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### Introduction

The European Women's Lobby (EWL), the largest umbrella organisation of women's non-governmental organisations in the European Union (EU) welcomes the publication of the European Commission's Roadmap for Women's Rights¹ (hereafter referred to as the Roadmap), which paves the way for the new Gender Equality Strategy for 2026–2030. The EWL believes that the Roadmap moves in the right direction to safeguard rights of women and girls across the European Union (EU). We very much welcome a strong political commitment to keeping women's rights and gender equality at the core of the political agenda, which stresses the importance of women's rights organisations and civil society organisations (CSOs) in the current hostile political situation and the backlash against women's rights. The development and implementation of the 2026-2030 Gender Equality Strategy is taking place in a rapidly changing world in which the challenges ahead require rapid, robust, ambitious measures and leadership in the fluctuating geo-political environment. In this context, the EU must be fit for purpose, guided by the 2026-2030 Gender Equality Strategy.

The EWL welcomes the Roadmap on Women's Rights that lays the foundation for transformational change and reflects several of the EWL's long-standing priorities. These include: tackling the continuum of all forms of violence against women in the EU; ensuring the highest standards of health; promoting equal pay and women's economic empowerment; advancing work-life balance and care policies; securing equal quality employment opportunities and adequate working conditions; supporting quality and inclusive education; fostering political participation and equal representation; and establishing concrete institutional mechanisms that deliver on women's rights. Women and girls in conflicts or in peace processes should also be protected and recognised as agents of change. The EWL's contribution is based upon these principles all of which are interdependent. Therefore, a holistic approach needs to be kept in mind in the implementation of the Gender Equality Strategy 2026-2030.

### The EWL urges the Commission to pursue a bold, coherent, and long-term vision, while resisting the pressures of deregulation.

In these immensely difficult and challenging times for all —and particularly for women who represent half of the population across Europe and globally—the EU and its Member States must demonstrate political leadership. It is their responsibility, in the face of growing populism and extremism to uphold the values of the EU and safeguard gender-sensitive responses to ensure that women, especially the most marginalised, do not bear the brunt of the ongoing backlash against fundamental rights and its long-term consequences.

While the Roadmap outlines eight important objectives and principles, it lacks concrete measures, which we expect this forthcoming Gender Equality Strategy to address.

The EWL also notes that **several key concerns for women are missing** from the Roadmap. These include but are not limited to:

<sup>&</sup>lt;sup>1</sup> <u>Communication</u> from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on A Roadmap for Women's Rights, 7 March 2025





- The EWL would also like to reiterate the EU's commitment towards the **Beijing Platform for Action<sup>2</sup>** and to women's rights and the freedom from male violence against women as a fundamental right in the EU.
- The increase in the use of **Artificial Intelligence** (AI) and its largely unknown impacts on women, which must be addressed.
- The EWL regrets the absence of specific protection for women in the cultural and artistic sectors—industries well known for gender-based inequalities, including limited labour opportunities and exposure to harassment, notably in the cinema and music industries. It is also important to recognise feminist culture and art as powerful political tools in times of upheaval.
- The EWL expects that the issue of women and poverty including the increase in homelessness among women, currently absent from the Roadmap, not only to be addressed in the EU Anti-Poverty Strategy<sup>3</sup> but to be interlinked with the Gender Equality Strategy post-2025. The EWL calls on the Commission to integrate a strong gender and intersectional lens across all anti-poverty measures.
- The EWL also supports the development of additional non-discrimination Strategies—such as the EU Anti-Racism Strategy, the EU LGBTIQ Equality Strategy for 2026-2030, the Strategy for the Right of Persons with Disabilities, the Review of the EU's Roma Equality and Inclusion Framework<sup>4</sup>, expected in 2025. The EWL calls on the European Commission to ensure the interconnection of the overall framework, so that all measures work effectively together and do not inadvertently harm or exclude any group living in the EU, including persons with disabilities. This is crucial for an intersectional approach.
- The EWL reiterates its call to the European Commission to **maintain** and push for the adoption of the so-called 'Horizontal Equal Treatment Directive<sup>5</sup>'.
- The EWL recognises that not all women have equal access to rights and resources, as their real life experiences are shaped by intersecting factors such as age, (dis)ability, sexual orientation, ethnicity, socio-economic factors, etc. Additionally, women living in rural, remote, or small island areas often face further barriers due to their geographical location. The EWL calls on the Commission to fully integrate this intersectional dimension into the new Strategy and, more broadly, across all its policies.
- The EWL calls for the systematic collection of sex-disaggregated data across all policy areas, including health, employment, poverty, trade, external actions and climate change. This data needs to be further disaggregated by other intersectional factors (e.g., age, disability, ethnicity) to reveal hidden inequalities.
- The EWL also calls on the Commission to work hand in hand with the European External Action Service (EEAS) to ensure policies on women in conflict areas, security and peace building are coherent and aligned.

In light of the public consultation and the drafting of the upcoming Gender Equality Strategy, the EWL proposes the following recommendations:

<sup>&</sup>lt;sup>5</sup> <u>Proposal</u> for a Council Directive on implementing the principle of equal treatment between persons irrespective of religion or belief, disability, age or sexual orientation {SEC(2008) 2180} {SEC(2008) 2181} /\* COM/2008/0426 final - CNS 2008/0140 \*/



<sup>&</sup>lt;sup>2</sup> Beijing Declaration and Platform for Action, September 1995

<sup>&</sup>lt;sup>3</sup> As part of the new Action Plan to implement the European Pillar of Social Rights, which aims to reduce poverty/social exclusion by 15million (compared to 2019) by 2030

<sup>&</sup>lt;sup>4</sup> Union of Equality: EU Roma strategic framework on equality, inclusion and participation



### 1. Violence against women as a continuum – Roadmap Principle

The EWL welcomes the commitment stated in the Roadmap by the European Commission to ensure women and girls are free from gender-based violence. In order to achieve this, the EWL proposes the following recommendations:

### 1.1 Ensure the ratification of the Istanbul Convention by all Member States

To achieve freedom from gender-based violence, the EWL recommends specific actions. First, the EWL stresses the crucial need for <u>all</u> Member States to ratify the Istanbul Convention<sup>6</sup> (IC) and condemns the five countries that have not done so to date (i.e.2025), despite the ratification at EU level. The EWL recommends the Commission to accompany the process for the ratification by all Member States, and to conduct an analysis of the situation in each country. To complement the role of GREVIO<sup>7</sup>, to ensure that women's organisations can contribute in a meaningful way, resources should be provided to women's civil society to draft a Shadow Report on the implementation of the IC and the monitoring thereof including at EU level.

# 1.2 Guide the transposition and implementation of the Directive on Combatting Violence against Women and Domestic Violence and revise it to improve the Directive post transposition

The EWL considers the adoption of the Directive on Combatting Violence against Women and Domestic Violence<sup>8</sup> (hereafter referred to as the Directive VAW) as a crucial step forward, and congratulates the European Commission and the European Parliament for their work. However, we believe the Directive VAW will only be a good tool if the implementation is done at the national level in a way that will make a true improvement in the lives of women and girls in the EU, regardless of where they live. Therefore, the EWL urges the Commission to commit to scrupulously monitor the transposition measures and support the process by providing technical assistance to Member States in collaboration with women's organisations.

Looking ahead to the planned post transposition period (2027) and its revision (article 45), the EWL calls on the Commission to address key gaps and strengthen the Directive VAW. In particular:

### **SCOPE OF THE DIRECTIVE VAW**

• While the Directive VAW is a step forward, its scope does not encompass all forms of violence against women and does not adequately protect women from all forms of gender-based violence. To ensure comprehensive protection and justice, it is essential that rape based on consent, sexual harassment, forced sterilisation, and femicide are explicitly defined and included in the revised Directive VAW. These are not isolated or marginal offences — they are crimes, widespread, systemic violations of women's fundamental rights, with devastating physical, psychological, and social consequences. Their exclusion sends a strong message of

<sup>&</sup>lt;sup>8</sup> <u>Directive</u> (EU) 2024/1385 of the European Parliament and of the Council of 14 May 2024 on combating violence against women and domestic violence



<sup>&</sup>lt;sup>6</sup> Council of Europe Convention on preventing and combating violence against women and domestic violence

<sup>&</sup>lt;sup>7</sup> GREVIO, <u>Istanbul Convention Action against violence against women and domestic violence</u>



**impunity** and undermines Directive VAW's goal of providing protection to all women and girls in Europe and to eradicating violence against women across the EU.

• We therefore urge the inclusion of violence against women as a Eurocrime as per Article 83.1 of the Treaty<sup>9</sup> on the Functioning of the European Union (TFEU), which is also supported by the European Parliament<sup>10</sup>.

Furthermore, in view of adopting an intersectional approach, we propose the following:

- To ensure the efficient revision of the Directive VAW and in view of adopting an intersectional approach, we recommend that the European Commission monitors its effects through the collection of qualitative, disaggregated data on the different groups of women affected by violence, for example, women with disabilities disaggregated by type of disability; women from racialised communities, including Roma, Sinti and Travellers, migrant origin and women living in rural areas and in remote islands. A coordinated Data Strategy on domestic, sexual and gender-based violence (DSGBV) should be developed across Member States. The strategy should support capacity-building at national level and be coordinated with EU, to underpin evidence-based policymaking and accountability.
- The Strategy should also integrate a 'disability lens' in anti-violence policies. Ensure training
  for professionals (police, healthcare, justice) on specific forms of violence and exploitation
  faced by women with disabilities and ensure accessible reporting mechanisms and support
  services.
- The Strategy should also give emphasis to migrants, refugees and asylum-seeking women. In particular, the EWL suggests developing EU-level guidelines for gender-sensitive asylum procedures to ensure proper identification of vulnerabilities, provide trauma-informed interviews and offer safe and dignified reception conditions.
- The Strategy should introduce a 'Gender Equality Scorecard' for Member States. This annual scorecard, based on common indicators (including those from the EIGE Gender Equality Index<sup>11</sup>), would assess progress, including regarding the effects of the Directive VAW, highlight areas for improvement, and encourage peer learning and accountability.
- Centre survivor engagement in EU responses to gender-based violence and invest in the
  development and implementation of structured and well-resourced survivor engagement
  mechanisms across Member States to ensure survivors' experiences meaningfully inform EU
  and national policy, legislation, and service delivery. Survivor-led input should be embedded

<sup>&</sup>lt;sup>11</sup> EIGE, Gender Equality <u>Index</u> 2024: Sustaining momentum on a fragile path, 10 December 2024 and upcoming annual indexes



<sup>&</sup>lt;sup>9</sup> Treaty on the Functioning of the European Union, TFUE

<sup>&</sup>lt;sup>10</sup> European Parliament, <u>Resolution</u> of 18 January 2024 on extending the list of EU crimes to hate speech and hate crime (2023/2068(INI))



in monitoring, evaluation, and reform of gender-based violence responses, in line with the Istanbul Convention<sup>12</sup> and the EU Victims' Rights Directive<sup>13</sup>.

- Deliver victim-survivor-centred justice reform, including review of procedural barriers and access to services, to safeguard women's privacy, safety, and access to support.
- The Strategy should also emphasise more clearly the need to address sexual violence systematically used as a weapon of war in times of war and armed conflicts.
- We wish to also highlight the issue of parental alienation<sup>14</sup> relating to children who witness domestic violence and, in cases of divorce, are held 'hostage' and call to further accentuate that 'aggravating circumstances' in these situations should be evoked to protect women and their children.

