



Ministry for Foreign Affairs
Director-General for Legal Affairs

The Special Rapporteurs
signatories to the Joint
Communication
AL SWE 3/2026

Office of the High Commissioner
for Human Rights
Palace of Nations
CH-1211 GENEVA 10
Switzerland

Joint Communication from Special Procedures

Reference: AL SWE 3/2026

Dear Special Rapporteurs,

I have the honour of referring to the Joint Communication of 25 February 2026 (“the Communication”) in which the Swedish Government (“the Government”) is invited to submit observations regarding the situation for human rights defenders in Sweden. On behalf of the Government, I have the privilege to submit the following in response to the invitation.

The Government remains at the disposal of the Special Rapporteurs, should any further information be requested.

1. Additional information and/or comments

1. The Government is fully committed to the promotion and protection of human rights, gender equality, democracy, and the rule of law. The Government’s long-term efforts to ensure full respect for human rights permeates a range of policy areas and involve civil society. The Government adopted a national strategy for its work with human rights in 2016, which remains valid open-endedly.

2. The Government would in this context also like to refer to Sweden’s fourth Universal Periodic Review (“UPR”) in May 2025. A critical part of the UPR was the national consultations with civil society, human rights defenders and other

stakeholders, leading up to the national report. Sweden will continue to actively consult and collaborate with civil society, human rights defenders, representatives of vulnerable groups and other stakeholders in monitoring the human rights situation and in implementing the 203 accepted recommendations. The Government consider the in total 315 recommendations received in 2025 as valuable contributions to ensure the full respect for Sweden's international human rights obligations. Several issues that are raised in the appeal of the Special Rapporteurs were also addressed in the debate. The Government appreciated the many positive acknowledgements regarding Sweden's commitment to human rights during the UPR sessions.

3. In Sweden, the free formation of opinion is one of the foundations of the state. According to the Swedish Constitution everyone shall be guaranteed freedom of expression, freedom of assembly, freedom to demonstrate and freedom of association in his or her relations with the public authorities. These fundamental freedoms may only be restricted for certain purposes and under specific conditions set out in the Constitution. For example, the restriction may only be imposed to satisfy purposes acceptable in a democratic society and may never go beyond what is necessary with regard to the purposes for which it was imposed, nor may it extend so far that it represents a threat to the free shaping of opinion as one of the foundations of democracy. The freedom of the press and freedom of expression in certain media enjoy special constitutional protection (see para 7).

4. The freedom of expression and the freedom of assembly and association are also protected by the European Convention for the Protection of Human Rights and Fundamental Freedoms. Sweden has incorporated the Convention into Swedish law. The Swedish Constitution gives the Convention a special status stating that no act of law or other provision may be adopted which contravenes Sweden's undertakings under the Convention.

5. As regards the Government's general policy in relation to the civil society, the following can be noted. In December 2009 the Government submitted a government bill entitled *A Policy for Civil Society* (Govt. Bill 2009/10:55) to the Swedish Parliament, which adopted the Government's proposals. The policy highlights the great importance of civil society, develops and clarifies the relationship between the state and the civil society and takes a holistic approach to general issues concerning civil society and its conditions. The policy also addresses issues concerning civil society entrepreneurship, state support to civil society

organisations, other civil society funding and issues regarding public meeting places.

6. The objective of the Government's civil society policy is to improve the conditions for civil society as an integral part of democracy. This is to be done in dialogue with civil society organisations by:

- developing opportunities for civil society to help people become involved, based on commitment and a desire to influence their own lives or society in general;
- strengthening the opportunities for civil society to contribute to the development of society and welfare as a collective voice and opinion-maker, and with a variety of activities; and
- deepening and spreading knowledge about civil society.

7. In relation to what is stated regarding journalists in the Communication, the Government wishes to underline that the protection for the freedom of the press and the freedom of expression is strong in Sweden. Editorial independence is protected by the Swedish Constitution, namely by the Freedom of the Press Act and the Fundamental Law on Freedom of Expression, as well as by EU regulations such as the European Media Freedom Act. The state is not allowed to interfere with the media's content, ownership, or editorial decisions except in exceptional cases and only if explicitly provided for in the fundamental laws. For example, it can be possible to intervene if the content constitutes a criminal act according to the constitutional rules. Independent news media are an important part of democracy and should be given the best possible conditions to operate in their markets on a commercial basis. A new, technology-neutral media support introduced by the Government is intended to promote access to news coverage throughout the country and contribute to a diversity of general news journalism and bolster local journalism.

