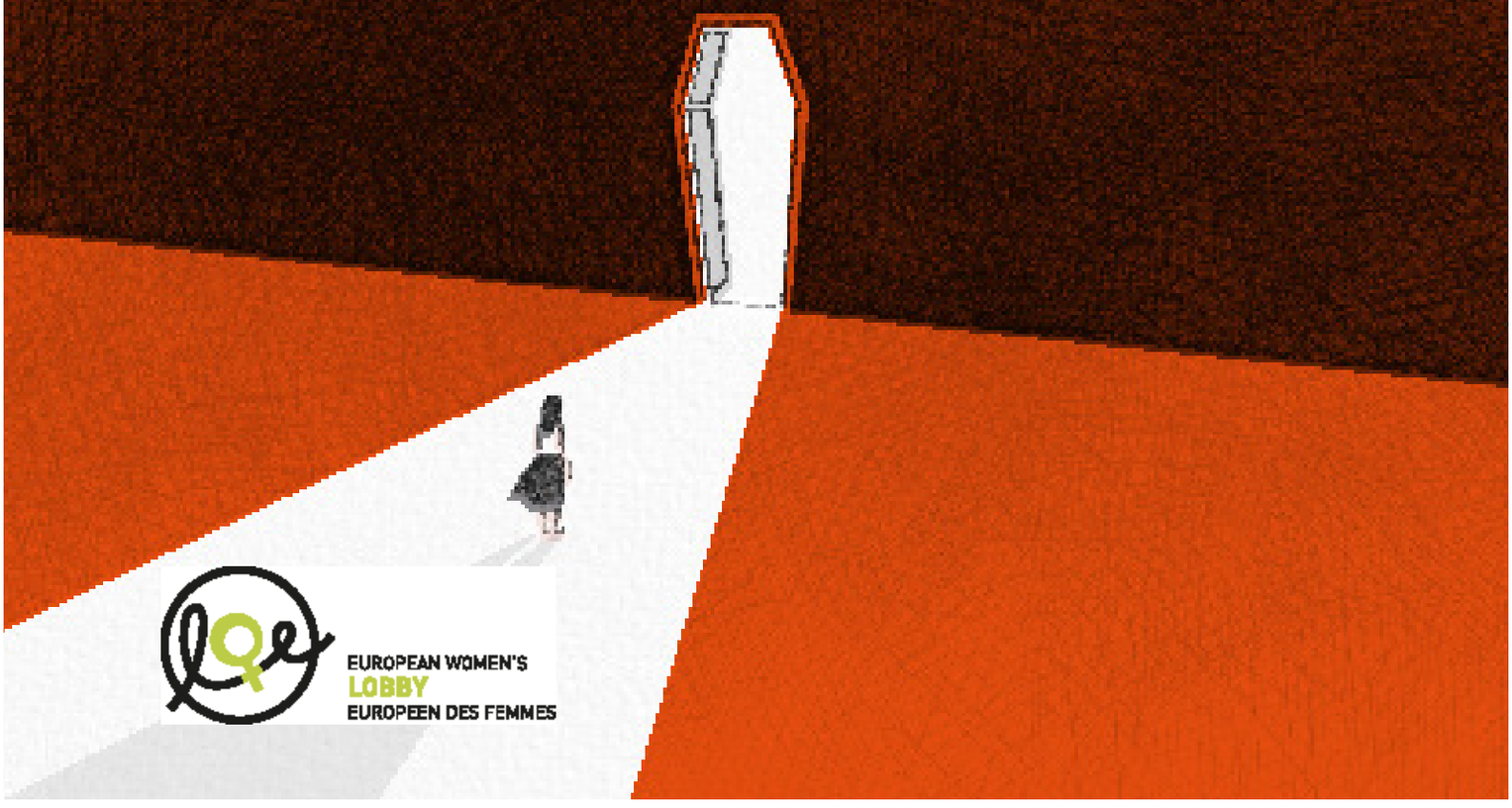
EWL SHADOW REPORT TO GREVIO'S BASELINE EVALUATION
OF THE EUROPEAN UNION'S IMPLEMENTATION
OF THE ISTANBUL CONVENTION

Focus

SYSTEMIC FAILURE TO PREVENT FEMICIDE



EUROPEAN WOMEN'S LOBBY
EUROPEEN DES FEMMES

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Researcher and author: Adele Philtjens, EWL Policy Officer
Publication: Gaïa Dufour, EWL Communication Officer
Design: Aurore de Boncourt
Contributors:
Enikő Pap, NANE Women's Rights Association, member organisation of the Hungarian Women's Lobby - Rugile Zmitreviciute and Ieva Saduike, Women's Issues Information Center, member organisation of the Lithuanian Women's Lobby - Laura Albu, Community Safety and Mediation Center, member organisation of the Romanian Women's Lobby - Lobby Europeo de Mujeres en España - Viviane Teitelbaum, European Center of the International Women Council
President: Dina Loghin
Secretary general: Mary Collins



The European Women's Lobby stands in solidarity with all women and girls across Europe and beyond — survivors, advocates, and defenders — working together to ensure that the high standards of the Istanbul Convention are upheld for everyone, everywhere.

European Women's Lobby, September 2026

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ACRONYMS

CERV	Citizens, Equality, Rights and Values (Programme)
DV	Domestic Violence
EC	European Commission
EIGE	European Institute for Gender Equality
EPO	European Protection Order EU: European Union
EWL	European Women's Lobby EU: European Union
GBV	Gender Based Violence
GREVIO	Group of Experts on Action against Violence against Women and Domestic Violence
IC	Istanbul Convention – Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence
TFEU	Treaty on the Functioning of the European Union
VAW Directive	Directive 2024/1385/EU of the European Parliament and of the Council of 14 May 2024 on combating violence against women and domestic violence

PART 1
FOUNDATION & METHODOLOGY



1 ABOUT THE EUROPEAN WOMEN'S LOBBY

The European Women's Lobby (EWL), the largest European network of women's rights organisations, welcomes the opportunity to submit this report to the Group of experts on action against violence against women and domestic violence (GREVIO) for the baseline evaluation of the European Union's implementation of the Istanbul Convention.

Founded in 1990, the EWL functions as an umbrella coalition representing the interests of over 2,000 organisations. It counts 42 direct member organisations, including 33 National Member Organisations across twenty-six EU Member States, four candidate countries (Moldova, North Macedonia, Serbia, and Turkey), and three other countries (Iceland, Norway, and the United Kingdom). Furthermore, the EWL includes 9 European-wide Member Organisations, specialised entities operating at regional and international levels in thematic fields such as migrant women's rights, disability, trade unions... Our membership structure provides both geographic depth and intersectional expertise, aiming to influence the general public and European Institutions in support of women's rights and equality between women and men.

The analysis presented in this submission draws on the extensive expertise of the EWL Observatory on Violence against Women. The Observatory brings together a group of experts from 30 organisations, appointed directly by our national and European member organisations. These include frontline practitioners, women's rights defenders, legal specialists, and activists, with outstanding experience and expertise in the different forms of violence against women. With more than 29 years of experience, the EWL Observatory plays a key role in identifying burning issues, formulating policy recommendations and monitoring progress towards a Europe free from male violence against women and girls.

2 EXECUTIVE SUMMARY

In 2026, Europe marks the 15th anniversary of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence, the Istanbul Convention (IC). This convention represents the first legally binding treaty, and the most comprehensive to date in Europe, that provides a holistic approach to address violence against women and girls.

The EU accession to the Istanbul Convention represented a transformative change in the European legal framework. For the first time, the EU is legally bound by international standards to combat gender-based violence (GBV) within its areas of competence. By acceding, the EU has committed to a set of comprehensive binding measures to address violence against women, including mandatory reporting on implementation and data collection. The ratification of the Convention plays a unifying role, ensuring that women across Europe are guaranteed a consistent baseline of protection no matter where they live.