### **CYBER VIOLENCE AGAINST WOMEN (CVAW)**

- The treatment of cyber violence against women (CVAW) requires greater legal clarity within
  the Directive VAW. While the EWL acknowledges and welcomes the progress made at EU
  level to address cyber violence by including specific articles in the Directive VAW, it is urgent
  that further action is taken to ensure that women and girls are fully protected from all forms
  of online abuse.
- While two forms of VAW are recognised as Eurocrimes, namely female genital mutilation (FGM) and forced marriage—, the Directive VAW must also adequately protect women against the four forms of online violence, defined under computer crimes: (i) Non-consensual sharing of intimate and manipulated material, (ii) Cyber harassment, (iii) Cyber stalking, (iv) Cyber incitement to hatred or violence (articles 5, 6, 7, 8). It is absolutely crucial that the transposition of these articles go beyond 'minimum standards'. The transposition of the related articles must be based on the highest standards and the imperative to address online violence must outweigh free speech concerns.
- Considering the links between CVAW and rape, i.e. sex without freely given consent should be included in the text, as outlined above. References to the intentionality of the conducts and to 'serious harm' should be eliminated as they impose an onerous burden of proof on the victim. The production and dissemination of pornographic material depicting acts of sexual violence should be included in the review of the Directive VAW as it is a form of sexual exploitation. The scope of the crime should be extended to cover all forms of image based sexual digital forgeries, including pornography.
- The EWL recommends the Commission to initiate a process of cooperation with the Council
  of Europe to adopt an additional protocol to the Budapest Convention on Cybercrime<sup>15</sup>. This

<sup>&</sup>lt;sup>15</sup> Council of Europe, Convention on Cybercrime, 23 November 2001



<sup>&</sup>lt;sup>12</sup> Council of Europe <u>Convention</u> on preventing and combating violence against women and domestic violence

<sup>&</sup>lt;sup>13</sup> <u>Directive</u> 2012/29/EU of the European Parliament and of the Council of 25 October 2012 establishing minimum standards on the rights, support and protection of victims of crime, and replacing Council Framework Decision 2001/220/JHA

<sup>&</sup>lt;sup>14</sup> Parental alienation: manipulation of a child to develop a negative view and/or reject the other parent, often used as a form of control in situation of domestic violence



protocol aims at tackling all forms of cyber violence (online and offline) against women, including cyber sexism, online hate speech, and cyber misogyny, with specific focus on preventing and eliminating such violence against women who are active in or aspire to roles in the public sphere, such as politicians, women's rights activists, climate activists, and journalists.

- The Strategy should give a specific focus to the fight against hate speech and hate crime both online and offline. One way to do so would be to build on the Recommendations<sup>16</sup> of the Committee of Ministers of the Council of Europe on hate speech and hate crimes into EU law and policy. This should include the required translations, including easy-to-read versions into all official languages of the Union and the wide dissemination of these recommendations.
- The EWL calls on co-legislators to approach the **Victims' Rights Directive**<sup>17</sup> **negotiations** with the ambition to explicitly incorporate articles on cyber violence against women and its gendered nature.
- The EWL also calls on the Commission to ensure that while carrying out the transposition, National Authorities make the link with the **Digital Services Act**<sup>18</sup> (**DSA**), particularly regarding the responsibility of digital services to protect the fundamental rights of users; this includes large online platforms to ensure women's safety online.
- The EWL call on harmonised definitions and categories of CVAW at EU level and across EU institutions in order to address existing discrepancies across national legal systems that hamper effective protection and prosecution and impact negatively on data collection. To date, the only attempt to harmonise legal and statistical definitions<sup>19</sup> of CVAW has been carried out by the European Institute for Gender Equality (EIGE). EIGE's definitions should be adopted by all EU institutions.
- The EWL also advocates for the development of clear **guidelines** and **indicators** supporting Member States in their efforts to collect data on CVAW, as currently done by EIGE.

### **Artificial Intelligence and CVAW**

• In light of the proliferation of **sexual digital forgeries** (so-called **'deepfakes'**) and other forms of VAW through Artificial Intelligence (AI), the EWL urgently recommends that future updates of the AI Act<sup>20</sup> address CVAW through a comprehensive gender-sensitive approach. While the

Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828



<sup>&</sup>lt;sup>16</sup> CM/Rec (2022) 16 on Combatting Hate Speech, 20 May 2022

<sup>&</sup>lt;sup>17</sup> <u>Directive</u> 2012/29/EU of the European Parliament and of the Council of 25 October 2012 establishing minimum standards on the rights, support and protection of victims of crime, and replacing Council Framework Decision 2001/220/JHA

<sup>&</sup>lt;sup>18</sup> Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC

<sup>&</sup>lt;sup>19</sup> European Institute for Gender Equality, <u>Combating cyber violence against women and girls: Developing an EU measurement framework</u>



Al Act<sup>21</sup> does not explicitly focus on women's rights, its provisions have significant implications for women, both in terms of protection against Al-driven harms and the promotion of gender equality in Al development. In this context, the EWL supports the introduction of tools in the text that aim to prevent discrimination.

- However, the EWL calls for a better level of ambition and suggests that all AI systems have the
  highest protection against discrimination and gender equality biases. As a first step, the EWL
  proposes that a mandatory fundamental rights impact assessment (Article 27) to all AI
  systems.
- To understand the impact of the AI Act<sup>22</sup> on gender equality, we call on the European Commission in the upcoming Gender Equality Strategy to carry out a gender equality impact assessment of the AI Act<sup>23</sup> and subsequently propose revisions.

### 1.3 Ban prostitution and adopt the Equality model

- As prostitution is a form of violence, exploitation of inequality, and a violation of human dignity and human rights, particularly against women and girls, the EWL calls for its abolition. Specifically, we call on the Commission, in the next Gender Equality Strategy, to move towards (i) the suppression of repressive measures against prostituted persons, primarily women and girls; (ii) the criminalisation of all forms of procuring; (iii) the development of real alternatives and funding for exit programmes for those in prostitution; (vi) the prohibition of the purchase of a sexual acts; (v) the implementation of policies of prevention and education, to promote equality and positive sexuality; (vi) the development of prevention policies in the countries of origin.
- The EWL recommends the Commission to adopt an abolitionist perspective, based on the Equality Model (also known as the 'Nordic Model'). Calls to build on the Resolution of the European Parliament<sup>24</sup>, decriminalising persons in prostitution while criminalising the so-called 'sex-buyers' and exploitive third parties. This model has already been adopted by several Member States (e.g., France, Sweden and Ireland) is efficient in reducing demand and cases of human trafficking, as traffickers can more easily hide their criminal activities in countries where prostitution is fully legalised.
- The EWL recommends the Strategy to ensure that efforts to combat human trafficking and exploitation of migrant women are strengthened. It must enhance cross-border cooperation, provide specialised victim support, and ensure safe reporting channels.
- The Strategy should **prioritise exit supports for women in prostitution**—across healthcare, housing, legal and migration support, social protection, and employment.

<sup>22</sup> Ibid.

<sup>&</sup>lt;sup>21</sup> Ibid.

<sup>&</sup>lt;sup>23</sup> Ibid.

<sup>&</sup>lt;sup>24</sup> European Parliament <u>resolution</u> of 14 September 2023 on the regulation of prostitution in the EU: its cross-border implications and impact on gender equality and women's rights (2022/2139(INI))



### 1.4 EU pillar of social rights

• The EWL calls on the Commission to include services for violence against women as an essential service under Principle 20 of the EU Pillar of Social Rights<sup>25</sup>. Furthermore, the European Commission should prioritise the gender-sensitive implementation of the European Pillar of Social Rights<sup>26</sup>. In particular, the EWL calls on the Commission to present an ambitious new Action Plan that integrates a gender perspective throughout and includes concrete targets and indicators for every principle.

<sup>&</sup>lt;sup>25</sup> <u>Communication</u> from the Commission to the European parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the European Pillar of Social Eights Action Plan <sup>26</sup> *Ibid*.





# 2. Ensuring the highest standards of health – Roadmap principle 2

The EWL supports the Roadmap's commitment to achieve the highest standards of health for women, and strongly welcomes the reference to **sexual and reproductive health and rights (SRHR)**, and medical research processes that are gender-sensitive. However, the lack of concrete actions in the Roadmap should be acknowledged and addressed in the upcoming Strategy. We propose the following recommendations:

### 2.1 Access to safe and legal abortion

- EWL reiterates its call to make safe abortion legal and accessible to all women and girls in Europe and worldwide<sup>27</sup>. In the EU and as in different parts of the world, many obstacles have been hindering women's access to abortion services, ranging from the conscientious objection used by medical practitioners, information and accessibility to the lack of reimbursement of the needed drugs or operation(s). Women's access to safe abortion is a matter of life or death. The lack of proximity to medical centres or the impossibility to access them (physical accessibility, and accessibility of information and communication, such as lack of information in Easy-to-Read, International Sign language for women with disabilities) have also been significant hurdles as revealed during the pandemic. On top of these barriers, women continue to be stigmatised when they carry out an abortion.
- The EWL calls on the next Gender Equality Strategy to include specific policy actions to improve access to abortion, including Commission guidelines on abortion care to member states in line with World Health Organisation (WHO) standards<sup>28</sup>, sharing of good practices in the provision of abortion care among member states, and monitoring and analysis of gaps and guidance on data collection.
- The EWL calls for the right to abortion to be included in the EU Charter of fundamental rights<sup>29</sup> and calls on the European Commission to implement the recommendations of the European Parliament in Resolution P9\_TA(2024)0286<sup>30</sup>. However we are mindful of the fact that opening the EU Charter and Treaties would carry risks at this stage in light of the backlash on women's rights, therefore we support in the first instance a positive follow up to the petition 'My Voice, My Choice' to enable women to have access to abortion in EU countries with the support of EU funding.

<sup>&</sup>lt;sup>30</sup> European Parliament <u>resolution</u> of 11 April 2024 on including the right to abortion in the EU Fundamental Rights Charter



<sup>&</sup>lt;sup>27</sup> EWL Emergency Motion, Protecting and Advancing of Abortion Rights, June 2025

<sup>&</sup>lt;sup>28</sup> World Health Organistion (WHO), <u>Abortion care guideline</u>

<sup>&</sup>lt;sup>29</sup> Charter of Fundamental Rights of the European Union



- The Commission must develop legislative initiatives to strengthen access to abortion medication, including the revision of the pharmaceutical package, including the EU Medicines Directive<sup>31</sup> and the Critical Medicines Act<sup>32</sup> and the update of the Critical Medicines list.
- The EWL also supports financial commitments in the next Multiannual Financial Framework
  for women's health including SRHR under the EU4health<sup>33</sup> programme, and for CSOs working
  on SRHR including abortion. The EWL advocates for full or partial government coverage of
  treatments related to abortion proceedings, as current costs are prohibitive for certain
  women.
- The EWL calls for continued and strengthened EU commitments and actions to advance SRHR globally as part of the **EU's (feminist) foreign policy.**
- The EWL call on the EU Institutions to reject regression on abortion and respond strongly to threats seeking to roll back abortion rights or to undermine and threaten the operations of human rights defenders and NGOs.

### 2.2 Call for a Lifecycle approach to Women's Health

- The EWL recommends that the Commission, when developing a health-related framework and proposing concrete measures, adopts an approach that encompasses the entire lifecycle of women (childhood, adolescence, mid-life and older women). Historically, medical research and clinical trials have predominantly focused on male physiology, leading to gaps in understanding women's specific health needs at different stages of their lives and responses to treatments. Health issues are different and vary depending of the age of women, and their period of life. This includes addressing a wide range of medical issues, including (but not only) menopause, obstetric care and violence, pregnancy and postpartum care, women-specific illnesses such as endometriosis, menstrual health, including avoiding forced contraception and forced medication for purposes of menstrual control, and ensuring access to information and supported decision-making for persons with disabilities, and access to contraception.
- The EWL recommends the development of sex- disaggregated and intersectional health data systems across Member States.
- **Prevention measures** for specific illnesses such as cancers and cardio vascular diseases should be included in the Strategy.

