The MPM 2026 continues to assess the protection of freedom of expression as carrying a low-risk score in

¹¹⁵ Country visit Sweden, SVT.

¹¹⁶ Country visit Sweden, Media Ombudsman.

¹¹⁷ UR (2026).

¹¹⁸ Swedish Government (2026), written input, p. 8.

¹¹⁹ 2025 Rule of Law Report, Sweden, p. 13.

¹²⁰ Swedish Government (2026), written input, p. 9.

¹²¹ Swedish Government (2026).

¹²² Swedish Government (2026), written input p. 10; Swedish Government Proposal 2025/26:71.

¹²³ *ibidem*.

¹²⁴ Country visit Sweden, Swedish Government.

¹²⁵ Swedish Act (2009:400).

¹²⁶ Country visit Sweden, Swedish Union of Journalists, Media Ombudsman, SVT, UR (2026).

¹²⁷ Country visit Sweden, Media Ombudsman.

Sweden¹²⁸. Since the publication of the 2025 Rule of Law Report, no new alerts were registered by the Council of Europe’s Platform to promote the protection of journalism and safety of journalists. The Mapping Media Freedom monitoring report has identified 4 incidents, 3 of which concern impersonation of journalists in AI-generated videos. Media stakeholders highlight that trust in Swedish media, including public service media, remains strong, with high audience numbers and broad reach¹²⁹. Stakeholders also consider that journalists face increasing criticism and political pressure¹³⁰, and some have called for more support in that regard¹³¹. The Media Ombudsman notes that journalists at major media organisations have strong institutional and legal support¹³². The Swedish Agency for the Media is working to improve journalists’ safety by organising events, publishing reports on the current situation and collaborating with stakeholders, including serving as a focal point for the Council of Europe’s journalist safety campaign¹³³. The legislation with the aim to transpose the EU Anti-SLAPP Directive has been adopted and covers cross-border cases¹³⁴.

IV. OTHER INSTITUTIONAL ISSUES RELATED TO CHECKS AND BALANCES

Some stakeholders continue to express concerns that the accelerated pace of legislative preparatory work poses challenges to public participation and may in certain cases adversely affect the quality of legislation¹³⁵. In 2025, the Government launched 334 public consultations on legislative initiatives. The average deadline for these public consultations was 12.6 weeks¹³⁶. Some civil society stakeholders have expressed concerns that the rapid pace of legislative developments makes it challenging to maintain a clear overview of initiatives across sectors, effectively limiting opportunities for stakeholder input¹³⁷. The Government also used shortened inquiry times for eight legislative initiatives considered urgent and politically important¹³⁸. In respect to constitutional checks, over the past year the Government submitted 142 legislative proposals to the Council on Legislation, which issued negative opinions in nine cases¹³⁹. Of these, four proposals were nevertheless submitted to Parliament without changes, three were submitted following partial adjustments, and two were fully revised before submission¹⁴⁰. The Council on Legislation has raised concerns that some legislation is prepared too hastily, limiting opportunities for stakeholder input and, in some cases, affecting the quality of the final legislation¹⁴¹.

Work on legislative amendments to the Constitution, aimed at providing a framework to better deal with serious crises, is progressing. In December 2025, the Parliament

¹²⁸ 2026 Media Pluralism Monitor, country report for Sweden, p. 13.

¹²⁹ Country visit Sweden, Swedish Agency for the Media, Media Ombudsman, SVT.

¹³⁰ Country visit Sweden, Swedish Union of Journalists, Media Ombudsman, SVT.

¹³¹ Country visit Sweden, Swedish Union of Journalists.

¹³² Country visit, Sweden, Media Ombudsman.

¹³³ Country visit Sweden, Swedish Government.

¹³⁴ Swedish Government (2026), Act (2026:241) on the protection of participation in public debate in disputes with cross-border implications.

¹³⁵ 2025 Rule of Law Report, Sweden, pp. 14-15.

¹³⁶ Swedish Government (2026a).

¹³⁷ Country visit Sweden, Swedish ICJ - Civil Rights Defenders, Swedish National Human Rights Institution. Under the relevant OECD Indicators of regulatory policy and governance (iREG), Sweden scores slightly below the EU average on stakeholder engagement.

¹³⁸ This covers those legislative initiatives that had a consultation period of 30 weeks or less, Swedish Government (2026a).

¹³⁹ Country visit Sweden, Swedish Government.

¹⁴⁰ Country visit Sweden, Ministry of Justice.