In line with the Istanbul Convention standards, the EU has developed and reviewed its legal and political instruments to further recognise the gendered nature of violence. Central to this is the directive (2024/1385/EU)[1] on combating violence against women and domestic violence (VAW Directive), often described as the "little sister" of the Convention, supported by the forthcoming revision of the directive (2012/29/EU)[2] on the rights, support and protection of victims of crime (Victims' Rights Directive) and most recently the new Gender Equality Strategy 2026–2030.[3] The European Women's Lobby has been dedicated to monitoring and advocating for the effective implementation of these instruments at the EU level.

[1] Directive 2024/1385/EU of the European Parliament and of the Council of 14 May 2024 on combating violence against women and domestic violence
[2] Directive 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
[3] Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the Gender Equality Strategy 2026 – 2030.

By drawing on the empirical experience of the Observatory members, we highlight the gap between legislation and the reality of frontline protection.

This submission presents the EWL's analysis of the EU's implementation of the Istanbul Convention, with a specific focus on femicide, the most extreme form of violence against women and girls.[4] Any implementation that fails to result in a measurable decrease in femicide is an implementation that fails the Convention's obligations. The analysis is structured into four chapters:

1 The Lethal Data Gap;[5]
2 Institutional Duty and Due Diligence;
3 Protection and Cross-Border Safety;
4 The 2024 VAW Directive vs. The Istanbul Convention.

By examining evidence from Belgium, Hungary, Lithuania, Romania, and Spain, this report identifies **five systemic gaps** where EU-level obligations have not yet translated into effective protection for women on the ground. **These failures represent a critical disconnection between the Union's formal ratification of the Istanbul Convention and the daily reality of women at risk of lethal violence.**

Articles	Istanbul Convention	EU framework
Data Collection and research	*Article 11*	*Article 44* of the VAW Directive
Risk assessment and risk management	*Article 51*	*Article 16* of the VAW Directive *Article 22* of the Victims' Rights Directive
Emergency barring orders	*Article 52*	*Article 19* of the VAW Directive
Gender-based asylum claims	*Article 60*	*Article 33* of the VAW Directive
Financial resources	*Article 8*	*Article 25* of the VAW Directive

[4] GREVIO's general recommendations - Istanbul Convention Action against violence against women and domestic violence
[5] A lethal: able to cause or causing death; extremely dangerous

We call upon the GREVIO Monitoring Committee, to rigorously scrutinise these five gaps during its baseline evaluation visit in June 2026:

LETHAL DATA GAP

Article 11 IC
Article 44 VAW Directive

The absence of a harmonised EU-wide legal definition of femicide and mandatory, binding standards for disaggregated data collection renders gender-motivated killings statistically invisible. Femicide continues to be collapsed into general homicide or domestic violence categories across different Member States, making it impossible to accurately assess the scale of the problem, identify risk patterns or evaluate the effectiveness of prevention strategies.

LETHAL RISK ASSESSMENT GAP

Article 51 IC
Article 16 VAW Directive and
Article 22 Victims' Rights Directive

The EU framework fails to mandate standardised, comprehensive lethality risk assessment protocols that systematically integrate critical femicide indicators such as coercive control, post-separation escalation, stalking, digital violence, firearms access and previous patterns of abuse. Generalised "individual assessments" remain superficial, inconsistent and inadequately linked to protection measures across the Union, leaving high-risk cases undetected and unaddressed.

PROTECTION GAP: THE "PAPER SHIELD" EFFECT

Article 52 IC
Article 19 VAW Directive

Substantive differences in Member States' regulation of restraining/protection orders – such as the personal scope, conditions of/situations for issuing the orders, and substantive measures of protections – influence, often limit the applicability and framework of cross-border protection.
In addition, national protection orders and the European Protection Order (EPO) exist in law but remain largely ineffective in practice. They lack standardised mandatory enforcement mechanisms, real-time violation alerts, systematic monitoring, inter-agency information sharing and direct linkage to lethality risk assessments. The EPO in particular suffers from insufficient recognition, the complete absence of a centralised EU database and weak enforcement procedures. This systemic dysfunction turns life-saving safeguards into mere "paper

shields", leaving women exposed to continued violence and preventable femicide despite having sought formal protection.

CROSS-BORDER & INFORMATION-SHARING FAILURE

Article 60 IC
Article 25 VAW Directive

The "protection gap" for women moving across EU borders remains a critical risk. Protection orders issued in one Member State are not always seamlessly recognised or enforced in another, leaving survivors vulnerable when they flee to another country or jurisdiction. This gap is particularly acute for migrant women, who face heightened risks due to the absence of effective firewalls between protection services and immigration authorities. The EPO is undermined by the persistent legal and practical barriers to effective cross-border information sharing. These deficiencies create dangerous protection vacuums, allowing perpetrators to exploit jurisdictional boundaries through cross-border harassment and "legal stalking", while survivors lose effective protection upon relocation.

FINANCIAL & RESOURCE GAP

Article 8 IC
Article 25 VAW Directive

EU funding instruments such as the Citizens, Equality, Rights and Values (CERV) are overwhelmingly short-term, project-based and administratively burdensome, with heavy co-funding requirements, mandatory partnerships with public authorities and complex re-granting mechanisms that systematically favour larger, non-specialised organisations. This design structurally disadvantages specialist women-led feminist organisations and small grassroots services, leaving them with chronic underfunding, organisational instability, high staff turnover and burnout. These conditions severely undermine the continuity, quality and responsiveness of frontline shelters, women's specialist service providers and the long-term femicide-prevention work required by the Istanbul Convention.

The report concludes with a series of actionable outputs designed to translate policy into practice. We present strategic recommendations to the European Commission, alongside priority inquiries for the GREVIO monitoring committee's evaluation visit in June 2026.

3 METHODOLOGY

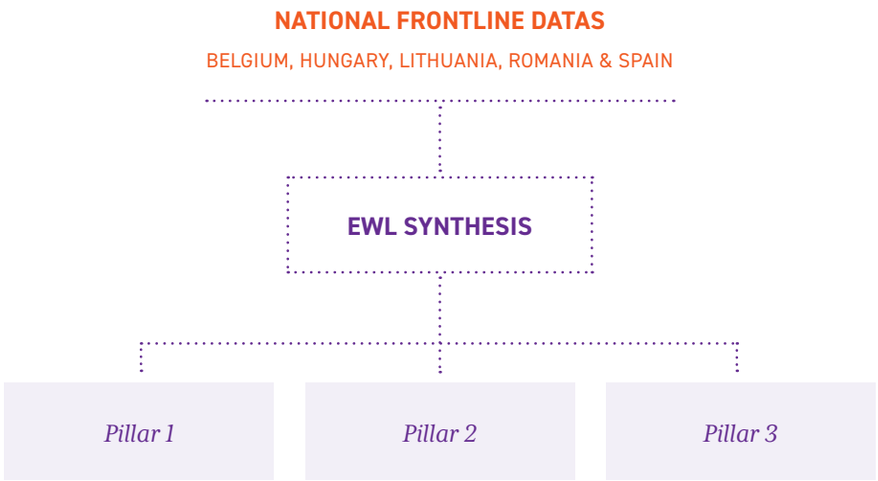
This analysis is strictly confined to the European Union's exercise of its competences under the Istanbul Convention. It evaluates the interaction between the Union's legislative framework and national enforcement mechanisms, examining the extent to which supranational obligations are effectively translated into tangible protections for victims of violence against women at the Member State level, or where such translation falls short.

The methodology of this shadow report follows a bottom-up approach. Rather than treating national data as isolated incidents, we have integrated frontline realities from across the Union into a cohesive EU-wide narrative. Our objective is to demonstrate that recurring failures at the local level are symptoms of systemic gaps in EU law and the Union's institutional duty to protect.

This report is the result of an in-depth consultative process conducted with experts from the **European Women's Lobby Observatory**. The evidence is drawn from five EU Member States: **Belgium, Hungary, Lithuania, Romania, and Spain**. This selection provides a strategic overview of the EU, including countries that have pioneered specialised legislation alongside those that have yet to fully align their national frameworks with the Istanbul Convention.