<sup>&</sup>lt;sup>33</sup> Regulation (EU) 2021/522 of the European Parliament and of the Council of 24 March 2021 establishing a Programme for the Union's action in the field of health ('EU4Health Programme') for the period 2021-2027, and repealing Regulation (EU) No 282/2014



<sup>&</sup>lt;sup>31</sup> <u>Directive</u> 2001/83/EC of the European Parliament and of the Council of 6 November 2001 on the Community code relating to medicinal products for human use

<sup>&</sup>lt;sup>32</sup> <u>Proposal</u> for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL laying a framework for strengthening the availability and security of supply of critical medicinal products as well as the availability of, and accessibility of, medicinal products of common interest, and amending Regulation (EU) 2024/795



- The Strategy should mandate the systematic integration of sex and gender analysis in all EUfunded health research programmes. This means explicitly requiring researchers to consider biological sex differences and socio-cultural gender roles in study design, data collection, analysis, and interpretation of results.
- The Strategy should commit to address health disparities faced by marginalised women (e.g., Roma women, migrant women, women with disabilities, LGBTIQ+ women) due to systemic discrimination, poverty, and lack of accessible services. This could include targeted health programmes or outreach initiatives. Specific attention should be given to ageing and older women and address issues pertinent to their conditions (e.g., osteoporosis, cardiovascular disease, healthcare...). A minimum proportion of national health budgets (10%) should be allocated to delivering universal, inclusive healthcare underpinned by gender and equality principles.
- The new Strategy should include policies for free or subsidised access to menstrual and hygiene products, especially for women living in poverty, homelessness and women with disabilities, recognising them as essential healthcare needs and a matter of dignity and inclusion.
- The Strategy should also provide legal tools to ensure universal access to essential services
  (healthcare, legal aid, psychosocial support) for all migrant, refugee, and asylum-seeking
  women, regardless of their legal status.
- The Strategy should ensure equitable access to innovative health technologies and quality treatments for all women and girls, regardless of socioeconomic status or geographic location.
- The Strategy should promote the development and delivery of high-quality, women-centred maternity services across Member States, grounded in human rights, clinical excellence, and community-based supports. The EU should encourage the co-design of national maternity strategies with civil society and women's organisations to ensure services are inclusive, culturally competent, and responsive to women's diverse needs and choices throughout pregnancy, birth, and postpartum care. Investment in modern, publicly accountable maternity infrastructure and care pathways should be supported as a matter of gender equality and health equality.
- The EU should promote cross-country learning and monitoring mechanisms to uphold women's right to health in all its diversity.

### 2.3 Ensure an explicit and gender-specific focus to mental health

As women disproportionately experience certain mental health conditions (e.g., depression, anxiety) due to various factors including societal pressures, gender-based violence, caregiving burdens and economic precarity, the EWL calls on the Strategy to include specific objectives and actions to:

 Support and invest in the gender-sensitive implementation of national mental health policies across Member States, ensuring that mental health systems are reformed to address



the specific needs, risks, and lived experiences of women and girls. EU action should promote the integration of gender and intersectionality in mental health strategies—recognising how gender-based violence, discrimination, caring responsibilities, and socio-economic inequalities impact women's mental health—and encourage the development of inclusive, trauma-informed, and community-based services that improve access and outcomes for all.

- Promote gender-sensitive mental health services that address the unique stressors and expressions of mental illnesses for women at all stages of their life (childhood, adolescence, mid-life, older women), based on the 'do no harm' principle and including trauma-informed care for survivors of violence.
- Increase research and data collection on gender differences in mental health conditions, access to care and treatment outcomes.
- Recognise and address the mental health impact of caregiving responsibilities on women, including burnout and stress for both formal and informal carers.
- Integrate mental health support into wider health and social services, with a focus on early intervention and prevention.
- Fund EU-wide awareness campaigns about mental health, treatments and support.

### 2.4 Gender equality within the healthcare workforce

Despite the fact that the healthcare sector is predominantly female, women are often concentrated in lower paid, lower-status roles and underrepresented in leadership. The EWL calls on the Commission to ensure in the upcoming Strategy to:

- Promote gender parity in leadership and decision-making roles within national and EU health institutions.
- Address **gender pay and pension gaps** within the healthcare workforce.
- Ensure **gender-sensitive training and education** for all healthcare professionals to provide non-discriminatory and respectful care.
- Combat harassment and violence within the healthcare workplace, protecting predominantly female workers.

By adding these concrete measures, particularly focusing on mental health, comprehensive research, intersectional health disparities, and internal gender equality within the healthcare sector, the health pillar of the strategy would be significantly strengthened.



## 3. A Feminist Economic Framework – Roadmap principles 3, 4, & 5

The EWL has developed its own vision, called 'Purple Pact – for a Feminist economic model<sup>34</sup>' which includes recommendations for a transformative shift towards a feminist economy. The feminist approach to the economy embodied in the EWL's **Purple Pact** takes as a starting point the full participation of women in <u>all</u> areas of life and equal representation of women in all their diversity at all levels of decision-making and leadership, including economic decision-making. It is a fundamental pillar of democratic, universal, inalienable and indivisible human rights to build an inclusive economy for the well-being of all. The focus is a universal social care system with an infrastructure that can provide quality social and care services for all, which are accessible and affordable. It also stresses the fact that environmental issues have always been, and are increasingly, also a matter of human rights and social justice and are thus feminist issues and an integral part of a feminist economic model.

As a premise, to achieving a feminist economic framework, the EWL calls on the Commission to conduct gender impact assessments of the EU's macroeconomic framework, including in the European Semester process to integrate data and statistics from the EIGE Gender Equality Index<sup>35</sup> and adopt a feminist economics approach to guide more inclusive and equal outcomes.

Persistently, data on macro-economics fail to integrate a gender perspective. As recent as June 2025, the latest Joint Employment Report  $2025^{36}$  has very scant references to women throughout and in particular in the chapter *Promoting Equal Opportunities for all, fostering social inclusion and fighting poverty* (p. 86 – 101). While the report acknowledges the higher at-risk-of-poverty rates (AROP) among women with disabilities compared to men in the same situation (29.8% and 27.6% respectively), the use throughout the report of gender neutral terms, such as 'household income', 'parents' 'persons', 'old age/pensions' etc. make women's poverty and social exclusion absolutely invisible. This is not acceptable.

• The EWL calls for the revision of the standard male-breadwinner model, consistently used in statistics, data, policies and to replace this obsolete concept by one that encompasses a realistic approach to achieving equality between women and men. In this context, the EWL proposes to adopt the equal-earner-equal-carer model. Ample evidence shows that women's over representation in caring responsibilities not only limits their access to paid work but carries life-long consequences particularly as they age as they have limited pension rights due to the fact that they spend more time in unpaid care. An equal-earner-equal-carer model recognises men's (and women's) right to take time out of the labour market at different stages of their lives. In this model, care credits for pension rights, i.e. recognition of periods out of the labour-market for caring responsibilities are accounted for in pension calculation (number of years requirements) should be established for both women and men, particularly in current policies that aim to reform pension systems (e.g., through the Economic Governance Framework, the European Semester).

<sup>&</sup>lt;sup>36</sup> European Commission, Joint Employment report 2025, as adopted by the Council on 10 May 2025



<sup>&</sup>lt;sup>34</sup> See the European Women's Lobby 'Purple Pact: A feminist approach to the economy', 2019 <a href="https://www.womenlobby.org/IMG/pdf/purplepact-publication-web.pdf">https://www.womenlobby.org/IMG/pdf/purplepact-publication-web.pdf</a>

<sup>&</sup>lt;sup>35</sup> EIGE, Gender Equality <u>Index</u> 2024: Sustaining momentum on a fragile path, 10 December 2024 and upcoming annual indexes



 The Commission should also systematically use the country-specific recommendations (European Semester) to highlight gendered impacts of policies and reinforce commitments to gender equality in National Reform Programmes (NRPs), including in macroeconomic policies. This is particularly urgent given that NATO members (of which 23 are EU Member States) have agreed to spend 5% of their GDP on defence and security by 2035.

### **WOMEN AND CLIMATE**

A feminist economic model also encompasses a feminist approach to climate/environmental policies. In this context, the EWL urges the Commission to take into account the dual gender-related impacts of climate change and environmental policies. Evidence shows that women can play a crucial role in addressing climate change—particularly when they hold leadership positions, such as in corporate sustainability reporting. At the same time, women are often among the first and most severely affected by the consequences of climate change, as well as through climate change adaptation policies. In light of this, the EWL recommends that the Strategy should:

- Mandate gender impact assessments for all new EU climate and environmental policies and funding programs: Ensure that green transition initiatives do not exacerbate existing gender inequalities and identify opportunities for positive impacts.
- Integrate gender mainstreaming into climate change adaptation policies.
- Allocate dedicated funding within EU climate and energy programmes to support women's leadership and participation in the green economy: This includes training for green jobs, entrepreneurship support, and positions in decision-making bodies related to climate policy.
- Ensure all EU and national climate policies are gender-responsive, equality-driven, and poverty-proofed, including through the Just Transition framework<sup>37</sup>, so that the European Green Deal<sup>38</sup> actively reduces—rather than reinforces—existing gender inequalities across Member States.
- Develop guidelines for Member States on incorporating a gender perspective into National Energy and Climate Plans (NECPs): Focus on energy poverty experienced disproportionately by women and promote women's roles in local energy communities.

### 3.1 Equal pay and economic empowerment

• The EWL has, since the beginning, called for the effective implementation of the principle that every woman has the right to equal pay for equal work or work of equal value and to be economically independent. Closing employment gender gaps is an ethical necessity but also, as highlighted by the 2024 EIGE Index on Gender Equality, a pivotal step to the economic prosperity of the EU. In that spirit, the EWL welcomes the adoption of the Pay Transparency

<sup>&</sup>lt;sup>38</sup> Communication from the Commission, The European Green Deal, 11 December 2019



<sup>&</sup>lt;sup>37</sup> See European Commission's website: <a href="https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/finance-and-green-deal/just-transition-mechanism">https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/finance-and-green-deal/just-transition-mechanism</a> en



**Directive**<sup>39</sup> and calls on the Commission to monitor and coordinate the good implementation of the Directive<sup>40</sup> by Member States. Once the transposition period has passed, the Commission should carefully assess the effects of the Directive<sup>41</sup>.