¹⁴¹ See for example Council on Legislation Opinion on government’s proposed criminal law reforms.

voted to adopt the first decision on amendments to the Instrument of Government concerning constitutional preparedness¹⁴². The proposal includes amendments that will strengthen Parliament's ability to convene in certain difficult situations and specific rules meaning that the Parliament, with a qualified majority of three-quarters of the voters, should be able to grant the government special powers to adopt provisions in certain crisis situations. Since the proposals contains constitutional amendments a second decision of identical wording must be made by the Parliament after the parliamentary elections in the fall of 2026. The amendments are proposed to enter into force on 1 January 2027¹⁴³.

More than two thirds of companies surveyed in Sweden express confidence in the effectiveness of investment protection. 88% of companies are very or fairly confident that investments are protected by law and courts, a figure which has increased in comparison with 2025 (76%)¹⁴⁴. As regards authorities relevant for economic operators, 82% of companies perceive the level of independence of the national competition authority (The Competition Authority) as very or fairly good¹⁴⁵. The Supreme Administrative Court has jurisdiction in some business-related cases, including in cases related to public procurement and economic regulation. A number of judicial mechanisms to improve efficiency are available in these cases, including the possibility to apply interim measures and to consolidate multiple appeals¹⁴⁶.

On 1 January 2026, Sweden had no leading judgment of the European Court of Human Rights pending implementation, a decrease of one compared to the previous year¹⁴⁷. The only remaining case concerning insufficient safeguards in bulk signals-intelligence gathering was closed by the Committee of Ministers in June 2025¹⁴⁸. As regards the respect of payment deadlines, on 31 December 2025 there were no cases awaiting confirmation of payments (same as in 2024)¹⁴⁹. By 17 June 2026, the number of leading judgments pending implementation had remained 0¹⁵⁰.

The National Human Rights Institution and the Parliamentary Ombudsman continue to discharge their mandates effectively¹⁵¹. The Swedish National Human Rights Institute has been accredited with 'A' status by the Global Alliance of National Human Rights Institutions (GANHRI) since November 2024¹⁵². The Swedish National Humans Rights Institute considers that it has adequate funds to carry out its ongoing level of operations¹⁵³. In October 2025, the Government appointed two new members to the Institute's Governing Board. The

¹⁴² Govt. Bill 2024/25:155.

¹⁴³ Swedish Government (2026a).

¹⁴⁴ Figures 52 and 53, 2026 EU Justice Scoreboard. Only 4% and 3% of the surveyed investors respectively perceive the frequent changes in legislation or concerns about the quality of the law-making process and concerns about quality, efficiency or independence of justice as a reason for the lack of confidence in investment protection.

¹⁴⁵ Figure 60, 2026 EU Justice Scoreboard.

¹⁴⁶ Figures 66 and 67, 2026 EU Justice Scoreboard. The data presented reflects exclusively the mechanisms in place at the level of the highest administrative jurisdictions; the same or other mechanisms may be in place at lower instance administrative courts.

¹⁴⁷ For an explanation of the supervision process, see the [website](#) of the Council of Europe.

¹⁴⁸ Judgment of the ECtHR, 35252/08, *Centrum for Rattvisa v. Sweden*. European Implementation Network (2026), written input, p. 9.

¹⁴⁹ Council of Europe (2026), p. 163.

¹⁵⁰ Data according to the online database of the Council of Europe (HUDOC).

¹⁵¹ 2025 Rule of Law Report, Sweden, pp. 16-17.

¹⁵² 2025 Rule of Law Report, Sweden, pp. 16-17.

¹⁵³ Country visit Sweden, Swedish National Human Rights Institution.

new members were nominated by universities and colleges in accordance with the provisions in the law governing the Institute¹⁵⁴. The Parliamentary Ombudsman consider that they have adequate resources and report good cooperation with public authorities as well as adequate follow-up to their recommendations¹⁵⁵. The Parliamentary Ombudsman reported a significant increase in complaints concerning general courts, mainly related to lengthy proceedings¹⁵⁶. No similar increase has been observed in administrative courts. In 2025, the complaints to the Parliamentary Ombudsman increased by around 33% to 15.369 in total, the highest number in the history of that body¹⁵⁷.