Primary data were gathered through a structured questionnaire designed to identify implementation gaps within the EU's supranational competences.[6]

[6] See appendix A – National Evidence Summaries



The findings are categorised into three areas:

Pillar 1: Data and Visibility Gap;
Pillar 2: Legal and Protection Gap;
Pillar 3: The Funding and Resource Gap.

To ground our legal analysis in lived reality, national experts provided detailed case analyses of femicides. We utilise **anonymised case studies** of femicides that occurred within the last 24 months to illustrate the "Implementation Gap." These cases serve as primary evidence of where the Union's "safety net" fails to uphold the standards of the Istanbul Convention.[7]

[7] See appendix B – Detailed Femicide Case Analysis

4 SCOPE OF THE REPORT

While all 27 EU Member States have signed the Convention, five have yet to ratify it at a national level.[8] Consequently, the European Union's accession to the Convention triggers a binding legal obligation within the scope of its supranational competences.

The accession of the European Union to the Istanbul Convention, which entered into force on 1 October 2023, constitutes a significant institutional commitment to the fundamental values of equality and non-discrimination and to the prevention and combating of violence against women and domestic violence. The EU has acceded to the Convention within the scope of its supranational competences, namely in matters related to the institutions and public administration of the Union[9] and matters related to judicial cooperation in criminal matters, asylum and non-refoulement.[10]

Judicial Cooperation in Criminal Matters: The Union's role in judicial cooperation is the primary mechanism for ensuring that justice does not stop at the border. Through its accession to the Istanbul Convention, the EU is now legally accountable for closing the protection vacuum that arises when survivors of violence move across the Schengen Area. This responsibility rests on two key Treaty provisions:

- **Mutual Recognition of judgments and decisions** (Article 82 TFEU),[11] which requires the EU to ensure that protection orders travel as freely as the citizens they protect.

- **The establishment of minimum rules** concerning the definition of criminal offences and sanctions (Article 83 TFEU),[12] which empowers the EU to harmonise standards for particularly serious forms of crime.

[8] Status of ratifications on 29.04.2026: AT(2013); BE(2016); CY(2017); DE(2017); DK(2014); IE(2019); EL(2018); ES(2014); EE(2017); FI(2015); FR(2014); HR(2018); IT(2013); LU(2018); MT(2014); NL(2015); PL(2015); PT(2013); RO(2016); SI(2015); SV(2014); LV(2024).
[9] Council Decision (EU) 2023/1075.
[10] Council Decision (EU) 2023/1076.
[11] Treaty on the Functioning of the European Union [2012] OJ C 326
12 Ibid

EU institutions and public administration: under Article 8 TFEU,[13] the Union is bound by a positive obligation to mainstream gender equality across all its policies and actions.

Since acceding to the Istanbul Convention, the EU's internal governance and public administration are no longer matters of policy discretion but of legal accountability. This includes closing the persistent "visibility gap" in gender-based violence data collection, ensuring adequate resourcing through the Citizens, Equality, Rights and Values (CERV) programme (measured by its accessibility to grassroots organisations rather than by budget volume alone), and applying Istanbul Convention standards to its own personnel and internal regulations.

Asylum and Non-Refoulement: under Article 78 TFEU,[14] the European Union holds a positive obligation to ensure that its Common European Asylum System is inherently protective rather than merely administrative. Following accession to the Istanbul Convention, the EU is legally accountable for responding to the gendered impact of its border and migration policies. This entails a supranational duty to recognise gender-based violence as a form of persecution under the 1951 Refugee Convention, to guarantee gender-sensitive asylum procedures, and to mandate adequate reception conditions, including secure, gender-segregated housing in EU-funded reception centres, in order to prevent secondary victimisation and ensure the safety of women and girls throughout the asylum process.

13 Ibid
14 Ibid

PART 2
THEMATIC ANALYSIS & EVIDENCE



Article 1

Purposes of the Convention establishes that the Convention aims to protect women against all forms of violence and to contribute to the elimination of all forms of discrimination against women. In this context, femicide, the worst expression of violence against women, directly falls under the scope of the Convention. Although the term "femicide" does not appear explicitly in the Istanbul Convention, the concept is fundamentally embedded in its definition of gender-based violence as violence directed against a woman because she is a woman. This interpretation is consistently reinforced by GREVIO, which has repeatedly reminded States Parties that implementation of the Convention remains incomplete unless the prevention of femicide is treated as a core strategic priority.

Article 11

Data Collection and Research requires parties to collect disaggregated data at regular intervals on all forms of violence covered by the Convention. The minimum requirement is that the data on victims and perpetrators should be disaggregated by sex, age, type of violence, relationship of the perpetrator to the victim, geographic allocation, as well as other factors.

1 THE LETHAL DATA GAP

Article 11 and 1

1.1 Failure of Harmonisation

Article 11 on Data Collection and Research requires parties to collect disaggregated data at regular intervals on all forms of violence covered by the Convention. The minimum requirement is that the data on victims and perpetrators should be disaggregated by sex, age, type of violence, relationship of the perpetrator to the victim, geographic allocation, as well as "other factors" such as disability, migration status, and ethnicity.[16] The article also requires that the collected data and information be made publicly available and shared with GREVIO.

In contrast, Article 44 of the VAW Directive falls short of these standards. While it requires Member States to establish systems for recording, analysing and disseminating administrative data on violence against women and domestic violence, and mandates cooperation with the European Institute for Gender Equality (EIGE) on common standards for counting units, rules and offence classification, it does not impose a fully harmonised, mandatory and uniform legal framework.[17] It lacks enforceable minimum disaggregation across all sectors, and a single EU-wide definition of femicide. Implementation, therefore, remains dependent on voluntary alignment by Member States.

Member States have yet to comprehensively address all forms of violence covered by the Istanbul Convention, including femicide. Current EU statistical methodologies similarly fail to capture the distinctly gendered nature of femicide. In the absence of standardised key indicators, it remains impossible to identify femicide with any accuracy, to map underlying risk patterns, or to ascertain whether early warning signs were overlooked by the competent authorities. These shortcomings represent a series of missed opportunities to prevent lethal violence against women.

National differences in data collection further undermine comparability across the Union. Evidence shows that Spain and Belgium have developed relatively advanced data systems that attempt to track femicides. In contrast, Hungary, Lithuania continue to classify such cases under broad and neutral categories of homicide or domestic violence. Only Romania changed this pattern in April 2026 by adopting

[15] Council of Europe Convention on preventing and combating violence against women and domestic violence
[16] Explanatory Report to the Council of Europe Convention on preventing and combating violence against women and domestic violence, Art. 76.
[17] Directive 2024/1385/EU of the European Parliament and of the Council of 14 May 2024 on combating violence against women and domestic violence

a femicide law which will hopefully change the previous neutral classification. Because Article 44 of the VAW Directive imposes no uniform, binding standard for recording femicide, EIGE and Eurostat statistics are either derived from general homicide data or limited to killings within intimate-partner or family contexts. Consequently, many femicides, most notably those committed by strangers and indirect femicides (for example, suicides linked to prolonged abuse), remain invisible in official EU-level statistics.

Finally, data from civil justice, healthcare, social protection, migration, and specialist support services remain fragmented, inconsistent or altogether underdeveloped. This narrow reliance on criminal-justice data alone fails to reflect the full scope and cumulative impact of violence against women.

1.2 The Terminology Argument

In its 2025 Baseline Report to GREVIO[18], the European Union positions the VAW Directive as the cornerstone of its commitment to the Istanbul Convention. Relying on Article 83(1) TFEU, the VAW Directive harmonises minimum rules for certain offences in the areas of 'sexual exploitation of women and children' and 'computer crime': female genital mutilation (Art. 3), forced marriage (Art. 4), and various forms of cyber-violence (Arts. 5–8).[19] The explicit omission of femicide from this legislative core constitutes a critical gap that significantly weakens the Directive's overall effectiveness and undermines the EU's ability to address the most lethal manifestation of gender-based violence in a comprehensive manner. Although EIGE has proposed common definitions and indicators for femicide in the police and justice sectors, these remain strictly voluntary. The absence of a binding EU-level term gives Member States political power to refrain from updating their national criminal codes or data systems.

