

Executive fact sheet

# Sweden's Digital Accessibility Laws



# Introduction

Like many other European Union (EU) Member States, Sweden has enacted digital accessibility laws impacting both private and public entities. The country was among the first in the EU to pass a transposition of the European Accessibility Act (EAA), which applies to private businesses. (A transposition integrates a higher-level EU directive into a Member State's national laws.) Sweden's EAA transposition impacts most businesses that serve consumers in the country, regardless of where they're based.

Additionally, public-sector organizations in Sweden must meet digital accessibility requirements under two laws that transpose the EU Web Accessibility Directive (WAD).

Navigating the intricacies of Sweden digital accessibility regulations can be complex. This resource is designed to help senior executives understand the essence of these laws and what is required for compliance.



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# Overview of Sweden's digital accessibility laws

| Law   | Description  | Sectors impacted  | Compliance standard |
|---|--|---|---------------------|
| <b>Lag ("Law") (2018:1937)</b>              | Sweden's transposition of the EU WAD                                 | Public organizations (directly impacted), private businesses that sell to the public sector (indirectly impacted) | EN 301 549          |
| <b>Förordning ("Ordinance") (2018:1938)</b> | A regulation containing supplementary provisions for Lag (2018:1937) | Public organizations (directly impacted), private businesses that sell to the public sector (indirectly impacted) | NEN 301 549         |
| <b>Lag ("Law") (2023:254)</b>               | Sweden's transposition of the EAA                                    | Private businesses  | EN 301 549          |
| <b>Förordning ("Ordinance") (2023:676)</b>  | A regulation containing supplementary provisions for Lag (2023:254)  | Private businesses  | EN 301 549          |

## Unpacking digital accessibility laws in Sweden

The following sections of this resource provide more information about the specific digital accessibility laws impacting organizations operating in Sweden, including the entities they apply to, the requirements for compliance, and how they're enforced.

## Laws impacting public-sector and business-to-government (B2G) organizations

### Lag (“Law”) (2018:1937)

#### Summary:

Part of Sweden’s transposition of the EU WAD, Lag (2018:1937) mandates that digital services provided by public authorities in Sweden meet the WAD’s accessibility requirements. It applies to public entities such as state and municipal authorities, educational institutions, and healthcare providers, as well as certain private entities receiving public funding or operating public-sector functions. Private businesses that sell digital products to public-sector organizations in Sweden must also ensure these products satisfy the law’s requirements, or risk losing business.

While websites and mobile applications fall under the law’s definition of “digital services,” other digital experiences—such as live broadcasts and non-navigation maps—may be exempt. The standard for compliance is EN 301 549, the harmonized European digital accessibility standard.

#### Requirements:

To comply with Lag (2018:1937), organizations must bring their websites, mobile applications, and other covered digital services into conformance with the latest version of EN 301 549. This European standard incorporates the Web Content Accessibility Guidelines (WCAG) version 2.1 and provides additional criteria. At a high level, conforming with EN 301 549 means ensuring digital services are perceivable, operable, understandable, and robust for all users.

Organizations covered by Lag (2018:1937) are also required to publish, and regularly update, an accessibility statement that details their level of conformance with EN 301 549.

## Lag (“Law”) (2018:1937) (continued)

### **Enforcement:**

The Swedish Agency for Digital Government (DIGG) is the primary regulatory body overseeing compliance with Lag (2018:1937). This agency is responsible for monitoring digital services provided by public authorities, ensuring they meet the law’s accessibility requirements.

While Lag (2018:1937) itself does not specify penalties, non-compliance could lead to corrective actions. If, through monitoring or after reporting, the DIGG finds that an entity has not fully satisfied the law’s requirements, they will notify the public entity to correct deficiencies.

In the case that deficiencies are not corrected, the DIGG may decide to instruct the public entity to take measures to fulfill the requirements. These corrective measures may be accompanied by a fine and / or invite public scrutiny.

## Förordning (“Ordinance”) (2018:1938)

### Summary:

This ordinance outlines supplementary provisions for [Lag \(2018:1937\)](#), and is part of Sweden’s transposition of the EU WAD impacting the public sector. These provisions include exemptions to Lag (2018:1937), such as time-dependent media published before September 23, 2020 and documents published before September 23, 2018 that are no longer needed for active administrative processes.

The provisions in the ordinance also grant the DIGG the authority to issue regulations regarding technical accessibility requirements for Lag (2018:1937), as well as regulations regarding the form and content of accessibility statements.

### Requirements:

The ordinance itself does not specify any technical requirements for accessibility, but rather clarifies exceptions to Lag (2018:1937) and allows for the issuance of new requirements under that law.

### Enforcement:

The ordinance complements Lag (2018:1937) and follows the same enforcement proceedings.



## Laws impacting private businesses

### Lag (“Law”) (2023:254)

#### Summary:

Lag (2023:254) is Sweden’s full transposition of the EAA. In alignment with the EAA, it sets accessibility requirements for consumer products and services such as banking, e-commerce, transportation, and consumer electronics. The presumptive technical standard for compliance is EN 301 549, and businesses that fail to comply may face penalties.