- While the adoption the Pay Transparency Directive<sup>42</sup> to ensure equal pay is a good step forward, the EWL proposes that the EU provides help to women that in the meantime (whilst awaiting the transposition of the Directive) are experiencing, economic loss, discrimination and/or violence. The protection of women and girls at risk of social exclusion, poverty and homelessness, women and girls with disabilities, is strikingly absent in the Roadmap. EWL calls on the Commission to ensure these aspects are addressed in the next Gender Equality Strategy and that a gender dimension is included in the next Anti-Poverty Strategy.
- The Commission should also further facilitate and encourage national policy and sectoral social dialogue measures for more equal career progressions, transparent recruitment practices and against algorithmic discrimination in hiring procedures.
- The EWL wishes to highlight that economic empowerment also requires a holistic approach toward financial empowerment, i.e. access to assets, capital and savings to ensure that women have empowerment of and control over all aspects of financial matters. In this context, the EWL calls for gender impact assessments of the EU financial and capital policies, such as all policies covered under the <a href="Savings and Investment Union">Savings and Investment Union</a> (capital markets, banking, insurance and pension funds, etc.). The EWL also calls for campaigns on financial literacy from a gender equality perspective.
- According to the EIGE Gender Equality Index, in 2022, around 17 % of women and 15 % of men in the EU were at risk of poverty. The Index also shows that the gender poverty gap is most pronounced between older women and men, and between older women with disabilities, with 20 % of women and 14 % of men aged 65 and over at risk of poverty. The gender pension gap, which is the result of an accumulation of inequalities throughout women's lifecycle, mirroring the effects of the 'male-breadwinner-model', accounts in the EU for 26<sup>43</sup>%.
- Although women's increasing labour market participation and thus potential increased pension income will reduce this gap in the future. However, it will not be fully bridged unless the persistent inequalities in paid and unpaid work are addressed and unless the genderbiased pension systems are made more gender equal and recognise care credits for both women and men as an integral part an 'equal-earner-equal-carer' model.
- The direction of the current pension reforms (longer working life, stronger link between contributions and benefits, shift from first pillar to second and third pillar) risks aggravating the gender inequalities inherent in current pension systems. Addressing the gender disparities

<sup>&</sup>lt;sup>39</sup> <u>Directive</u> (EU) 2023/970 of the European Parliament and of the Council of 10 May 2023 to strengthen the application of the principle of equal pay for equal work or work of equal value between men and women through pay transparency and enforcement mechanisms

<sup>&</sup>lt;sup>40</sup> Ibid.

<sup>&</sup>lt;sup>41</sup> Ibid.

<sup>&</sup>lt;sup>42</sup> Ibid.

<sup>&</sup>lt;sup>43</sup> EIGE, Gender Equality Index 2024: Sustaining momentum on a fragile path, 10 December 2024, p.23



in pensions requires a comprehensive analysis of women's lifecycle both in terms of women's different working patterns and pay and time spent out of the labour market, usually for the care of children, dependent and elderly family members. A coherent approach to gender sensitive pension policies and systems and strong leadership of the European Commission is urgently needed. From a holistic approach, measures are required to improve pension systems as they mirror life-long inequalities. The EWL recommends:

- Take measures to ensure the Member States strengthen the first pillar rather than shift to the 2<sup>nd</sup> and 3<sup>rd</sup> pillar. This is where equality between women and men with regards to pension rights can be strengthened.
- Introduce universal, state-funded pension systems that are benchmarked to average earnings to ensure an adequate standard of living for all older people, particularly women who are disproportionately affected by pension gaps due to unpaid care, parttime work, and lower lifetime earnings.
- Develop European standards on care crediting. The credits should be provided for caring for children and for elderly/dependents. They should allow parallel employment and not encourage women to become full-time care givers. Crediting systems should support equal sharing of care responsibilities between parents. The level of crediting should ensure full pension coverage. The Commission should reflect on how care time can be compensated in funded second and third pillar schemes.
- Make other recommendations on how Member States should make their pension systems more gender equal particularly in the context of country-specificrecommendations in the European Semester process (e.g. individualisation of pension rights).
- Benchmark social protection payments and supports against a Minimum Essential Standard of Living (MESL) that reflects the real cost of living.
- Member States to set targets for reducing the at-risk-of poverty of elderly women and monitor their attainment;
- Member States to set care targets for care for elderly and dependent family members and monitor the implementation (follow-up the European Care Strategy<sup>44</sup>);
- Assess the Directives on part-time work<sup>45</sup> and fixed-terms contracts<sup>46</sup> from a gender equality perspective and assess specifically the impact of part-time work on women's pension income;

<sup>&</sup>lt;sup>46</sup> Council <u>Directive</u> 1999/70/EC of 28 June 1999 concerning the framework agreement on fixed-term work concluded by ETUC, UNICE and CEEP



<sup>&</sup>lt;sup>44</sup> <u>Communication</u> from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the European Care Strategy

<sup>&</sup>lt;sup>45</sup> Council <u>Directive</u> 97/81/EC of 15 December 1997 concerning the Framework Agreement on part-time work concluded by UNICE, CEEP and the ETUC - Annex: Framework agreement on part-time work



- Carry out a comparative study on gender aspects implied in 2<sup>nd</sup> and 3<sup>rd</sup> pillar pension schemes. It will only be possible to develop measures to ensure gender equality in these schemes once the problems are identified.
- Continue to monitor the application of the European Court of Justice ruling<sup>47</sup> on the Test-Achat case to funded pension schemes.

#### 3.2 Work-life balance and care

The EWL welcomes the Roadmap's commitment to upholding and advancing the principle that every woman has the right to balance her professional and private life. It also considers the adoption of the **Work-Life Balance Directive**<sup>48</sup> a cornerstone of this principle and considers it as a good step in the right direction to bring about a cultural shift to ensure that men too can enjoy their share of care. However, the **EWL remains convinced that the EU must go further**, as the current situation for women across the EU remains far from ideal. The gender care gap underpins inequalities in employment, working conditions, earnings and overall, gender relations and deep-seated stereotypes. Women spending much more time on care and domestic work not only limits their opportunities in paid employment, but also creates enormous work-life strains. Achieving gender equality requires a holistic approach both in the labour-market and at home. Therefore:

- The EWL calls on the Commission to acknowledge the central value of care, including its economic value. The EWL calls on the Commission to move beyond the current European Care Strategy and introduce a Care Deal for Europe in the Gender Equality Strategy. Similar to the 'Green Deal' for the protection of the environment and a green clean economy, we believe that synergies can be made between the two: one the one hand 'Caring for the planet(Green Deal): caring for each other(Care Deal)'. Both are the premises for a sustainable macro-socio-economic model for the benefit of all both in the present and for future generations.
- Carry out an **EU study** of the effective impact on men's take-up leave in the context of the **Work-Life-Balance Directive**<sup>49</sup>.
- The EWL urges the European Commission to revise the Maternity Directive<sup>50</sup> with the aim of closing the gaps in paid maternity leave provisions for all women across the EU. The revision of this Directive<sup>51</sup> can be addressed within the framework of free movement of workers<sup>52</sup> to

<sup>&</sup>lt;sup>47</sup> <u>Judgment</u> of the Court (Grand Chamber) of 1 March 2011, Association Belge des Consommateurs Test-Achats ASBL and Others v Conseil des ministres.

<sup>&</sup>lt;sup>48</sup> <u>Directive</u> (EU) 2019/1158 of the European Parliament and of the Council of 20 June 2019 on work-life balance for parents and carers and repealing Council Directive 2010/18/EU
<sup>49</sup> *Ibid*.

<sup>&</sup>lt;sup>50</sup> Council <u>Directive</u> 92/85/EEC of 19 October 1992 on the introduction of measures to encourage improvements in the safety and health at work of pregnant workers and workers who have recently given birth or are breastfeeding (tenth individual Directive within the meaning of Article 16 (1) of Directive 89/391/EEC)

<sup>&</sup>lt;sup>51</sup> Council <u>Directive</u> 92/85/EEC of 19 October 1992 on the introduction of measures to encourage improvements in the safety and health at work of pregnant workers and workers who have recently given birth or are breastfeeding (tenth individual Directive within the meaning of Article 16 (1) of Directive 89/391/EEC)

<sup>&</sup>lt;sup>52</sup> Article 3(2) of the Treaty on European Union (<u>TEU</u>); Articles 4(2)(a), 20, 26 and 45-48 of the Treaty on the Functioning of the European Union (<u>TFEU</u>))



guarantee equal rights for all women regardless of the Member State where they live, work and give birth.

• The EWL calls on the EU's accession to the International Labour Organisation (ILO) Domestic Workers Convention<sup>53</sup> to uphold labour rights in the care sector, particularly with regards to the rights of migrant women.

### 3.3 Equal employment opportunities and adequate working conditions

The EWL believes that to ensure equal employment opportunities and adequate working conditions, progress is still very much needed in the EU. This particular objective requires concrete changes and measures that the Commission can initiate on several levels.

- The EWL calls on the Commission and the Member States to establish quotas in sectors that are underrepresented in education and employment, including those characterised by gender segregation, such as Science, Technology, Engineering, Arts and Mathematics (STEAM), cybersecurity, and care. Special attention should also be given to workers in large digital platforms. Specifically, the EWL calls on the European Commission to carry out gender equality impact assessments of the Platform Work Directive<sup>54</sup> in the upcoming Gender Equality Strategy.
- The Commission should actively seek to **improve women's engagement in the ICT sector**, and the inclusion of women in the digital skills agenda<sup>55</sup> and introduce specific quota, building on the Women on Boards Directive<sup>56</sup>.
- The EWL also urges the Commission to provide specific protection measures for women working in artistic and cultural spheres, which are well known for gender-based inequalities, including limited labour opportunities and exposure to harassment. Notably, the Strategy should:
  - Develop an EU Charter for Gender Equality in the Cultural and Creative Sectors: This
    charter would outline principles and best practices for addressing gender-based
    inequalities, including equal pay, representation, and combating harassment.
  - Support mentorship and networking programs for women in cultural leadership roles: Address the 'glass ceiling' in cultural institutions and industries.
  - Fund research and data collection on gender inequalities in specific cultural subsectors: Identify pay gaps, underrepresentation, and prevalence of harassment (e.g., in film production, music industry, visual arts).
  - Promote the inclusion of gender equality criteria in EU cultural funding programs: Encourage projects that feature women's voices, stories, and leadership.

<sup>&</sup>lt;sup>56</sup> <u>Directive</u> (EU) 2022/2381 of the European Parliament and of the Council of 23 November 2022 on improving the gender balance among directors of listed companies and related measures



<sup>&</sup>lt;sup>53</sup> ILO, C189 - Domestic Workers <u>Convention</u>, 2011 (No. 189)

<sup>&</sup>lt;sup>54</sup> <u>Directive (EU) 2024/2831 of the European Parliament and of the Council of 23 October 2024 on improving working conditions in platform work</u>

<sup>&</sup>lt;sup>55</sup> <u>Communication</u> from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on a European Skills Agenda for sustainable competitiveness, social fairness and resilience



- In terms of **entrepreneurship**, the EWL calls on the Commission to ensure gender mainstreaming is applied to social action plans and that women entrepreneurs have access to social supports and to finance.
- The EWL also calls on the Commission to carry out gender impact assessments of the **Public Procurement Directive**<sup>57</sup>. On the basis of the outcomes of the impact assessments, the EWL calls for the revision of the Directive<sup>58</sup>, to ensure that gender mainstreaming is a conditionality of all public procurement policies and rewards. Companies that do not guarantee equal pay, decent working conditions and access to rights for all should not be eligible.
- The EWL calls on the Commission to urgently address gender-based violence and harassment in the workplace. Sexist and gender-based violence and harassment at work regardless of where the work is performed must be recognised as human rights violations and threats to equality. The ILO-Gallup's global survey<sup>59</sup> shows that over 22% of workers have experienced workplace violence or harassment in 2021, with women disproportionately affected, especially sexually and psychologically. Implementing the ILO Convention 190 is essential to ending sexist stereotypes, protecting employee's dignity and mental health, and breaking the silence around abuse. It also supports equal pay and boots productivity. Additionally, specific focus should be given to ageing women and specific violence and agerelated discrimination they can suffer from in the workplace.
- The EWL also suggests that generally, the Commission should seek to further support and strengthen the role of trade unions and social partners in providing safe workplaces and advocating for victims of violence at work, including via an enhanced cooperation with national equality bodies.
- The EWL also calls for access to reasonable accommodation for all women and girls with disabilities, to ensure full and effective participation in open labour market and in the community.