This legislative vacuum creates a fragmented landscape where 27 different legal lenses produce incomparable statistics, resulting in a **lethal data gap** for women across Europe. In Belgium, the landmark law adopted in June 2023, establishes the legal terminology and mandatory state-level monitoring. This legislation, born from feminist advocacy, obliges the state to publish annual disaggregated data. Similarly, Spain demonstrates advanced institutionalisation; while legislation often refers to 'fatal victims of gender violence 'or' macho murders, 'the official Statistical Portal maintains a dedicated section for 'Feminicides,' allowing for targeted policy responses. Conversely, in the majority of Member States, the term lacks official recognition. In Hungary, state institutions persist in recording femicides under neutral categories of homicide, leaving civil society organisations like NANE Association and Patent Association to perform the state's duty of naming and monitoring these crimes. In other states, such as Lithuania, the judicial system records killings that occur in a "close environment," which means incidents taking place within an environment consisting of persons who are or have been linked by marriage, partnership, affinity, kinship, or other close ties, as well as persons who live together and manage a shared household. In Romania, after massive killings

[18] Baseline Report by the European Union on measures giving effect to the provisions of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (the "Istanbul Convention" or the "Convention").
[19] Directive (EU) 2024/1385 of the European Parliament and of the Council of 14 May 2024 on combating violence against women and domestic violence.



LEGAL RECOGNITION OF FEMICIDE IN EU MEMBER STATES: A COMPARATIVE OVERVIEW (2026)

(63 women) in 2025, femicide law was adopted in April 2026, with legal definition for femicide defined as the intentional killing of a woman or girl, committed on gender grounds.

The EU framework is functionally incomplete because it refuses to name femicide.
By declining to recognise femicide as a distinct criminal reality, the Union has failed to create an enforcement mechanism that compels Member States to address these killings as structural, gender-based crimes. To implement the Istanbul Convention in good faith, the EU must recognise femicide as an urgent priority.

1.3 The Evidence Box

The Istanbul Convention defines violence against women as a structural phenomenon rooted in historically unequal power relations between women and men. Yet recording standards in the majority of Member States continue to treat such violence as a private, domestic occurrence.
The evidence below demonstrates how these narrow definitions lead to the systematic undercounting of gender-based killings:

IN LITHUANIA, the official statistical system records killings only when they occur in a "close environment" ("artimoje aplinkoje"), thereby systematically excluding stranger and unknown-perpetrator femicides. While national statistics reported 14 women killed in 2024 and 4 in 2025, media monitoring documented at least three additional women killed outside domestic-violence settings or by unknown perpetrators each year.

IN BELGIUM, despite the *2023 #StopFéminicide* Law, Belgium lacks a fully harmonised official femicide monitoring system. Femicides are mainly counted by the NGO StopFémicide using media reports, including intimate partner/family-related killings and some indirect femicides. Police and justice services record the relationship to the perpetrator (partner or ex-partner) but do not systematically register the gender motive.

IN HUNGARY, no official marker exists for femicide; the state fails to identify femicide cases as such. The official statistical system – of the police and prosecution service – records for all crimes the sex of the victim and of the perpetrator and their relationship. However, data is recorded only after closing certain stages of the criminal procedure, and relevant data are not published proactively. Civil-society organisations, namely NANE and Patent Associations, and an online media portal called Mérce, collect and provide visibility for femicide cases.

IN SPAIN, the country stands as a leading benchmark for compliance with the Istanbul Convention. Its national police and judiciary officially record both the "relationship to the killer" and the "gendered motive." This dual approach enables authorities to distinguish between intimate-partner and non-intimate femicides and to assess the effectiveness of protection measures.

IN ROMANIA, following the massive number of femicides in 2024 and 2025, the Law on the Prevention and Combating of Femicide was officially adopted in the spring of 2026 and promulgated on April 26, 2026. This law represents a legislative premiere in Romania, defining for the first time the murder of a woman on gender grounds as a specific crime.
Most important provisions:

- **Legal definition:** Femicide is defined as the intentional killing of a woman or girl, committed on gender grounds. The law classifies the phenomenon into three types:
  Intimate femicide:
  committed by a partner or former partner/family member.
  Non-intimate femicide:
  committed by an unknown person or without a close relationship.
  Indirect femicide:
  death resulting from harmful practices or serious injuries.

- **Tougher penalties:** The law introduces tougher penalties for gender-based crimes, with penalties that can reach up to life imprisonment in aggravated cases.

- **National Monitoring:** State institutions are required to collect data and publish detailed annual reports on victims and perpetrators to better understand and combat the phenomenon.

- **Prevention and education measures:** The law provides for education programs and expanded protection measures for women at risk.

The bill benefited from massive cross-party support, being adopted by Parliament with an overwhelming majority in March 2026.

	Recording Scope	2024 STATS	2025 STATS	Key data gaps & structural barriers
SPAIN	Official data provided by Delegación del Gobierno contra la Violencia de Género "Mujeres" portal : • murders by current/former partner, • murders of minors in gender-based violence context, • murders of women outside intimate-partner context	**49** Femicides (official)	**48** Femicides (official)	**Best practice:** systematically records gender motive and relationship to perpetrator; enables targeted risk analysis.
BELGIUM	*2023 #StopFéminicide* Law obliges annual official reporting. Framework covers intimate, non-intimate, and indirect femicides (e.g. suicide resulting from coercive control). However, no fully harmonised official count exists yet.	**26** Femicides (NGO/Media)	**27** Femicides and 1 Indirect Femicide (NGO/Media)	Gender motive is not yet systematically recorded in official systems. Continued heavy reliance on NGO and media monitoring.
LITHUANIA	Official statistics limited to women killed in "domestic violence" settings.	**14** Femicides (official) + at least 3 killed outside domestic violence or by unknown perpetrators (Media)	**4** Femicides (official) + at least 3 women killed outside domestic violence (Media)	Gender motive is not systematically recorded. Media reports at least 3 additional cases in 2024 and 2025 involving strangers or unknown perpetrators outside domestic settings.
ROMANIA	No official statistics on femicide exist. VIF Network and ROWL compiles annual data based on police and media reports (partner/ex-partner and family-member killings).	**43** Femicides (NGO/Media)	**63** Femicides (NGO/Media)	Gender motive is not systematically recorded. Media reports at least 3 additional cases in 2024 and 2025 involving strangers or unknown perpetrators outside domestic settings.
HUNGARY	No official statistics on femicide exist. NANE Women's Rights Association compiles data annually based on police and media reports (partner/ex-partner and family-member killings).	**16** (NANE)	**12** (NANE)	No gender motive is recorded. Complete absence of dedicated official data and gender-motive recording. (However, official data exist and can be requested on crimes disaggregated by the sex of the victim and of the perpetrator and their relationship.) Civil society performs the State's monitoring role.

Article 5

State obligations and due diligence imposes a clear positive obligation of due diligence on States Parties to refrain from committing violence against women through State action or omission and to take proactive, effective measures to prevent, investigate, and punish violence perpetrated by non-State actors.

