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The Swedish Disability Rights Federation position on the enhanced EU Disability Rights Strategy

The Swedish Disability Rights Federation is a national umbrella for organisations of persons with disabilities founded in 1942, with 54 member organisations representing approximately 400 000 persons. We are active members of the European Disability Forum, EDF.

We confirm the support for [EDF position](#) on the updated strategy. EDF has also published their view on [ten key UN recommendations](#) from the constructive dialogue 2025.

In addition to the EDF positions, we would like to add the following.

Structure and focus on Disability Rights legislation

We have really appreciated that the structure of the first part of the EU Disability Rights Strategy 2021-2025 had 64 politically decided concrete measures with an open access to the monitoring framework. In many countries, and especially in Sweden (as confirmed by the CRPD observations in 2024), we have seen regression on disability rights. It has been going on for many years, but it is now escalating with lack of implementing the human rights model of disability, cutbacks and increased income gaps for citizens in need of disability benefits.

We would like to emphasise the importance of the European Union taking a leading role in defending and promoting disability rights for the 100 million disabled European population, but also for global human rights and a reminder to leave no one behind in Agenda 2030.

Our answers in the survey about the Disability Rights strategy might show lack of impact on disabled persons lives. It is mainly related to the lack of implementation by member states and even national regression. That is also why we strongly believe that EU must choose legislative and budget measures with tools for infringement and enforcement, as voluntary guidance is seldom implemented.

We would like to highlight the following:

- Give priority to integrating UN CRPD recommendations to ensure legislation, budget/funding, access to justice for disability rights and systematic implementation in EU and member states.
- Publish a follow up table with reasoning and measures on all the recommendations from UNCRPD committee, to show an example and emphasise the human rights-based approach. (See annex attached with an AI-generated table with summary of recommendations, where we tentatively added priorities).
- Decide and use indicators inspired by [the resource package developed by the UN](#) for CRPD and SDGs in Europe. Publish yearly follow up reports on results on performance in member states, including special funding for research like ANED.
- Develop and implement a standard for active involvement of national councils in the Disability Platform. Today there is no link between the national government and the national disability rights council. For example, national positions on the strategy did not involve OPD:s, not in line with CRPD article 4.3.
- Ensure that EU funding is used for inclusion. Introduce remedies to prevent funding not in line with the CRPD.
- Ensure recommendations related to Disability Rights in the country reports related to the European semester. Despite big equality gaps and input from national OPD:s there are seldom recommendations on disability to the member states.
- We suggested already in 2019, an institution, inspired by the US Access Board to ensure an open process for development of accessibility standards and monitoring of application of universal design to all new products, services and facilities open to the public as well as enforcement of EU directives. We would like to add a one stop shop for complaints mechanism to this institution. Encouraging member states to use EU funding for national mirroring Access Boards (following polish example).
- Legislative solutions to solve the blocked update of the equality directive to ensure protection from discrimination as well as protection from hate crime and hate speech in line with CRPD.