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 $<sup>^{57}</sup>$  <u>Directive</u> 2014/24/EU of the European Parliament and of the Council of 26 February 2014 on public procurement and repealing Directive 2004/18/EC

<sup>58</sup> Ibid.

<sup>&</sup>lt;sup>59</sup> International Labour Organisation, Gallup, Experiences of violence and harassment at work: A global first survey



### 4. Quality and inclusive education – Roadmap principle 6

The EWL supports the Roadmap's commitment to ensure that every girl and woman has the right to high quality and inclusive education and training, free from discrimination.

Achieving gender equality is a societal issue, which involves all its actors. However, gender equality is often perceived to be a women's issue only, which excludes **men and boy's** perception of and effective involvement in achieving gender equality for the wellbeing of all. The EWL advocates for men to be actors in the systemic change that needs to happen in terms of gender equality. **Gender equality strategies should include involving men in preventing gender-based violence, promoting equal sharing of care responsibilities, and challenging toxic masculinities.** 

Patriarchy continues to shape <u>women and girls along with men and boys</u> real-life experiences, access to resources and prospects to shape the world we live in. Men's over-representation as perpetrators of all forms of violence against women, coupled with entrenched gender stereotypes, gender segregated labour-markets, higher levels of pay, greater value given to the sectors where men work (finance, 'heavy' industry, ICT, etc.) and the male bread-winner model that defines access to social rights, particularly pensions, all lead in the direction of a 'man's world'. However, changing work and life patterns no longer guarantee current younger generations of men to fit into the outdated male bread-winner model. All of these issues need to be addressed, in the framework of quality and inclusive education particularly in the early stages of life.

In light of these trends and societal realities, the EWL makes the following recommendations:

- Expand **educational** curriculum for <u>both</u> girls and boys to include **S**cience, **T**echnology, **E**ngineering, **A**rts and **M**athematics (**STEAM**)<sup>60</sup>. This would have a positive impact on girls and boys choices, enabling girls to pursue scientific education and careers and boys to pursue education in so-called 'soft skills' and careers in care. This would also have a positive impact on breaking gender stereotypes.
- Integrate sexuality education in educational systems, which would focus on positive masculinities, healthy relationships, in mutual respect and dignity and delivered by qualified and specially trained professionals. Comprehensive sexuality education equips young people, both girls and boys with essential knowledge about their bodies, relationships, consent, gender equality, and health. It fosters respect for oneself and others, challenges harmful stereotypes, including stereotypes against women and girls with disabilities, and helps in preventing all forms of gender-based violence, including online, discrimination, and abuse. The EWL has developed a report and subsequent training module on Sexuality Education: Ensuring safe, uncoerced, egalitarian and mutually pleasurable sex and relationships for the next generation<sup>61</sup>, which contains 15 feminist principles.
- The new Strategy must address the issue of abusive and degrading pornography targeting women as a contributing factor to the rise of teen violence and abuse. While the Directive

<sup>&</sup>lt;sup>61</sup> European Women's Lobby, Feminist SEXuality Education



<sup>&</sup>lt;sup>60</sup> STEM vs. STEAM - What's the difference?



VAW promotes stricter age verification for people under 18, it does not sufficiently tackle the harmful nature of the content itself.

- Combat toxic masculinities: Educate boys and men that women's bodies are not for sale; prostitution and pornography are damaging for women and girls. The Strategy should develop and promote educational resources for schools and youth organisations on healthy masculinities and respectful relationships. These programmes should be integrated into curricula across all Member States.
- Call on the tech sector and the so-called 'on-line big platforms' to take their responsibility and
  on the European Commission to regulate harmful content in the context of its role to monitor
  these platforms under the DSA<sup>62</sup>.
- Carry out and fund EU-wide public campaigns on positive male role models, with known
  personalities, such as social media influencers or sport personalities that actively engage men
  and boys in gender equality. The focus should be on themes like shared care responsibilities,
  combating gender-based violence (e.g., 'White Ribbon' campaigns), and challenging harmful
  and toxic masculinities.
- The EWL calls on the Commission to ensure that national strategies to combat gender-based violence include specific measures targeting male behaviour and accountability. While resources should be made available however, it is crucial that funding must not be to the detriment of women's organisations.
- The Commission should **work with Member States** to allow them to share best practises and tools, organise joint trainings and educational sessions and facilitate collaboration. CSOs, including feminist and women's organisations can play a crucial role in facilitating this.
- In particular, the new Strategy should **support initiatives for inclusive education and employment for women of all groups of women**, for example women with disabilities, racialised women, etc. This includes vocational training, mentorship programmes, and quotas in relevant sectors where underrepresentation is identified.

<sup>&</sup>lt;sup>62</sup> Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC





# 5. Political participation and equal representation – Roadmap principle 7

- The EWL advocates for equal participation and representation of women's in all areas of society. Therefore, it strongly supports the commitment seen in the Roadmap towards women's safe participation in public life.
- As a starting point, we call on the Commission to strongly monitor the targets set by the Women on Boards Directive<sup>63</sup> that companies need to achieve by 30 June 2026. Dedicated resources must be put in place for that achievement.
- The EWL believes that fair and equal representation must be ensured across all institutional, parliamentary, and government structures, as women remain significantly underrepresented. Tools such as appropriately designed quotas have proven to be the most effective tool for "fast-tracking" women's representation in elected bodies of government. In 11 Member States<sup>64</sup>, binding legislated candidate quotas exist for the EU elections (*Belgium, Greece, Spain, France, Croatia, Italy, Luxembourg, Poland, Portugal, Romania, and Slovenia*). Mandatory quotas are a necessary and temporary tool to address an imbalance created by structural causes, gender biases electoral systems and a deeply unequal division of power between men and women. Parity democracy must be the outcome.
- As decisions made at European level impact the daily life of women and men throughout Europe, gender equality must be at the core of European policy-making. Women need to be equally represented when such decisions are made. In that vein, the EWL calls on the Commission to fully play its facilitator's role in the institutional talks between the European Parliament and the Council on the reform of the European Electoral Law<sup>65</sup>, which is stalled in the Council. Specifically, the EWL recommends to:
  - Make gender equality a horizontal principle of the European elections and a minimal democratic standard;
  - Establish gender mainstreaming in all the activities of the European Union;
  - Call for mandatory gender balance on candidate lists;
  - Foster parity and call for the adoption of concrete measures to ensure candidate lists
     have an equal number of male and female candidates, such as the use of zipped lists;
  - Ensure a gender-equal representation is maintained in the European Parliament, including during maternity/paternity/parental leave;

<sup>&</sup>lt;sup>65</sup> European Parliament legislative <u>resolution</u> of 3 May 2022 on the proposal for a Council Regulation on the election of the members of the European Parliament by direct universal suffrage, repealing Council Decision (76/787/ECSC, EEC, Euratom) and the Act concerning the election of the members of the European Parliament by direct universal suffrage annexed to that Decision (2020/2220(INL) — 2022/0902(APP))



<sup>&</sup>lt;sup>63</sup> <u>Directive</u> (EU) 2022/2381 of the European Parliament and of the Council of 23 November 2022 on improving the gender balance among directors of listed companies and related measures

<sup>&</sup>lt;sup>64</sup> European Parliament Think Tank, Women in politics in the 2024 election year, 5 March 2024



- Require the application of gender equality to candidate lists for national and/or Union-wide constituency lists and encourage the use of gender zipped lists;
- Ensure full legal capacity, including the right to vote and stand as a candidate for women with disabilities.
- We acknowledge the European Commission's President's efforts and her commitment to improving gender balance within the European Commission and its senior management—an important and commendable step forward. However, we urge the Commission to adopt more concrete and ambitious measures such as policies on diversity, equality and inclusion.
- We call on the European Commission to establish within its internal regulations mandatory parity in the nomination and designation of Commissioners.
- The EWL calls for <u>future dedicated standalone portfolio on gender equality.</u>



# 6. Institutional mechanisms that deliver on women's rights – Roadmap principle 8

The EWL agrees with the Roadmap when it underlines that advancing women's rights requires effective gender mainstreaming, strong public policies, financing and solid institutional infrastructure, as well as gender-sensitive research, data collection, design and planning that address women's needs with an intersectional approach.

Specifically, the EWL appreciates that the Roadmap mentions **effective gender mainstreaming in all policy areas and in budgets**, including the EU budget. As stated in Article 8 of the TFEU<sup>66</sup> 'In all its activities, the Union shall aim to eliminate inequalities, and to promote equality, between men and women' and it is the Commission's duty to ensure this legal obligation is upheld.

To ensure that EU economic and budgetary policies actively contribute to gender equality, the EWL proposes the following integrated measures:

### 6.1 Institutional Leadership and Governance

### A DEDICATED COUNCIL CONFIGURATION ON GENDER EQUALITY

The EWL calls on the **Council to create a dedicated formation on gender equality**<sup>67</sup>. Currently, there is no structural mechanism on gender equality at Council level. In 2018, during the Austrian presidency, an **informal** configuration of Ministers responsible for gender equality met for the first time since 2011. This results in informal Council meetings of Ministers and Secretaries of State in charge of equality being organised only if a Council Presidency sees it as a priority and therefore hinges on the political will and priorities of a given Member State. Spain organised an informal meeting in 2023, Belgium in 2024 and Poland in 2025.

- It is now time to **formalise a dedicated structural mechanism within the Council**, which would also ensure **gender mainstreaming** across all Council formations. Article 8 TFEU<sup>68</sup> lays down the principle of gender mainstreaming under which the EU should aim to eliminate inequalities, and to promote equality, between men and women in all its activities. The **2020-2025 European Commission Strategy on Gender Equality** prioritises gender mainstreaming and the **European Court of Auditors** in its 2021 report<sup>69</sup> highlights the failure to adequately integrate a gender mainstreaming approach in the EU budget despite political commitment to do so.
- The lack of spaces to discuss and institutional ramifications by the Ministers responsible slows down progress and creates a disjointed approach across different Council formations. Even if the Employment, Social Policy, Health and Consumer Affairs Council (EPSCO) addresses

<sup>&</sup>lt;sup>69</sup> European Court of Auditors, Special Report 10/2021: Gender mainstreaming in the EU budget: time to turn words into action



<sup>&</sup>lt;sup>66</sup> Article 8 of the Treaty on the Functioning of the European Union (TFEU)

<sup>&</sup>lt;sup>67</sup> The need for a dedicated Council configuration on gender equality, European Parliament <u>resolution</u> of 17 December 2020 on the need for a dedicated Council configuration on gender equality (2020/2896(RSP)) (2021/C 445/18)

<sup>&</sup>lt;sup>68</sup> Article 8 of the Treaty on the Functioning of the European Union (TFEU)



some aspects of gender inequality in the fields of employment and social affairs, it is not adequately connected with the systemic, structural and transversal issues of gender equality in other domains.

- An important role of a Council formation on Gender Equality in addition to setting the agenda
  and advancing legislation would be to track implementation and progress including
  monitoring the EU Gender Equality Strategy 2026-2030 and annual reports as well as linking
  to the EIGE Gender Equality Index<sup>70</sup> to identify areas for additional attention and
  harmonisation of approaches.
- The creation of a dedicated Council configuration would also demand more dedicated capacity and skills within the Council and Permanent Representations to ensure quality preparation and follow-up of files in the Council. This would also enable a greater alignment with existing fora such as the High-Level group on Mainstreaming, the Advisory Committee on equal opportunities for women and men and the EIGE Management Board.
- A dedicated Council on Gender Equality would allow more attention and capacity to address
  the distinct and intersectional forms of discrimination that racialised women, women
  belonging to ethnic, religious, and linguistic minorities, older women, women with disabilities,
  Roma women, LGBTQI women, refugee and migrant women, and women at risk of social
  exclusion.