2 INSTITUTION DUTY & DUE DILIGENCE

Article 5

2.1 Systemic Neglect: Analysis of the EU's failure to mandate "Lethality Risk Assessments" for all relevant authorities

Article 51 of the Istanbul Convention requires that all relevant authorities systematically assess the lethality risk, the seriousness of the situation, and the risk of repeated violence "at every stage" in order to manage risk and deliver coordinated safety measures. This assessment must explicitly take into account the perpetrator's access to firearms and patterns of coercive control. As interpreted by GREVIO and reflected in the Explanatory Report of the Convention, effective implementation demands the integration of patterns of coercive control, post-separation escalation, and other femicide-specific indicators.[20]

While Article 16 of the VAW Directive[21] and Article 22 of the Victims' Rights Directive[22] require individual assessments of victims' protection needs and vulnerability to secondary victimisation, respectively, the EU legal framework fails to mandate a binding, harmonised lethality risk-assessment protocol as expressly required by Article 51 of the Istanbul Convention. Neither instrument imposes a standardised methodology, mandatory core indicators (coercive control, prior complaints, strangulation, digital surveillance, firearm access), nor real-time multi-agency coordination. EIGE's 2019 Guide to Risk Assessment remains entirely voluntary.[23]

This structural omission leaves prevention dependent on discretionary national practices rather than Union-wide standards. When combined with the "silo effect" between police, prosecutors, the judiciary, and support services, marked by fragmented databases, protocols, and working cultures, and the absence of mandatory real-time information sharing, high-risk cases remain largely invisible and effectively unprotected. Member States remain unable to consistently identify and manage lethal risk because the EU has not translated

[20] Explanatory Report to the Council of Europe Convention on preventing and combating violence against women and domestic violence
[21] Directive (EU) 2024/1385 of the European Parliament and of the Council of 14 May 2024 on combating violence against women and domestic violence
[22] Directive 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
[23] Gender-based violence guide of EIGE: "A guide to risk assessment and risk management of intimate partner violence against women for police"

the due diligence obligation under Article 5 IC into operational, enforceable requirements.

Across all five Member States, Belgium, Spain, Lithuania, Romania and Hungary authorities repeatedly demonstrate a lack of adequate risk assessment, underestimation of post-separation danger, and failure to monitor protection orders. The persistence of femicide is therefore not the result of isolated tragedies or lack of knowledge, but the predictable outcome of the EU's failure to impose binding operational standards for lethality risk assessment as required by Article 51 of the Istanbul Convention.

2.2 Secondary Victimisation: How EU-level procedures (e.g. border screening) increase risk for survivors

Article 60 of the Istanbul Convention requires that gender-based violence against women be recognised as a form of persecution for the purposes of refugee status and as a form of serious harm giving rise to complementary protection. These obligations must be supported by gender-sensitive asylum procedures and reception conditions.[24] Although the EU legal framework contains certain provisions, notably Article 33 of the VAW Directive, these remain very general.[25] They leave Member States to determine for themselves the practical arrangements for victim-hearing procedures and the application of evidentiary safeguards.

This results in highly uneven protection across the Union and creates persistent opportunities for secondary victimisation. In addition, structural deficiencies in EU migration and border-control procedures actively heighten these risks for migrant, non-national and third-country national survivors. The New Pact on Migration and Asylum,[26] adopted in May 2024 prioritises a security-first approach through mandatory rapid screening, accelerated border procedures, expanded Eurodac biometric database and Frontex operations. The persistent absence of mandatory "firewalls" between immigration enforcement and victim-protection services allows data collected during border screening, asylum interviews or routine police checks to be shared with immigration authorities without adequate confidentiality protections.

This creates a structural "silence trap", particularly for migrant women. Rather than being recognised as rights-holders entitled to protection under the VAW Directive and the Istanbul Convention, they are routinely viewed through a security and migration-control lens. In rushed, high-pressure screening and asylum procedures, survivors of gender-based violence and trafficking are often compelled to recount their trauma without guaranteed access to qualified interpreters, trauma-informed interviewing protocols, or reliable confidentiality assurances. The well-founded fear that disclosing intimate-partner violence, patterns of coercive control, or lethal threats could trigger deportation, revocation of residence status, or barriers to family

[24] Council of Europe Convention on preventing and combating violence against women and domestic violence
[25] Directive (EU)2024/1385 of the European Parliament and of the Council of 14 May 2024 on combating violence against women and domestic violence
[26] Regulation (EU) 2024/1347 of the European Parliament and of the Council of 14 May 2024 on standards for the qualification of third-country nationals or stateless persons as beneficiaries of international protection, for a uniform status for refugees or for persons eligible for subsidiary protection and for the content of theprotection granted, amending Council Directive 2003/109/EC and repealing Directive 2011/95/EU of the European Parliament and of the Council

reunification strongly discourages reporting. Consequently, many women remain invisible to protection systems until the violence escalates to a potentially lethal level.

A further critical gap is the complete absence of systematic and harmonised, trauma-informed training for frontline actors, such as border guards and Frontex personnel. EU law does not require these frontline officials, who conduct the initial and often decisive screening interviews, to receive standardised training on recognising indicators of gender-based violence, coercive control, or vulnerability to lethal risk. As a result, questioning is frequently aggressive, adversarial and insensitive, replicating the tactics used by abusers and deepening re-traumatisation.

Evidence from EWL member organisations confirms the systemic failures. In a case from Belgium, a migrant woman did not report repeated violence due to fear related to residence status, which contributed to femicide.

This constitutes a clear breach of the due diligence standard under Article 5 of the Istanbul Convention. The EU and its Member States cannot claim to fulfil their positive obligations while border-screening and data-sharing rules function as de facto barriers to protection.

Evidence case: # HUNGARY

A CASE DOCUMENTED BY HUNGARIAN CIVIL SOCIETY ORGANISATIONS ILLUSTRATES THE FATAL CONSEQUENCES OF SYSTEMIC FAILURES IN THE PROTECTION OF VICTIMS OF GENDER-BASED VIOLENCE.

In January 2025, a woman was killed in her own flat by her former husband, who then set the apartment on fire in an apparent attempt to conceal the crime. The police initially treated the incident as an accident. Only following sustained pressure and mobilisation by the victim's friends, as well as the involvement of the Patent Association that had provided legal aid and representation to the victim, was a homicide investigation initiated.

The victim and the perpetrator had previously been married and later divorced. During their relationship, the woman lived in fear of her husband, who subjected her to repeated acts of violence, including one incident of choking, and engaged in psychological abuse by manipulating their children. The perpetrator possessed firearms, which he kept in the shared flat. Multiple institutions had knowledge of the victim's situation and her fears, including the guardianship authority, the children's school, and the Embassy of Japan (the victim was a Japanese national).

After the separation, the perpetrator lived in the Netherlands and returned to Hungary every 2-3 months to exercise visitation rights with their common children. From the summer of 2024 onwards, the victim repeatedly sought assistance from the police, reporting various acts committed by her former husband. In October 2024, she explicitly reported that he had threatened her life. The police refused to register the complaint, failed to initiate an investigation, and did not carry out any form of risk assessment, including a lethality assessment. When attempting to file reports, the victim encountered degrading and victim-blaming treatment by law enforcement. At one point, when she attempted to change the lock on the flat out of fear, the police warned her that preventing the perpetrator from entering could constitute a criminal offence, as his registered address remained the same.

Despite a clear pattern of escalating violence, the presence of firearms, and repeated attempts by the victim to seek protection, no formal risk assessment was conducted by the police or any other relevant authority.

THIS CASE DEMONSTRATES A PROFOUND FAILURE OF THE STATE'S POSITIVE OBLIGATION TO PROTECT.

The police, in particular, disregarded the victim's repeated requests for help and failed to act within the framework of criminal procedure, thereby undermining the enforcement of the right to protection. Other institutions with knowledge of the situation similarly failed to initiate or implement preventive or protective measures. The result was a preventable killing that exposes systemic gaps in risk identification, risk management, safety planning, inter-institutional coordination, and victim protection.

Article 18

General obligations

States Parties must protect all victims from further violence through effective cooperation among all relevant agencies, including the judiciary, prosecutors, police, local authorities and NGOs. Protection must be based on a gendered understanding of violence and an integrated approach that considers the victim, the perpetrator, the children and their wider environment, with the victim's safety at the centre. Most femicides are preceded by known patterns of violence, and many victims have already been in contact with the police, courts or support services. When institutions act in isolation, or fail to see the victim's situation as a whole, warning signs are missed and protection fails.