8. Regarding the information received by the Special Rapporteurs concerning the activities of the Swedish Police Authority, the Government wishes to emphasize that the police carry out their duties in strict accordance with national legislation, international human rights obligations, and relevant United Nations conventions. The Swedish Police Authority has an explicit mandate to safeguard fundamental freedoms and rights, including the rights to peaceful assembly and freedom of expression, and it works continuously through training, monitoring,

and oversight to ensure that all interventions are conducted lawfully, proportionately, and without discrimination.

9. In other respects, the Government refers to what is stated in the following sections.

2. Measures related to decision-making, funding and support

Overview of how civil society is involved in decision-making

10. In the preparation of legislation, the referral process is a central part where civil society organisations have the opportunity to submit comments. Giving civil society the opportunity to express its views is a key principle of the Government, especially on issues that affect them. In 2024, the Government Offices sent a total of 152 referrals to 2,239 civil society organisations, with a response rate of 69 percent.

11. As a complement to the referral procedure, in 2018 the Government introduced thematic consultation forums (*sakeråd*) as a working method in the Government Offices. Such forums aim to strengthen forms of consultation primarily with civil society organisations, but also with other actors. They are used when there is a need for more in-depth decision support on substantive issues.

12. Dialogue between the Government and civil society organisations is an important basis for the civil society policy. The Government Offices have about 40 permanent forums for consultation with civil society organisations. In addition to these permanent forums, between 150 and 200 meetings with civil society organisations are held annually on various individual issues.

13. The Government has also worked with civil society organisations to reach an agreement on dialogue and consultation between the Government and such organisations. The cooperation operates under the name *Nationellt organ för dialog och samråd mellan regeringen och det civila samhället* (National body for dialogue and consultation between the Government and civil society). The body aims to solve common issues and supplement existing dialogue structures, including a formalised dialogue format with civil society called *Partsgemensamt forum*.

Overview of government grants to civil society

14. State support for civil society is channelled through various types of public grants. The grants are usually divided into general grants and targeted grants, where the general grants, e.g. so-called organisational grants, account for a larger proportion and are more long-term, while targeted grants, e.g. project grants, usually apply to shorter efforts.

15. The organisational grants are distributed without the requirement for a specific activity or performance and aim to ensure the very existence of the organisation.

16. According to the latest budget bill, the government distributes SEK 23 billion to civil society. Some of it goes directly to specific organisations, but most of it is distributed by different agencies. Currently, grants are distributed by approximately 40 agencies and with the support of around 60 ordinances. Conditions for each grant are stated in ordinances. The agencies are responsible for decisions on grants based on the relevant regulations and for managing payment and follow-up.

17. A new regulatory framework introducing a democracy condition for state grants from the General Inheritance Fund and for state support to religious communities came into effect on 1 January 2025. Since then, efforts have been underway to incorporate an equivalent democracy condition, consistent with that applied to the General Inheritance Fund, into the regulations governing other forms of funding to civil society. During 2025, approximately 45 regulations have been amended.

Measures in relation to specific groups

18. As regards the Government's general policy in relation to national minorities, the Government submits the following. The five national minorities in Sweden are Jews, Roma, Sami, Sweden Finns, and Tornedalians. The Sami are also recognised as an indigenous people. The Swedish Agency for Youth and Civil Society ("MUCF") and the Sami Parliament are tasked with distributing government grants to organisations representing the national minorities. The purpose of the grant is to provide these organisations with strengthened conditions to work towards promoting the participation and inclusion of the minority groups. Additional funding was temporarily allocated during 2022–2024.

19. The Government holds annual consultation meetings with each national minority. In addition, the Government holds consultation meetings with the national minorities in specific matters when needed.

20. In 2022, the Act on Consultation with the Sami People entered into force. According to the act, the Government, government agencies, regions and municipalities are as a rule obliged to consult the Sami Parliament and if relevant reindeer herding communities and/or Sami organisations concerned by a decision when deciding on issues that are of certain concern to the Sami people.