### A EUROPEAN COORDINATOR ON VIOLENCE AGAINST WOMEN

• The EWL calls on the European Commission to appoint an EU Coordinator on violence against women and girls at Cabinet level. The EU Coordinator should have a strong political mandate, resources and responsibility to coordinate the implementation of the Istanbul Convention<sup>71</sup>, transposition and implementation of the Directive VAW and oversee the revision process, implementation of the Directive on Trafficking in Human Beings<sup>72</sup>, the (forthcoming) Victims Rights Directive<sup>73</sup>, to ensure that all of these legislative frameworks are coherent.

### 6.2 Budgets that mirror priorities on women's rights and gender equality

The EWL advocates for **gender budgeting** and calls on the EU and Member States to respect their duty to promote gender equality in all policies, including budgets, funds and investments including through the European Investment Bank (EIB)<sup>74</sup>.

To this end, the EWL recommends the Commission to:

<sup>&</sup>lt;sup>74</sup> See EIB: Gender equality and women's economic empowerment



<sup>&</sup>lt;sup>70</sup> EIGE, Gender Equality Index 2024: Sustaining momentum on a fragile path, 10 December 2024

<sup>&</sup>lt;sup>71</sup> Council of Europe <u>Convention</u> on preventing and combating violence against women and domestic violence

<sup>&</sup>lt;sup>72</sup> <u>Directive</u> (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims

<sup>&</sup>lt;sup>73</sup> <u>Directive</u> 2012/29/EU of the European Parliament and of the Council of 25 October 2012 establishing minimum standards on the rights, support and protection of victims of crime, and replacing Council Framework Decision 2001/220/JHA



- Follow-up on the recommendations set out in the European Court of Auditors report<sup>75</sup> on Gender mainstreaming the EU budget.
- Carry out impact assessments for gender mainstreaming in all budgetary decisions, with mechanisms for monitoring implementation and evaluating outcomes.
- Together with Directorate-General for Budget (DG BUDG) carry out inclusive stakeholder consultations on public spending, with a specific role for feminist economists and civil society experts.
- **Develop a 'Gender-Responsive Budgeting Toolkit'** building on existing tools including the EWL<sup>76</sup> and those developed by EIGE, for EU institutions and Member States to provide practical guidance and technical assistance for integrating gender considerations into all stages of public financial management.
- Initiate an inter-institutional (with the European Parliament) and annual public hearing on the gender impact of the EU budget *ex-ante* and *ex-post*.

### 6.3 Resourcing Women's Rights and Gender Equality

The EWL urges the Commission to ensure women's organisations have enough resources and funding to continue the crucial work they are doing, especially in such tumultuous times and in the context of the backlash towards women's rights and human rights. The EWL calls on the Commission to:

- Substantially increase funding for women's organisations to counterbalance the backlash on women's rights, services, advocacy, grass-root initiatives, evidence-based research, and feminist activism.
- Mandate accessibility requirements for all EU-funded gender equality programmes and services. This includes physical accessibility, digital accessibility, and accessible communication formats.
- **Design fund integration programmes specifically for migrant women** and focus on language acquisition, vocational training, access to employment, and combating isolation.
- Respect for European values and fundamental rights must remain the core of conditionality criteria to access EU funding. Therefore, countries that refer to civil society organisations as 'foreign agents' 57 should be refrained from accessing funds.

<sup>&</sup>lt;sup>77</sup> See: <a href="https://www.parlament.hu/irom42/11923/11923.pdf">https://www.parlament.hu/irom42/11923/11923.pdf</a>, proposed legislation in Hungary under the auspices of the 'Sovereignty Protection Office', on the funding of NGOs (non-governmental organisations) and (some) media.



<sup>&</sup>lt;sup>75</sup> European Court of Auditors, Special Report 10/2021: Gender mainstreaming in the EU budget: time to turn words into action

<sup>&</sup>lt;sup>76</sup> EWL Gender Budgeting Toolkit now translated into eight new languages - European Women's Lobby



- Ensure sufficient resources to combat violence against women and girls, particularly within the (future) Daphne Programme, and provide sustainable funding for civil society organisations.
- Strengthen financial support for women's rights within the EU's external actions, ensuring consistent commitment beyond EU borders.
- Guarantee adequate and sustainable funding for the EWL and its members, the key civil
  society partner of the EU on women's rights and gender equality.
- Guarantee adequate and sustainable funding for EIGE, the only EU agency that provides solid
  data and research on gender equality throughout the EU, including the Gender Equality
  Index<sup>78</sup>.

### 6.4 Specific issues relating to the Multiannual Financial Framework (MFF): 2028-2034

The Gender Equality Strategy 2026-2030 will be implemented in the final stages of negotiations for MFF 2028-2034. Therefore, it is crucial at that gender mainstreaming is a core mission and objective of the future MFF, both in terms of expenditure and income ('Own Resources'). The EWL recommends the following:

- Gender equality is a transversal objective and should be defined as such in the Common Provisions Regulation<sup>79</sup>, which would subsequently be applicable to all funds in conformity with the EU's objective on and commitment to gender mainstreaming.
- We strongly call upon the Commission to ensure in the negotiations that the future MFF commits adequate financing for gender equality obligations, to require gender-responsive budgeting in all EU-funded programmes, notably in applying the Public Expenditure and Financial Accountability (PEFA) Supplementary Framework for Assessing Gender Responsive Public Financial Management<sup>80</sup> and adopting the Sustainable Development Goals (SDG), including indicator 5.c.1. on gender budgeting<sup>81</sup>.
- The Commission should also ensure results-based monitoring, evaluation and oversight, and should improve its digital systems for monitoring and evaluating outputs, outcomes and impacts tied to expenditure of these, including for gender equality aims. The Commission should also maintain the gender equality commitments in external financing, building on the Neighbourhood, Development and International Cooperation Instrument.

<sup>81</sup> https://sdgs.un.org/goals/goal5



<sup>&</sup>lt;sup>78</sup> EIGE, Gender Equality <u>Index</u> 2024: Sustaining momentum on a fragile path, 10 December 2024 and upcoming annual indexes

<sup>&</sup>lt;sup>79</sup> Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy

<sup>&</sup>lt;sup>80</sup> PEFA, Supplementary Framework for Assessing Gender Responsive Public Financial Management



- The EWL strongly calls on the Commission to establish a dedicated 'Intersectional Equality Fund' within the next MFF. This fund would specifically support grassroots women's rights organizations working with marginalised communities (e.g., Roma women, women with disabilities, migrant women, LGBTIQ+ women, rural women) to address their unique challenges and promote their empowerment. In general, the EU should earmark at least 1% of the total EU budget directly to gender equality initiatives and women's rights organisations.
- In light of the proposed 'new' mechanisms to deliver funding through National Reform Programmes (NRPs) it is crucial that civil society organisations and women's organisations in particular, are an integral part of the whole process; funding should be available for meaningful, participatory engagement.
- 6.5 Explore EU accession to the Convention on the Elimination of all forms of discrimination against women (CEDAW)
  - The EWL urges the European Commission to prioritise and actively pursue the EU's ratification of the Convention on the Elimination of All Forms of Discrimination Against Women<sup>82</sup> (CEDAW), as a vital step in upholding women's rights and strengthening the EU's global leadership on gender equality.

<sup>&</sup>lt;sup>82</sup> United Nations, <u>Convention</u> on the Elimination of All Forms of Discrimination against Women, 18 December 1979





### 7. Women in conflict

The European Commission and the European External Action Service (EEAS) should work hand in hand to ensure their policies on women in conflict areas, security and peace building are coherent and aligned. The Strategy should strengthen the EU's commitment to the Women, Peace and Security (WPS) agenda and increase women's meaningful participation in peacebuilding, conflict prevention, and post-conflict recovery efforts globally. The new Strategy should reflect the progress made on gender in the EU's external policies, while aiming to go even further to ensure the safety of women.

### 7.1 Condemnation of Sexual Violence as a Weapon and Tactic of War

- The EWL condemns the use of sexual and gender-based violence as a weapon and tactic of war. Such acts constitute grave violations of international human rights law and international humanitarian law, and represent one of the most brutal and deliberate strategies used to terrorise, displace, and destroy communities during conflict.
- The EWL urges the EU and international community to adopt a zero-tolerance approach and ensure full enforcement of legal frameworks in particular the Rome Statute<sup>83</sup>, which recognises rape, sexual slavery, (enforced) prostitution, forced pregnancy, and other forms of sexual violence as war crimes and crimes against humanity.
- The EWL urges to fully implement the EU Gender Action Plan III<sup>84</sup> until its revision in 2027 and take additional measures to ensure that 85% of all new measures in external relations contribute to gender equality and the empowerment of women.

### 7.2 Protecting the health and rights of women and children in conflicts

The EWL highlights the urgent need to protect the health and rights of women and children in conflict areas. Displacement, violence, and destruction of healthcare systems leave them without access to essential services, including maternal care, child health, sexual and reproductive healthcare, and mental health. The EWL calls on the European Commission, the EEAS, and EU Member States to:

- Guarantee the provision of comprehensive SRHR in all humanitarian and conflict-related responses;
- Sustain and increase funding aligned with EU strategies on global health and Women, Peace, and Security;
- Ensure gender-responsive humanitarian programming that guarantees access to food, healthcare, income, safe spaces, and support services for women and children;
- Support local partnerships and women-led organisations through transparent, inclusive planning and funding mechanisms;

<sup>&</sup>lt;sup>84</sup> Joint <u>Communication</u> to the European Parliament and the Council, EU Gender Action Plan (GAP III), An Ambitious agenda for gender equality and women's empowerment in EU external action



<sup>83</sup> International Criminal Court, Rome Statute



• Strengthen justice mechanisms, survivor support, and prevention measures to effectively combat gender-based violence in crisis contexts.

### 7.3 Poverty – an aggravating circumstance in situations of conflict and war

The EWL emphasises that women's poverty is both a driver and consequence of conflict and displacement. In crisis-affected areas, women face limited access to income, education, and protection, which increases their vulnerability and excludes them from engaging in peacebuilding. The EU must prioritise women's economic empowerment through gender-responsive recovery plans, social protection, and structural reforms with due consideration for intersectional factors.

- 7.4 Promoting gender balance in participation and leadership in the prevention management and resolution of conflicts and crisis, preparedness, security and peace building
  - The EWL calls for gender-balanced participation and leadership in all phases of peace and security, including conflict prevention, crisis response, and peacebuilding. Women remain significantly underrepresented in formal peace processes and decision-making structures, undermining both inclusiveness and effectiveness. The EU must ensure meaningful and diverse participation of women, including through binding targets and quotas, support for women's organisations, and systematic gender analysis.
  - The EU should concretely **implement the United Nations' Resolution 1325**<sup>85</sup> **and the EU** <u>Women, Peace and Security agenda</u>, including through: (*i*) the introduction of 50-50 gender quotas in all peace negation processes (prevention and resolution of conflicts, post conflict reconstruction, humanitarian aid...); (*ii*) the renewal of the EU Action Plan on Women, Peace and Security<sup>86</sup>; (*iii*) the systematic cooperation with women's rights organisations (both locally and globally) and (*iv*) sufficient guarantees that women's rights organisations are adequately resourced and funded to effectively counter denial and rejection of this agenda.
  - The Strategy should integrate gender equality as a core principle in all EU humanitarian aid
    to ensure that humanitarian responses address the specific needs and vulnerabilities of
    women and girls in crises.