Article 28

Reporting by professionals

States Parties must ensure that confidentiality rules do not prevent professionals from reporting to the competent authorities when they have reasonable grounds to believe that a serious act of violence has been committed and that further serious acts are to be expected. It makes clear that professional secrecy must not become an obstacle to protecting a woman's life. In the context of femicide prevention, timely reporting by professionals can be decisive in triggering protective measures before violence escalates to a killing.

3 PROTECTION & CROSS-BORDER SAFETY

Article 18 – 28

3.1 The failure of the European Protection Order (EPO) on why protection orders don't cross borders effectively

Article 52 of the Istanbul Convention establishes the national obligation to issue emergency barring orders.[27] At the EU level, this obligation is implemented through Article 19 of the VAW Directive, which requires Member States to ensure that, in situations of immediate danger for the victim or their dependants, competent authorities are granted the power to issue, without undue delay, emergency barring orders.[28] In addition, to guarantee effective cross-border protection, the EU has established legal instruments for the mutual recognition of protection measures, notably the regulation 606/2012/EU on the mutual recognition of protection measures in civil matters[29] and the directive 2011/99/EU on the European Protection Order,[30] which together establish a framework for cross-border recognition and enforcement of protection measures across Member States.

While these instruments represent a formal commitment to the free movement of protection for victims, EWL Observatory members reveal a persistent and structural failure in their practical application, leaving victims exposed when they move, flee or seek safety. In reality, they function as another "papershield": formally available on paper but operationally ineffective, especially in cross-border contexts.

In Lithuania, the EPO has very limited recognition and practical application. National authorities continue to rely almost exclusively on the domestic protection order introduced in July 2023 (valid for only 15 days). There is no publicly available evidence of EPOs being issued, recognised or enforced in cases involving cross-border elements, and no specialised women's shelters or femicide-prevention programmes exist in the country.[31]

Hungary illustrates an even more structural failure. While women's rights NGOs experience that the EPO has very limited recognition and practical application, fundamental problems exist

[27] Council of Europe Convention on preventing and combating violence against women and domestic violence
[28] Directive (EU) 2024/1385 of the European Parliament and of the Council of 14 May 2024 on combating violence against women and domestic violence
[29] Regulation (EU) No606/2013 of the European Parliament and of the Council of 12 June 2013 on mutual recognition of protection measures in civil matters
[30] Directive 2011/99/EU of the European Parliament and of the Council of 13 December 2011 on the European protection order
[31] See appendix A – National Evidence Summaries.

with the national scope restraining regulation in paper and practice as well. The Act on restraining orders excludes entire categories of victims, who do not meet the legislative definition of "relatives" such as certain (ex)-intimate partners, refused suitors/stalkers, or victims' dependants. The (temporary) preventive restraining orders is used in a small number of cases, with no related risk assessment, risk management and safety planning. Yet even when restraining orders are issued, they repeatedly fail in practice. NANE Women's Rights Association have documented a femicide case in which courts rejected applications for restraining orders despite prior threats and the perpetrator's previous imprisonment. In another instance, a restraining order was breached on the very day it was issued, resulting later in the femicide of the woman concerned and the murder of her child.[32] Because Hungary has not ratified the Istanbul Convention, certain victims fall outside the scope of national protection as prescribed by the Convention. Paradoxically, the EU EPO framework can offer greater protection to victims temporarily residing in Hungary coming from other EU Member States – that comply with the Convention's requirements – than to Hungarian nationals in identical situations.

In Belgium and Spain, the "paper shield" phenomenon is equally evident at the national level and inevitably undermines the cross-border dimension. Belgian protection measures suffer from inconsistent enforcement, inadequate monitoring and systematic underestimation of lethal risks such as post-separation risk and coercive control. In Spain, despite the existence of the VioGen system, numerous femicide victims in 2024–2026 had active complaints or protection orders, several local police forces still do not participate in the system, and cross-border data exchange remains invisible in official statistics. In 2024, for example, Spanish data showed that 16 victims had filed prior complaints and 9 had active protection orders in place at the time of their killing.[33]

In practice, the European Protection Order adds little value if and where national protection orders already fail to deliver effective safeguards. Systemic weaknesses in issuance and enforcement render the EU mutual-recognition mechanism largely meaningless. Across the Union, EPOs remain severely underused, primarily because of insufficient awareness among victims and professionals. Also, persistent divergences in the transposition and application of national orders, particularly regarding their nature, duration and scope, continue to obstruct mutual recognition. These implementation gaps undermine the coherence and effectiveness of the EU framework in preventing femicide and protecting women from gender-based violence.

3.2 Victim Support Funding: Critical evaluation of the CERV program's accessibility for grassroots femicide-prevention NGOs

Article 8 of the Istanbul Convention obliges Parties to allocate adequate financial resources to policies, programmes and measures aimed at preventing and combating violence against

[32] Ibid
[33] Ibid

women, and to support specialist services provided by civil society organisations.
In its reporting to GREVIO, the European Union emphasises the Citizens, Equality, Rights and Values (CERV) Programme (2021–2027), particularly its Daphne strand, which receives approximately EUR 27 million annually (around 15% of the CERV budget), with the 2025 call amounting to EUR 23 million.[34] Funding is primarily delivered through project grants to civil society organisations and public authorities.

While these allocations demonstrate a formal financial commitment, evidence submitted by national women's rights organisations reveals a persistent and structural failure to translate EU resources into sustainable, accessible support for grassroots femicide prevention work.

In recent years, the CERV Programme has become one of the few EU instruments offering unrestricted core and long-term funding to civil society organisations through operating grants. Nevertheless, the design and implementation of larger EU funding programmes have increasingly favoured re-granting mechanisms managed by bigger, non-specialised civil society organisations, umbrella networks and non-profit entities. These organisations benefit from superior administrative capacity, professional grant-writing resources, and the ability to meet co-funding obligations, heavy reporting requirements and mandatory partnerships with public authorities. As a result, independent grassroots women's organisations, particularly small and medium-sized specialist services providing frontline support to victims of gender-based violence, are systematically crowded out of direct access to EU resources.

As a direct consequence of their limited access to CERV operating grants, many specialist women's organisations are forced to rely on precarious, short-term, project-based funding that fails to cover core operational costs.
This chronic underfunding is compounded by persistent gaps in administrative capacity, high staff turnover, burnout and organisational instability. These weaknesses directly undermine the quality, continuity and responsiveness of frontline support services. Moreover, the overwhelming emphasis on project-based and results-oriented funding models is fundamentally misaligned with the sustained, continuous interventions required for effective lethality risk assessment, monitoring and protection work to prevent femicide.

Current re-granting models privilege administrative capacity over demonstrated gender-equality expertise. They concentrate resources among larger organisations while systematically underfunding the very feminist civil society organisations that deliver the majority of day-to-day, life-saving support to victims. These structural and political barriers raise serious concerns regarding the adequacy, targeting, accessibility and long-term sustainability of EU financial support for civil society under Article 8 of the Istanbul Convention.[35]

[34] Baseline Report by the European Union on measures giving effect to the provisions of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (the "Istanbul Convention" or the "Convention").
[35] Council of Europe Convention on preventing and combating violence against women and domestic violence

Evidence case: ROMANIA

A CASE DOCUMENTED BY ROMANIAN WOMEN'S RIGHTS ORGANISATIONS ILLUSTRATES THE LETHAL CONSEQUENCES OF SYSTEMIC FAILURES IN THE PROTECTION OF VICTIMS OF GENDER-BASED VIOLENCE.

In May 2025, a pregnant woman was shot dead on a public street in front of her young child. The perpetrator was her former partner. The relationship had followed a classic lethality trajectory. Several years earlier, a protection order had been issued against the perpetrator in one county following repeated threats. The victim later relocated to a different county to escape him. In the intervening years, she and her new partner filed multiple criminal complaints for ongoing harassment and death threats. In the months preceding the murder, she explicitly informed the police that the perpetrator possessed firearms. Despite this multi-year pattern of documented risk and a prior protection order, the perpetrator remained at liberty and on 31 May 2025 carried out the killing of the pregnant woman in front of her child.