21. In November 2023, the Truth and Reconciliation Commission for the Tornedalians, Kvens and Lantalaïset submitted its final report. The report showed, among other things, that the minority's language, culture and identity were disparaged and belittled, made shameful and rendered invisible. The Government has, after the report was submitted, prioritised a close dialogue with the minority and measures that will promote reconciliation and contribute to redress. One such measure is additional funding to civil society organisations such as [REDACTED].

22. At the request of the Sami Parliament (*Sametinget*) and following a feasibility study carried out by the Sami Parliament, the Truth Commission for the Sami People was appointed as a committee of inquiry by the Government in November 2021. The Commission will submit its final report on 30 September 2026.

23. The Government's work in accordance with its long-term strategy for Roma inclusion continues, with one of the priority areas being gender equality. Since 2013, the Government Offices has a close dialogue with the Roma reference group, which serves the purpose to ensure that Roma have the opportunity to participate and influence the implementation of the strategy for Roma inclusion.

24. The Government has adopted a national strategy to strengthen Jewish life and combat antisemitism for the period 2025–2034. The objective is to lay the foundations for more targeted and coordinated efforts and create better conditions for Jewish life in Sweden. The strategy includes, among other measures, efforts to combat hate crime. In developing the strategy, two consultations were held with Jewish organisations and organisations working to combat antisemitism and for Holocaust remembrance.

25. The Government organises thematic consultation forums with civil society organisations on the work to combat various forms of racism, including antimuslim racism, antisemitism and anti-gypsyism, on a regular basis. These consultation forums are primarily connected to the implementation of the Government's action plan to combat racism and hate crime, as well as the above-mentioned national strategy to strengthen Jewish life and combat antisemitism. MUCF annually distributes government grants to activities to combat racism and similar forms of intolerance, including antimuslim racism, antisemitism and anti-gypsyism.

26. The Government also organises thematic consultation forums with civil society organisations on the work to promote the rights and opportunities of LGBTIQ persons on a regular basis. These consultation forums are primarily connected to the implementation of the Government's action plan for equal rights and opportunities for LGBTIQ persons. MUCF annually distributes government grants to organisations for homosexuals, bisexuals, transsexuals or persons with a transgender identity or expression.

27. Two Swedish agencies are distributing annual government grants to the civil society's work towards increased gender equality. The total yearly, and permanent, amount is approximately SEK 285 million, which is the highest level ever for those grants. Of those money, SEK 185 million is targeting the civil society's work with women's shelter.

28. In relation to defenders of the rights of persons with disabilities, the Disability Delegation is of central importance, as it is the Government's coordination body for deliberations and mutual information for the entire government and an opportunity for all government ministers to engage in dialogue with the disability movement and vice versa. The National Board of Health and Welfare is responsible for distributing government grants to organisations of persons with disabilities. The purpose of such grants is to support disability organisations in their work to achieve equality in living conditions and full participation in society for persons with disabilities.

29. In relation to environmental rights defenders, Sweden has a long tradition of public participation in decision-making processes in the environmental area. Permit processes involve consultations with the public before a permit application is submitted to the permit authority, the publication of notice of the application

and the gathering of opinions from the public, a public meeting before the permit authority; and the publication of a notice of the permit authority's ruling.

3. Measures related to smear campaigns and stigmatisation

30. The Government is committed to address smear campaigns and stigmatisation of human rights defenders in Sweden. Recent measures in this regard includes the following.

31. The Government has recently adopted the bill Transposition of the directive on the protection of persons participating in public debate and introduction of a new default judgement. The bill implements Directive (EU) 2024/1069 of the European Parliament and of the Council of 11 April 2024 on protecting persons who engage in public participation from manifestly unfounded claims or abusive court proceedings, often referred to as the anti-SLAPP directive, which aims at strengthening the protection of individuals participating in public debate. The proposals in the bill include a new law that strengthens the protection of journalists, human rights defenders, and others who participate in public debate. The bill also proposes a new default judgment sanction that enables courts to issue a default judgment against a party that does not respond to court orders, if there are special reasons to do so. This is intended to make the handling of civil cases more efficient. The legislative changes take effect on 1 May 2026.

32. Crimes committed against a person because he or she has carried out journalistic work constitute an attack not only on the individual victim but ultimately also on democracy and society as a whole. In order to strengthen the protection under criminal law for journalists, a specific aggravating circumstance was introduced 2023 for offences committed against a person on grounds of them, or a family member, has professionally engaged in news reporting or other journalistic activities.