Civic space remains open, although stakeholders have identified certain challenges in the practical implementation of the recently enacted legal framework for the funding and operation of civil society organisations. Sweden is considered to have an ‘open’ civic space by Civicus¹⁵⁸. As of 1 January 2025, a new regulatory framework establishing a ‘democracy condition’¹⁵⁹ for state support to religious communities and for grants from the General Inheritance Fund came into effect. Efforts are ongoing to extend an equivalent condition across other funding schemes for civil society organisations¹⁶⁰. To support implementation, the Swedish Agency for Youth and Civil Society (MUCF) has been tasked by the Government with supporting both grant-awarding public bodies in applying the democracy condition and civil society organisations in understanding the new requirements. Measures include providing guidance to both grant-awarding authorities and CSOs, including through dedicated information resources, training tools and stakeholder outreach activities¹⁶¹. Stakeholders have expressed some concerns regarding the application and interpretation of the democracy condition¹⁶². In March 2026, MUCF published a report on structured meetings with civil society organisations to gather feedback on its implementation. The report noted concerns that several key concepts underpinning the democratic condition remain insufficiently defined, creating a risk of inconsistent interpretation by civil society organisations and inconsistent application by grant-giving authorities. Certain CSOs also highlighted concerns about increased administrative burden and uneven application across different authorities and levels of government¹⁶³. In parallel, additional public funding of EUR 6.85 million (SEK 74 million) has been allocated to support security-enhancing measures for organisations exposed to threats, violence and harassment¹⁶⁴.

¹⁵⁴ Swedish Government (2026), written input, p. 11.

¹⁵⁵ Country visit Sweden, Parliamentary Ombudsman.

¹⁵⁶ This can be largely attributed to judicial staff shortages and recruitment difficulties, particularly in Northern Sweden, Country visit Sweden, Parliamentary Ombudsman.

¹⁵⁷ Parliamentary Ombudsman (2025), p. 16.

¹⁵⁸ Sweden’s score is 81/100. Ratings by Civicus are on a five-category scale defined as: open, narrowed, obstructed, repressed and closed.

¹⁵⁹ These conditions apply to those who apply for state grants. According to this condition, an organisation’s purpose needs to be compatible with the values of a democratic society, and it needs to be democratically organised, respect the ideas of democracy in its activities, including the principles of equality and non-discrimination, 2025 Rule of Law Report, Sweden, pp. 17 – 18.

¹⁶⁰ To date, 45 ordinances of grant-awarding bodies have been amended to implement the democracy condition, Swedish Government (2026), written input, pp. 12-13.

¹⁶¹ Country visit Sweden, Swedish Agency for Youth and Civil Society (MUCF).

¹⁶² Country visit Sweden, ICJ, Civil Rights Defenders.

¹⁶³ Swedish Agency for Youth and Civil Society (2026), *Dialogue on the implementation of democratic conditions*, p. 8

¹⁶⁴ Swedish Government (2026), written input, p. 13.

Annex I: List of sources in alphabetical order*

* The list of contributions received in the context of the consultation for the 2026 Rule of Law report can be found at https://commission.europa.eu/publications/2026-rule-law-report-targeted-stakeholder-consultation_en

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Annex II: Country visit to Sweden

The Commission services held physical and virtual meetings in March 2026 with:

- Agency for Public Management
- Civil Rights Defenders
- Confederation of Swedish Industries
- Economic Crime Authority
- International Commission of Jurists (ICJ)
- Media Ombudsman
- Ministry of Culture
- Ministry of Finance
- Ministry of Justice
- National Audit Office
- National Council for Crime Prevention
- National Courts Administration
- Office of the Parliamentary Ombudsman
- Office of the Prime Minister
- Secretariat of the Constitution Committee
- Supreme Administrative Court
- Supreme Court
- Swedish Agency for the Media
- Swedish Bar Association
- Swedish Confederation of Industries
- Swedish Educational Radio (UR)
- Swedish Government
- Swedish Institute for Human Rights
- Swedish Judges Association
- Swedish Lay Judges Association
- Swedish National Human Rights Institution
- Swedish Police Authority, including Special Investigation Department
- Swedish Prosecution Authority
- Swedish Publishers' Association
- Swedish Section of the International Commission of Jurists
- Swedish Supreme Audit Institution
- Swedish Television (SVT)
- Swedish Section of the International Commission of Jurists
- Swedish Union of Journalists
- Transparency International Sweden

* The Commission also met the following organisations in a number of horizontal meetings:

- Civil Liberties Union for Europe
- Civil Society Europe
- End FGM EU
- European Civic Forum
- European Partnership for Democracy
- Human Rights Watch
- ILGA-Europe

- International Federation for Human Rights
- Philea - Philanthropy Europe Association
- Transparency International EU