This case demonstrates the lethal consequences of the "information silo" within the same country, simply between counties. Under Article 5 of the Istanbul Convention, the Romanian authorities failed in their positive obligation to protect the victim's right to life. Although a protection order had previously been issued, the victim's relocation to a different county effectively resulted in a "reset" of her documented risk level. Furthermore, despite explicit warnings regarding the perpetrator's access to firearms, no seizure was undertaken.

At the EU level, the case exposes deeper structural gaps. The EU Firearms Directive (2021/555)[36] contains no mandatory "lethality flag" that would automatically trigger the seizure of weapons, whether legal or illegal, upon a domestic-violence report. The Victims' Rights Directive (2012/29/EU, Article 22)[37] requires an individual assessment of protection needs, yet in practice these assessments frequently remain superficial box-ticking exercises focused on the immediate threat rather than the perpetrator's history and access to firearms.

[36] Directive (EU) 2021/555 of the European Parliament and of the Council of 24 March 2021 on control of the acquisition and possession of weapons (codification)
[37] Directive 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

4 THE 2024 VAW DIRECTIVE VS. THE ISTANBUL CONVENTION

Article 29 – 48

4.1 The "Consent" Gap: How the EU's failure to harmonise the definition of rape affects femicide risk assessment

The 2024 VAW Directive omitted the proposed harmonised consent-based definition of rape, originally Art. 5, following opposition from several Member States citing competence issues, regarding the legal basis in Article 83 TFEU. This directly contravenes Istanbul Convention Article 36 and creates a critical blind spot in femicide prevention.

Sexual violence within coercive-control patterns is a well-documented femicide risk factor. When national criminal law still requires proof of "force" rather than absence of freely given consent, prior sexual coercion is systematically under-recorded and under-weighted in risk assessments. Victims whose histories include non-forcible but coercive sexual violence receive lower risk classification, delaying or preventing the activation of protection measures. In Belgium and Spain, consent-based reforms have advanced at the national level; in Lithuania and Hungary, the gap remains wider.

The Directive's omission of a harmonised consent-based definition of rape creates a double injustice: it prevents comparable, disaggregated data on sexual violence as a femicide precursor while leaving national protection systems with inconsistent legal tools, so that warning signs visible under the Istanbul Convention remain invisible or downgraded under national law. This violates the Convention's requirement for an effective, comprehensive and coordinated approach.

4.2 Digital Femicide: The missing link between cyber-stalking and physical homicide in the EU

Technology-facilitated abuse, including cyber-stalking, stalkerware, GPS tracking, digital surveillance and online harassment, now constitutes a direct and escalating pathway to physical femicide. Perpetrators use these tools to maintain coercive control, locate victims post-separation, and circumvent protection orders. Yet neither the VAW Directive nor most national risk-assessment frameworks treat digital violence as a core lethality indicator.

- **Belgium** explicitly identifies "digital violence" as an emerging and under-recognised risk factor; tracking and surveillance technologies enable perpetrators to maintain control, yet police response and technical capacity remain insufficient and are not systematically embedded in operational risk tools.
- **Spain's** VioGen 2 protocol contains no mention of stalkerware or mandatory training for police to detect technology-facilitated abuse. Data Invisibility: Because the EU does not link digital crime data with homicide statistics, the "digital history" of a femicide victim is often lost during the criminal proceedings.

The 2024 VAW Directive contains some provisions on cyber violence but fails to mandate its integration into standardised lethality risk assessment, protection-order monitoring, or mandatory training for frontline actors. This omission severs the evidential link between cyber-stalking and physical femicide, allowing high-risk cases to be misclassified as "low risk" and enabling preventable deaths.

Women's specialist services, grounded in feminist analysis of power and control, are best placed to identify and respond to digital femicide patterns; yet the Directive's gender-neutral approach risks outsourcing these cases to generic services lacking the required expertise.

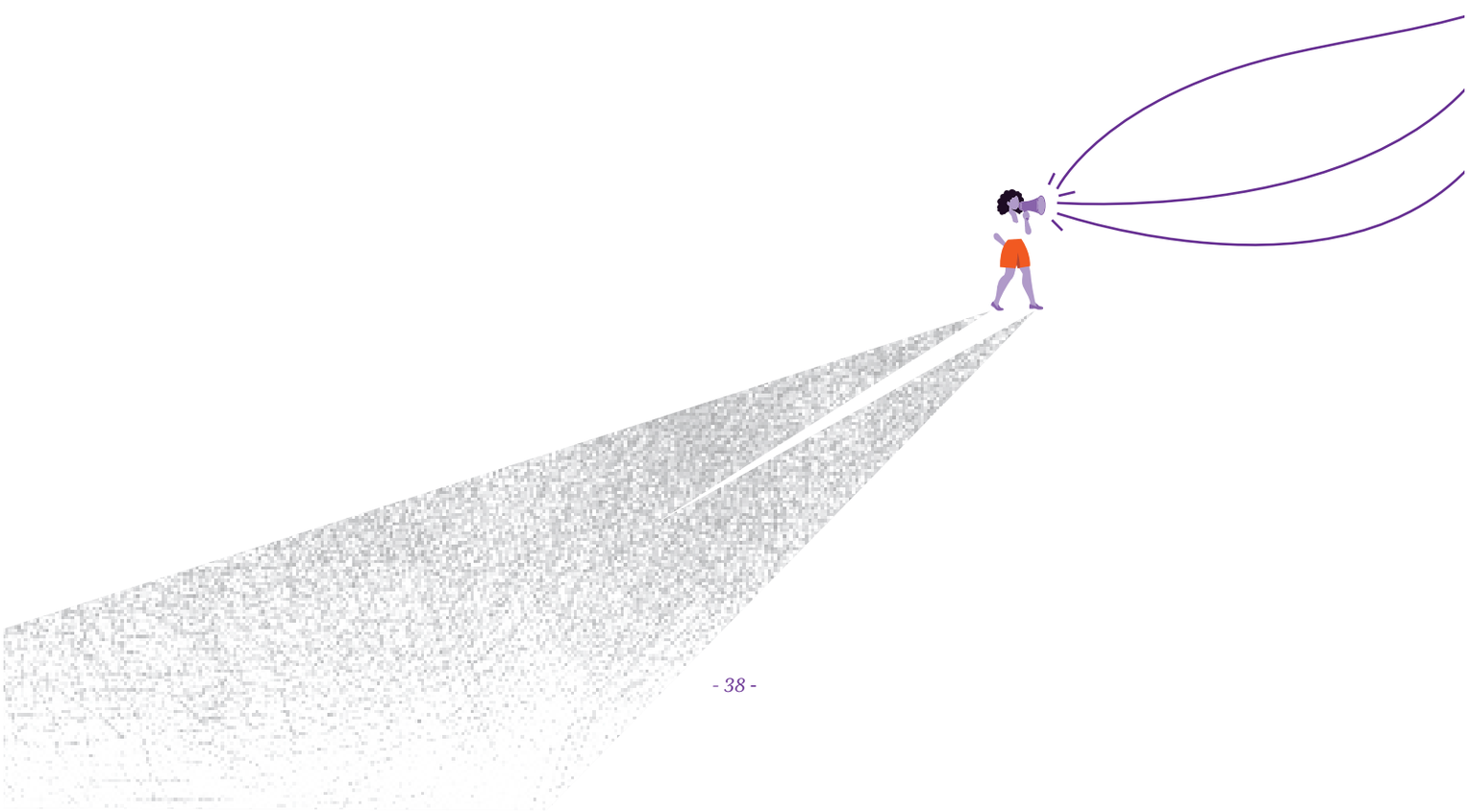


PART 3
STRATEGIC RECOMMENDATIONS



RECOMMENDATIONS FOR THE EUROPEAN COMMISSION

Throughout this analysis of the EU implementation of the Istanbul Convention with a specific focus on femicide, the EWL would like to submit the following recommendations to the European Commission. Across all Member States, femicides remain largely invisible in official statistics, protection orders function as "paper shields," risk-assessment tools fail to integrate coercive control and post-separation dynamics, and EU funding (CERV/Daphne) remains short-term and inaccessible to specialist women's services. These are not isolated national shortcomings but systemic failures stemming from the absence of binding EU-wide standards, harmonised legal definitions, and operational mechanisms. The Commission must act within its competences to close these gaps and ensure that the transformative, gender-specific obligations of the Istanbul Convention are fully realised across the Union.