### 7.5 Gender in external relations and development cooperation

 The Strategy should mandate gender impact assessments for all EU trade, investment, and development cooperation agreements with the aim to ensure that these agreements promote gender equality and do not lead to adverse outcomes for women in partner countries.

<sup>&</sup>lt;sup>86</sup> EU Action Plan on Women, Peace and Security (WPS), 2019 – 2024



<sup>85</sup> UN Security Council Resolution 1325 on Women, Peace and Security (WPS Agenda), 31 October 2000



### **Conclusions**

Achieving full and effective equality between women and men is a political choice. It requires strong leadership to pave the way to this ultimate goal. The current Gender Equality Strategy (2020-2025) sets the sign post for an ambitious way forward for which the future Strategy (2026-2030) should build on in this fast changing tumultuous world.

The EWL believes in the EU's commitment, determination and ambition to make the EU a place where women's rights and gender equality are the cornerstone of a well-functioning, healthy society for the benefit of all. We owe it to the present and future generations.

The EWL stands ready to accompany this journey.



# Annex – List of Recommendations for each chapter of this document

### Violence against Women as a continuum

- 1. Ensure the ratification of the Istanbul Convention by all Member States
  - Ensure full ratification of the Istanbul Convention by all Member States and actively encourage national engagement.
  - Support robust monitoring and implementation of the Istanbul Convention by all Member States, conduct country-specific analyses, and fund Women's civil society to produce Shadow Reports on its implementation and monitoring at the national and EU level.
- 2. Guide the transposition and implementation of the Directive on Combatting Violence against Women and Domestic Violence (Directive VAW) and Revise it to improve the Directive post transposition

#### **Scope**

- **Scrupulously monitor and support the transposition and implementation** of Directive VAW across all Member States. Provide technical guidance and ensure compliance with EU standards to guarantee equal protection for women across the European Union.
- **Expand the scope of the Directive VAW** to include rape based on lack of consent, sexual harassment, forced sterilisation, and femicide.
- Include violence against women in the list of Eurocrimes under Article 83.1 TFEU.
- Establish an EU-wide data strategy for the systematic collection of qualitative, disaggregated data on the different groups of women affected by violence.
- **Integrate a disability lens in anti-violence policies:** Mandate specialised training for professionals (police, healthcare, justice...) on the specific forms of violence and exploitation faced by women with disabilities. Ensure accessible reporting mechanisms support services and victim support structures.
- Develop binding EU-level guidelines for gender-sensitive asylum procedures to address the specific risks faced by migrant, refugee, and asylum-seeking women. These should include comprehensive vulnerability assessments, trauma-informed and gender-appropriate interview procedures, and ensure safe, respectful, and dignified reception and accommodation conditions throughout the asylum process.
- Develop a 'Gender Equality Scorecard'.
- **Ensure the participation of survivors** in EU and national law and policy decisions on gender-based violence.
- Make justice systems more supportive and accessible for survivors.
- **Emphasise the need to address sexual violence during wars and armed conflicts**, recognising it as a systematic weapon of war.
- Address parental alienation and recognise such situations as aggravating circumstances.

#### Cyber Violence against Women (CVAW)

- Ensure **Directive VAW includes strong legal protections** for all women and girls against online abuse and technology-based violence.



- Require Member States to exceed minimum standards when transposing articles 5, 6, 7, 8 of Directive VAW.
- **Define rape in EU law** as sex without freely given consent, eliminate references to the intentionality of the conducts and 'serious harm'.
- Include the production and dissemination of pornographic material depicting acts of sexual exploitation in the revision of Directive VAW (the crime should cover all forms of image based sexual digital forgeries, including pornography).
- Develop an additional protocol to the Budapest Convention on Cybercrime to specifically address cyberviolence targeting women in public roles, including politics, activism, journalism, and advocacy.
- Incorporate Council of Europe Recommendations CM/Rec(2022)16 on hate speech and hate crimes into EU law, ensure translations in all official EU languages, and promote widespread dissemination among national stakeholders.
- **Adopt a final Victims' Rights Directive** that explicitly recognises the gendered nature of cyberviolence and guarantee tailored rights and support services for victims.
- Require National Authorities to align Directive VAW's transposition with the DSA to hold digital platforms accountable for preventing online gender-based violence.
- Adopt harmonised EU-wide legal and statistical definitions of cyberviolence against women, based on EIGE classifications, to close legal gaps and improve data comparability.
- **Develop EU guidelines and indicators** to help Member States systematically collect high-quality, detailed data on cyberviolence against women.

### Artificial Intelligence and VAW

- Require mandatory fundamental rights impact assessments (article 27, Al Act) for all Al systems to prevent discrimination by gender, race, or other factors.
- **Carry out a gender equality impact assessment of the AI Act** in the next Gender Equality Strategy and propose necessary revisions to improve protections.

### 3. Ban Prostitution and adopt the Equality Model:

- **Recognise prostitution as a form of gender-based violence,** exploitation of inequality, and a violation of human dignity and human rights, **and commit to its abolition.**
- End repressive measures against persons in prostitution, criminalise all forms of procuring, fund exit programs and real alternatives for those in prostitution, prohibit the purchase of sexual acts, implement prevention and education policies promoting equality and positive sexuality, and develop prevention policies in countries of origin.
- Adopt the Equality Model (Nordic Model), decriminalising persons in prostitution and criminalising sex buyers and exploiters. Promote convergence with Member States already applying this model and expose the risks of fully legalised prostitution systems that facilitate trafficking.
- Ensure the Gender Equality Strategy strengthens EU action against human trafficking and protect the rights of migrant women by improving cross-border cooperation, offering specialised victim support, and ensuring safe reporting channels.
- Prioritise **comprehensive exit support** for women in prostitution, including healthcare, housing, legal and migration aid, social protection, and employment.

### 4. EU Pillar of Social Rights

- Recognise services for women affected by violence as essential services under Principle 20 of the European Pillar of Social Rights.



- Prioritise the gender-sensitive implementation of the European Pillar of Social Right and present an ambitious new Action Plan that integrates a gender perspective throughout and includes concrete targets and indicators for every principle.

### Ensuring the highest standards of health

### 1. Access to safe and legal abortion

- Guarantee that all women and girls in Europe and worldwide have the right to safe abortion services, free from legal and practical barriers.
- **Develop comprehensive guidelines on abortion care** aligned with World Health Organization (WHO) standards.
- Facilitate the exchange of best practices among EU member states and establish robust monitoring, guidance, and data collection systems. Ensure the monitoring of data collection systems gaps.
- Advocate for the right to abortion to be included in the EU Charter of Fundamental Rights while supporting interim measures like the proposals in the 'My Voice, My Choice' petition.
- Call for a comprehensive revision of EU pharmaceutical legislation, including the EU
  Medicines Directive and the Critical Medicines Act, and the subsequent update of the EU's
  Critical Medicines List.
- Ensure that the next Multiannual Financial Framework allocates sufficient resources for women's health, particularly Sexual and Reproductive Health and Rights (SRHR), within programs such as EU4Health. Support government policies that help cover all or part of the cost of abortion-related healthcare.
- Strengthen EU commitments and actions to advance SRHR globally as part of the EU's (feminist) foreign policy.
- **Reject any attempts to regress on abortion rights within the EU**. Ensure strong institutional support for human rights defenders and CSOs working on abortion and SRHR, protecting them from intimidation, legal threats, or operational restrictions.

### 2. Call for a Lifecycle approach to Women's health

- Adopt an approach that encompasses the entire lifecycle of women (childhood, adolescence, mid-life and older women) and address women's specific health issues.
- Support the development of sex- and gender-disaggregated health data systems across Member States.
- Promote research into women-specific illnesses that are often under-researched or misdiagnosed.
- Mandate the systematic integration of sex and gender analysis in all EU-funded health research
- **Focus on preventive health and health promotion across the lifecycle,** with specific attention to the needs of adolescent girls and older women.
- Address health disparities faced by marginalised women.
- Ensure that a **minimum proportion of national health budgets** is allocated to delivering universal, inclusive healthcare underpinned by gender and equality principles.



- **Ensure access to menstrual and hygiene products** by providing free or low-cost menstrual and hygiene products, especially to women facing poverty, homelessness, or disability, treating these as basic healthcare and dignity needs.
- Guarantee all migrant, refugee, and asylum-seeking women access to essential services like healthcare, legal support, and psychosocial care—regardless of their legal status.
- Ensure equitable access to innovative health technologies and quality treatments for all women, regardless of socioeconomic status or geographic location.
- **Promote the delivery of high-quality, human rights-based maternity services** across all Member States by encouraging the co-design of national maternity strategies in collaboration with civil society and women's organisations.
- Promote cross-country learning and monitoring mechanisms to uphold women's right to health in all its diversity.
- 3. Ensure an explicit and gender-specific focus to mental health
  - Support and invest in the gender-sensitive implementation of national mental health policies across Member States and encourage the development of inclusive, traumainformed and community-based services that improve access and outcomes for all.
  - Promote gender-sensitive health services that address the unique stressors and expression of mental illnesses for women at all stages of their life based on the 'do no harm' principle and including trauma-informed care for survivors.
  - Increase research and data collection on gender differences in mental health conditions, access to care and treatment outcomes.
  - Recognise and address the mental health impact of caregiving responsibilities on women, including burnout and stress for both formal and informal carers.
  - Mental health must be embedded in wider health and social care systems through early intervention and prevention.
  - Fund EU-wide awareness campaigns about mental health, treatments and support.
- 4. Gender equality within the healthcare workforce
  - **Promote gender parity in leadership and decision-making roles** within national and EU health institutions.
  - Address gender pay and pension gaps within the healthcare workforce.
  - **Ensure gender-sensitive training and education for all healthcare professionals** to provide non-discriminatory and respectful care.
  - Combat harassment and violence within the healthcare workplace, protecting predominantly female workers

### A Feminist Economic Framework

- Use, as a premise to create a shift towards a feminist economy, the recommendations of the EWL's Purple Pact.
- Conduct gender impact assessments of the EU's macroeconomic framework, integrating
  data from the EIGE (Gender Equality Index), and ensuring macroeconomic and social policy
  reports integrate a gender perspective.



- Revise outdated male-breadwinner models in favour of an equal-earner—equal-carer approach. Instead, support equal sharing of work and care, including establishing care credits (i.e. recognition of periods out of the labour-market for caring responsibilities are accounted for in pension calculation (number of years requirements) for pension rights to both women and men).
- Systematically use Country-Specific Recommendations (CSRs) to highlight gendered impacts of economic policies and strengthen commitments to gender equality in National Reform Programmes (NRPs).

### In relation to climate policies

- Recognise environmental issues as integral to feminist economics.
- Mandate gender impact assessments for all new EU climate and environmental policies and funding programs.
- Integrate gender mainstreaming into climate change adaptation policies.
- Allocate dedicated funding within EU climate and energy programmes to support women's leadership and participation in the green economy.
- Ensure all EU and national climate policies are gender-responsive, equality-driven, and poverty-proofed, including through the Just Transition framework so that the European Green Deal actively reduces—rather than reinforces—existing gender inequalities across Member States.
- Develop guidelines for Member States on incorporating a gender perspective into National Energy and Climate Plans (NECPs): Focus on energy poverty experienced disproportionately by women and promote women's roles in local energy communities.
- 1. Equal pay and economic empowerment
- Ensure implementation of the Pay Transparency Directive by monitoring, coordinating, and assessing its impact across Member States to close gender pay gaps and promote women's economic independence.
- Address the protection of vulnerable women in the Gender Equality Strategy and ensure the inclusion of a gender dimension in the next EU Anti-Poverty Strategy.
- Further facilitate and encourage national policy and sectoral social dialogue measures for more equal career progressions, transparent recruitment practices and against algorithmic discrimination in hiring procedures.
- Advance women's financial empowerment by conducting gender impact assessments of the EU financial and capital policies (such as all policies covered by the Savings and Investments Union) and promoting gender-sensitive financial literacy campaigns.
- Address the persistent inequalities in paid and unpaid work.
- Ensure gender-sensitive pension reforms that consider women's lifecycle patterns and consider breaks in employment due to care responsibilities, with strong EU leadership to guide reforms:
  - Take measures to ensure the Member States strengthen the first pillar rather than shift to the 2<sup>nd</sup> and 3<sup>rd</sup> pillar.
  - Introduce universal, state-funded pension systems that are benchmarked to average earnings to ensure an adequate standard of living for all older people, particularly women who are disproportionately affected by pension gaps due to unpaid care, part-time work, and lower lifetime earnings.
  - Develop European standards on care crediting.