33. In relation to the information received by the Special Rapporteurs concerning LGBTIQ rights defenders being targeted on e.g. social media or by e-mail, the Government has tasked the Swedish Defence Research Agency with surveying the prevalence of LGBTIQ hostility in digital environments. The task includes producing analysis reports and disseminating knowledge gained within the framework of the task.

4. Measures related to a safe and enabling environment

34. Recent measures to ensure a safe and enabling environment for human rights defenders in Sweden include the following.

35. Free journalism is fundamental to an open and democratic society. Threats and hate directed at journalists in the course of their work are a widespread problem that affects both individuals and democratic society. Sweden is working intensively to create favourable conditions for the media industry as a whole and to increase the safety of journalists. This also includes measures to work proactively to decrease threats and hatred, to monitor the development of exposure over time and to ensure that support is available when needed.

36. Since 2018, the government has allocated funds to meet the need for security-enhancing measures among civil society organisations whose activities are affected by fear of threats, violence, and harassment. The support is administered by MUCF. At present, the grant is SEK 74 million. In addition, the Jewish Central Council will receive an additional SEK 10 million in grants. The main beneficiary is, and has been since the introduction of the support, various Jewish organisations.

37. To prevent and address exposure to hate and threats directed at female and male journalists respectively – and, in particular, to strengthen newsrooms' capacity to manage attacks and harassment of a sexual nature – Linnaeus University has been assigned a multi-year mandate to identify, develop, and implement capacity-building measures targeting journalists and editorial offices. The assignment is to be reported in March 2027.

5. Measures and policies related to the rights to freedom of peaceful assembly and association for human rights defenders

38. At the outset, the Government refers to what is stated in section 1 above on the rights to freedom of peaceful assembly and association for human rights defenders in Sweden.

39. In relation to administrative burdens, bureaucratic demands and adequate funding for civil society organisations, the Government has in section 2 above provided an overview over measures adopted in that regard.

40. The Government may add that to assist both civil society organisations and grant-awarding bodies in application processes for grants, MUCF – acting on behalf of the Government – has established a dedicated support function. This function is intended, among other objectives, to promote a uniform application of the new democracy condition (see para. 17 above), which is a matter of central importance to civil society. In addition to funds for this support function, the agency has since 2024 also been provided with funds to establish a function to support civil society organisations in developing their ability to handle the necessary requirements for administrative procedures.

41. In this context the Government also wishes to mention that in 2024, new rules entered into force on the impact assessments that must be conducted before committees of inquiry, special inquiries and government agencies submit proposals for new regulation (ordinance on impact assessments, *förordningen* (2024:183) *om konsekvensutredningar*). Such impact assessments are an essential part of the Swedish decision-making process to assess the impact of proposals on the public and private sector, civil society and others, including to make sure that unnecessary administrative burdens and bureaucratic demands are avoided. In January 2024, the Government instructed the National Financial Management Authority (*Ekonomistyrningsverket*), now the Agency for Public Management (*Statskontoret*), to develop a framework for guidance on impact assessments in accordance with the new ordinance, and to provide related advisory support (Fi 2024/01483). In the work of developing the framework, the agency is instructed to obtain and take into account knowledge and methodological guidance from, among others, MUCF on the impacts on civil society. The Agency for Public Management shall submit its final report on 15 April 2027 at the latest.

42. In relation to potential chilling effects on the exercise of the rights to freedom of peaceful assembly and association, the Government notes the following. In any analysis of criminal law provisions that may affect the exercise of those rights, it is of significant importance to the Government that the risk of any potential chilling effect for human rights defenders is properly taken into account. Any such criminal law provision must reflect an appropriate balance between, on the one hand, the importance of safeguarding the fundamental rights and freedoms and, on the other hand, the interest that justifies the provision. Any restriction of these rights must of course comply with legality, necessity and proportionality requirements.

6. Final remarks

43. In conclusion, the Government wishes to underline the importance that it attaches to the civil society and human rights defenders and maintaining a close dialogue and cooperation to promote and protect human rights. The Government will continue to listen to the views and input of all concerned stakeholders and will continue to address challenges and emerging issues to improve the human rights situation for everyone and everywhere in Sweden.

44. The Government remains firmly committed to the promotion and protection of human rights as well as to ensuring full respect for Sweden's international human rights obligations.

Yours sincerely,



Therese Hyden