Förordning (2023:676) establishes additional regulatory provisions for Lag (2023:254) concerning the accessibility of certain products and services in Sweden.

#### Requirements:

The requirements for compliance with Lag (2023:254) align with the general requirements for EAA compliance. Covered products and services may only be released to the market if they meet the accessibility requirements regarding information, user interface, and functional design specified by the EAA. These requirements should be satisfied through conformance with EN 301 549.

Conformance with EN 301 549 involves adhering to digital accessibility best practices including:

- Ensuring compatibility with assistive technologies like screen readers.
- Offering flexible input methods.
- Providing alternatives for visual and auditory content.

## Lag (“Law”) (2023:254) (continued)

### Requirements (continued):

Exemptions may apply to products and services in certain cases, such as when the nature of a product or service will be fundamentally altered by the addition of accessibility features, or accessibility imposes a disproportionately large burden on the manufacturer or service provider.

In such cases, the manufacturer or service provider may submit documentation justifying their exemption. Micro-enterprises (businesses with fewer than 10 employees, or an annual turnover or balance sheet not exceeding € 2,000,000) do not need documentation to qualify for an exemption.

### Enforcement:

Compliance with Lag (2023:254) will be monitored by various regulatory bodies, including the Swedish Post and Telecom Authority, the Swedish Consumer Agency, and the Transport Agency. Each agency will surveil products and services relevant to its purview.

Non-compliance could result in corrective actions mandated by the relevant authorities, and businesses may be required to remedy accessibility issues. Penalties ranging from SEK 10,000 to SEK 10,000,000 may also be levied according to the seriousness and extent of the violation.

## Förordning (“Ordinance”) (2023:676)

### Summary:

This ordinance contains supplementary provisions for [Lag \(2023:254\)](#), Sweden’s transposition of the EAA. These include provisions on market surveillance and requirements regarding technical documentation for products and services.

### Requirements:

To comply with this ordinance, manufacturers and service providers must create technical documentation that contains:

- An assessment of a product or service’s conformance to accessibility requirements.
- A description of a product’s design, manufacturing details, and functionality.

Additionally, the ordinance mandates that a separate EU declaration of conformity must be drawn up for each product model.

### Enforcement:




Supervision of compliance with Förordning (2023:676) falls within the scope of different supervisory authorities:

- The Swedish Post and Telecom Authority oversees the issuance of regulations regarding enforcement, and supervises electronic communications, banking services, and e-commerce.
- The Swedish Agency for Accessible Media supervises e-books and similar media.
- The Swedish Consumer Agency and Swedish Transport Agency supervise specific aspects of passenger transport services.

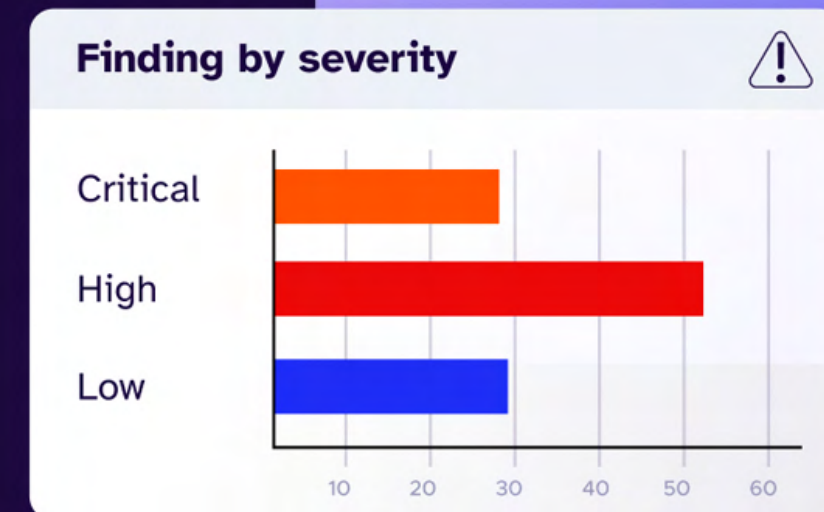
Penalties for non-compliance align with the penalties outlined in [Lag \(2023:254\)](#).

# Start your journey to compliance

To comply with current digital accessibility laws in Sweden and stay ahead of the 2025 EAA enforcement deadline, we recommend that your organization start by taking the following actions:

-  Audit your digital assets for conformance with EN 301 549.
-  Swiftly address existing accessibility issues in your digital assets.
-  Publish a detailed accessibility statement, and regularly update this document.

Third-party digital accessibility solution providers, like Level Access, can help you understand your legal obligations and equip you with advanced technology, expert support services, and training to ensure all assets in your portfolio are accessible and compliant.



## Let's get started

Engage our team to make accessibility a priority now. An investment in digital accessibility today is an investment in the sustainability and success of your company tomorrow.

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