- Make other recommendations on how Member States should make their pension systems more gender equal particularly in the context of country-specificrecommendations in the European Semester process (e.g. individualisation of pension rights).
- Benchmark social protection payments and supports against a Minimum Essential Standard of Living (MESL) that reflects the real cost of living.
- Set national targets for reducing the at-risk-of poverty of elderly women and monitor their attainment.
- Set national care targets for care for elderly and dependent family members and monitor the implementation (follow-up the European Care Strategy);
- Assess the Directives on part-time work and fixed-terms contracts from a gender equality perspective and assess specifically the impact of part-time work on women's pension income;
- Carry out a comparative study on gender aspects implied in 2<sup>nd</sup> and 3<sup>rd</sup> pillar pension schemes.
- Continue to monitor the application of the European Court of Justice ruling on the Test-Achat case to funded pension schemes.

### 2. Work-life balance and care

- Recognise the central value of care work, including its economic value.
- Expand the current European Care Strategy by introducing a comprehensive 'Care Deal' for Europe, in synergy with the European Green Deal.
- **Conduct an EU-wide study on men's uptake of leave** under the Work-Life Balance Directive to evaluate its impact and identify barriers to shared caregiving responsibilities.
- Revise the Maternity Leave Directive to close gaps in maternity leave provisions across the EU, ensuring equal rights for all women under the principles of free movement and equal treatment.
- **Support the EU's accession to the ILO Domestic Workers Convention** to protect labour rights in the care sector, with special attention to migrant women.
- 3. Equal employment opportunities and adequate working conditions
- Establish quotas in sectors that are underrepresented in education and employment, including those characterised by gender segregation (STEAM, ICT).
- Conduct Gender equality impact assessments on the Platform Work Directive.
- **Provide specific protections for women in artistic and cultural sectors**, addressing gender inequalities, limited labour opportunities, and harassment:
  - Develop an EU Charter for Gender Equality in the Cultural and Creative Sectors: This
    charter would outline principles and best practices for addressing gender-based
    inequalities, including equal pay, representation, and combating harassment.
  - Support mentorship and networking programs for women in cultural leadership roles: Address the 'glass ceiling' in cultural institutions and industries.
  - Fund research and data collection on gender inequalities in specific cultural subsectors: Identify pay gaps, underrepresentation, and prevalence of harassment (e.g., in film production, music industry, visual arts).
  - Promote the inclusion of gender equality criteria in EU cultural funding programs:
     Encourage projects that feature women's voices, stories, and leadership



- **Ensure gender mainstreaming in social action plans,** and guarantee women entrepreneurs access to social support and financing.
- Carry out gender impact assessments of the Public Procurement Directive and revise it on the basis of the results, to ensure that gender mainstreaming is a conditionality of all public procurement policies and rewards.
- **Urgently address gender-based violence and harassment in the workplace.** The new Strategy should provide tools to strengthen policies and workplace practices implementing instruments such as the ILO Convention 190.
- **Strengthen trade unions and social partners** in creating safer workplaces, protecting victims of workplace violence, and working closely with national equality bodies.
- **Ensure reasonable accommodation for women and girls with disabilities** to ensure full participation in the open labour market and community.

### **Quality and inclusive education**

- **Expand STEAM education for all** by promoting gender-balanced participation in these areas, challenging stereotypes and supporting diverse career pathways for both girls and boys.
- **Integrate sexuality education in all Member States**, focusing on consent, gender equality, and health, delivered by trained professionals to promote mutual respect and prevent gender-based violence.
- Address the issue of abusive and degrading pornography targeting women as a contributing factor to the rise of teen violence and abuse.
- Address toxic masculinities through education and public campaigns by embedding healthy
  masculinity and anti-violence programmes in schools and youth services, tackling the harms
  of pornography and prostitution, and funding EU-wide campaigns featuring male role models
  who promote gender equality, shared caregiving, and non-violence to drive cultural and
  systemic change.
- Hold online platforms accountable and regulate harmful content.
- **Include male accountability in anti-violence strategies** by embedding specific measures on male behaviour in national action plans, while safeguarding funding for women's organisations.
- Promote cooperation among Member States by facilitating the exchange of good practices, joint training, and collaboration with civil society, especially feminist and women's organisations.
- **Ensure inclusive education and employment for women of all groups** by implementing targeted measures such as training, mentorship, and quotas to support women with disabilities, racialised women, queer women, and other underrepresented groups.

### Political participation and equal representation

- **Monitor the implementation of the Women on Boards Directive** by ensuring dedicated resources to meet the 2026 gender targets.
- Introduce binding quotas to accelerate women's representation across all political and institutional levels, addressing structural inequalities, gender biases in electoral systems and unequal division of power between men and women.
- Ensure gender equality is a core principle of the ongoing EU electoral law reform:
  - Make gender equality a horizontal principle of the European elections and a minimal democratic standard;
  - Establish gender mainstreaming in all the activities of the European Union;





- Call for mandatory gender balance on candidate lists;
- Foster parity and call for the adoption of concrete measures to ensure candidate lists
  have an equal number of male and female candidates, such as the use of zipped lists
- Ensure a gender-equal representation is maintained in the European Parliament, including during maternity/paternity/parental leave;
- Require the application of gender equality to candidate lists for national and/or Unionwide constituency lists and encourage the use of gender zipped lists.
- Ensure full legal capacity, including the right to vote and stand as a candidate for women with disabilities.
- Establish binding internal rules for parity in the College of Commissioners and creating a dedicated standalone portfolio on gender equality within the European Commission.

### Institutional mechanisms that deliver on women's rights

- 1. Institutional Leadership and Governance
- Establish a formal Council formation on Gender Equality
- Appoint at Cabinet level an EU Coordinator on Violence Against Women and Girls with a strong political mandate, sufficient resources, and clearly defined responsibilities.
- 2. Budget that mirror priorities on women's rights and gender equality
- Follow up on the European Court of Auditors' recommendations on gender mainstreaming the EU budget.
- **Conduct gender impact assessments for all budgetary decisions**, with clear monitoring and evaluation mechanisms to measure effectiveness.
- Collaborate with DG Budget to hold inclusive stakeholder consultations on public spending, prioritising feminist economists and civil society experts in the discussions.
- **Develop a Gender-Responsive Budgeting Toolkit** building on existing tools including those developed by EIGE, for EU institutions and Member States and offering practical guidance and technical support for integrating gender across all public financial management stages.
- Initiate an inter-institutional (with the European Parliament) and annual public hearing on the gender impact of the EU budget *ex-ante* and *ex-post*.
- 3. Resourcing Women's Rights and Gender Equality
- Substantially increase funding for women's organisations to counterbalance the backlash on women's rights, services, advocacy, grass-root initiatives, evidence-based research, and feminist activism.
- Mandate accessibility requirements for all EU-funded gender equality programmes and services.
- Develop fund integration programmes for migrant women, emphasising language learning, vocational training, job access, and social inclusion.
- **Enforce EU values as a funding condition**, withholding funds from countries labelling civil society organisations as 'foreign agents'.
- **Ensure sufficient and sustainable resources to combat violence against women**, particularly through the future Daphne Programme and civil society support.
- Strengthen financial support for women's rights in EU external actions to uphold commitments beyond EU borders.



- **Guarantee sustained funding for EWL, its members and EIGE** to support women's rights advocacy and gender equality research, including the Gender Equality Index.
- 4. Specific issues relating to the Multiannual Financial Framework (MFF)
- Make gender equality a transversal objective explicitly defined in the Common Provisions Regulation, applying to all EU funds in line with the EU's gender mainstreaming commitment.
- **Ensure adequate financing for gender equality** in the new MFF by requiring genderresponsive budgeting across all EU-funded programmes, applying tools such as the PEFA Gender Framework and aligning with SDG indicator 5.c.1.
- **Strengthen monitoring and evaluation systems** by improving the European Commission's digital tools to track results-based outcomes and impacts related to gender equality spending, including in external financing (NDICI).
- **Establish a dedicated 'Intersectional Equality Fund**' within the next MFF to support grassroots women's organisations working with marginalised groups. In general, the EU should earmark at least 1% of the total EU budget directly to gender equality initiatives and women's rights organisations.
- Guarantee meaningful participation of civil society and women's organisations in National Reform Programmes, with accessible funding for inclusive and participatory engagement at all stages.
- 5. Explore EU accession to the Convention on the Elimination of all forms of discrimination against women
- Prioritise and actively pursue the EU's ratification of the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW).

### Women in Conflicts

- Align policies between the European Commission and EEAS on women in conflict and security.
- Reinforce the EU's commitment to the Women, Peace and Security (WPS) agenda.
- Reflect the progress made on gender in the EU's external policies.
- 1. Condemnation of sexual violence as a weapon and tactic of war
- Condemn and act against the use of sexual and gender-based violence as a weapon of war and ensure urgent action to hold perpetrators accountable.
- Adopt a zero-tolerance policy towards conflict-related sexual violence and fully enforce existing international laws such as the Rome Statute.
- Fully implement EU Gender Action Plan III and ensure 85% of all external actions promote gender equality.



- 2. Protecting the health and rights of women and children in conflicts
- **Ensure the provision of comprehensive SRHR** in all humanitarian and conflict-related responses.
- Sustain and increase funding aligned with EU strategies on global health and Women, Peace, and Security.
- Ensure gender-responsive humanitarian programming that guarantees access to food, healthcare, income, safe spaces, and support services for women and children.
- **Support local and women-led organisations** through inclusive planning and transparent funding in all crisis-related actions.
- Strengthen justice mechanisms, survivor support, and prevention measures to effectively combat gender-based violence in crisis contexts.
- 3. Poverty an aggravating circumstance in situations of conflict and war
- Address women's poverty as both cause and effect of conflict and displacement.
- **Prioritise women's economic empowerment** through gender-responsive recovery plans and social protection, and structural reforms with due consideration for intersectional factors.
- 4. Promoting gender balance in participation and leadership in the prevention management and resolution of conflicts and crises, preparedness, security and peacebuilding
- Ensure gender-balanced participation and leadership in all areas of peace and security, including conflict prevention, crisis response, and peacebuilding, by using binding targets, quotas, and support for women's organisations.
- **Fully implement Resolution 1325** and the EU WPS agenda, including through the introduction of 50-50 gender quotas in all peace processes and post-conflict efforts.
- Renew the EU Action Plan on Women, Peace and Security.
- Guarantee sustained funding and cooperation with women's rights organisations at all levels.
- Integrate gender equality as a core principle in all EU humanitarian aid.
- 5. Gender in external relations and development cooperation
- **Require gender impact assessments** for all EU trade, investment, and development cooperation agreements to make sure they help, not harm, women in partner countries.



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