Mandate an EU-wide legal definition of femicide

The European Commission must urgently propose and secure the adoption of a binding EU-wide legal definition of femicide under Article 83 TFEU. This definition shall be integrated into the VAW Directive through the Article 45 review procedure, enabling consistent criminal classification, prevention, protection and prosecution across all Member States.

Close the lethal data gap: Mandate a binding EU-wide framework for femicide monitoring

I. Building on EIGE's existing (but non-binding) indicators and measurement framework, the European Commission, in cooperation with Eurostat, has to establish a mandatory, harmonised and legally binding EU-wide framework requiring all Member States to collect and transmit annual disaggregated data on femicide. Data shall be disaggregated at minimum by the victim's sex, age, gendered motive, perpetrator-victim relationship, prior history of violence (including coercive control and digital surveillance), firearms access, and protection-order status.

II. EIGE and FRA shall jointly develop and enforce common indicators, counting rules and methodologies to ensure full comparability across the Union, in line with Article 11 of the Istanbul Convention.

Mandate binding EU-wide compulsory training standards for all professionals involved in femicide prevention, with a strong gendered perspective, integrated lethality risk assessment, and trauma-informed approaches to prevent secondary victimisation

I. The European Commission should mandate continuous, specialised training for police, prosecutors, judges, and frontline actors (social services, healthcare professionals, shelter staffs), developed and delivered in partnership with women's specialist organisations. Training must be compulsory, regularly updated, and subject to quality assurance and evaluation mechanisms.

II. Develop and mandate EU-wide operational standards and training modules (in close cooperation with specialist women's NGOs and GREVIO) that explicitly cover:

a. lethality risk assessment with femicide-specific indicators (coercive control, post-separation escalation, stalking, digital violence including stalkerware and tracking technologies);

b. systematic recording of gendered motives and relationship context to close the "invisibility gap";

c. trauma-informed, gender-sensitive interviewing and case-handling practices designed to prevent secondary victimisation;

d. intersectional vulnerabilities, including the specific barriers faced by migrant women.

III. Establish an EU monitoring and accountability mechanism (in cooperation with EIGE and GREVIO) to evaluate the quality and outcomes of national training programmes, with public reporting on their effectiveness in reducing femicide and secondary victimisation.

Introduce binding obligations requiring all Member States to adopt and implement EU standardised, individualised lethality risk assessment protocols for all cases of intimate partner violence and gender-based violence

I. Mandate the systematic integration of femicide-specific risk indicators, including coercive control, post-separation escalation, stalking, digital violence and previous history of violence, into all risk assessment frameworks used by police, prosecutors, judges and frontline protection services.

II. Ensure that lethality risk assessment is operationally linked to the activation, enforcement and continuous monitoring of protection orders and other safety measures, so that identified high-risk cases automatically trigger proportionate protective actions.

III. Require regular evaluation and updating of risk assessment tools in close cooperation with specialist women's NGOs.

Mandate binding EU-wide standards for the effective enforcement and monitoring of protection orders, with particular focus on the European Protection Order (EPO), to prevent femicide

I. Introduce binding obligations requiring all Member States to establish standardised, operational enforcement and monitoring mechanisms for all protection orders (national and EPO), including real-time violation alerts, electronic monitoring where appropriate, and swift, proportionate sanctions for breaches.

II. Mandate the systematic integration of protection-order enforcement with lethality risk assessment protocols so that any breach automatically triggers an immediate review and escalation of protective measures.

III. Strengthen the cross-border effectiveness of the EPO by requiring automatic recognition, immediate enforcement and mutual exchange of violation data across all Member States, with clear procedures to overcome current obstacles to practical application.

IV. Ensure that enforcement failures are systematically recorded and analysed as femicide risk indicators, with mandatory reporting to national and EU-level bodies.

Ensure sustainable and dedicated EU funding for femicide prevention and specialist women's support services

I. Shift from short-term, project-based funding to stable, multi-annual structural and core funding, ensuring the long-term sustainability of specialist services that are essential for effective femicide prevention.

II. Require all EU-funded programmes in the areas of violence against women, asylum, reception, migration and justice to integrate standardised lethality risk assessment tools and gender-sensitive practices.

III. Recognise, fund and structurally integrate women's specialist services and grassroots feminist organisations as expert partners in all multi-agency prevention and response systems (including policy development, lethality risk assessment, referral pathways, case management and service coordination), while preventing the crowding-out of women's civil society by limiting competition between gender-specific initiatives and broader projects lacking demonstrated competence in the theme of violence against women and girls.

SUGGESTED QUESTIONS FOR GREVIO'S 2026 VISIT

To strengthen GREVIO's monitoring of the EU's implementation of the Istanbul Convention the European Women's Lobby proposed the following targeted questions to be addressed to the European Commission during the Committee's visit.

What concrete steps has the European Commission/European Union taken to establish a mandatory, centralised EU femicide registry, including the adoption of a uniform legal definition of femicide and binding obligations on Member States for the systematic recording and transmission of disaggregated data?

Why does the VAW Directive not impose binding, standardised lethality risk-assessment protocols that systematically integrate key indicators such as coercive control, post-separation violence, stalking, and digital tracking technologies?

How does the Commission explain the persistent absence of mandatory inter-agency monitoring mechanisms and immediate sanctions for breaches of national protection orders and European Protection Orders (EPOs)?

How will the Commission/European Union ensure that the next Multiannual Financial Framework (MFF) provides sufficient, stable, and ring-fenced funding for the prevention of violence against women and femicide, including long-term core funding specifically allocated to women's specialist services and grassroots feminist organisations?

How does the Commission/European Union ensure that EU-funded training programmes for police, prosecutors, judges, and other frontline actors systematically include mandatory modules on lethality risk assessment, coercive control, and trauma-informed practice, rather than the current uneven and largely non-mandatory approaches observed across Member States?

What kind of legislative or other measures and programs the European Union is planning or will implement to provide or strengthen access to justice, protection and reparation for the children and family members of femicide victims across Member States?

APPENDIX A

National Evidence Summaries

Instruction Sheet

NGO Contributions to the EU-GREVIO Shadow Report

FOCUS AREA
Femicide & Systemic Lethality Risk

>> OBJECTIVE

To provide GREVIO with evidence of how EU-level policies (or lack thereof) contribute to preventable femicides across Member States. We are not writing national reports. We are using national evidence to prove that EU-level laws (like the Victims' Rights Directive or the VAW Directive 2024/1385) are insufficient. Your data must answer: «How did an EU-level gap fail a survivor in my country?»

THE 3-PILLAR REPORTING TEMPLATE

Please provide your input using these three categories. Limit your total contribution to 3–4 pages.
Please make sure to indicate:

- ☐ the name organisation
- ☐ contact details or the person sending the contribution

Pillar 1

Data & The «Invisibility» Gap

Article 11

TOTAL FEMICIDES

Provide the number of femicides in your country for 2024–2025.

THE GENDER MARKER

Does your national police/judiciary officially record the «gendered motive» or the «relationship to the killer»?

THE EU LINK

Explain why current Eurostat or EIGE data for your country is misleading or incomplete.

Pillar 2

Legal & Protection Gaps

Art. 51, 52 & 60

THE «PAPER SHIELD»

Provide 1–2 examples where an EU Protection Order (EPO) or a national protection order failed to prevent a lethal or near-lethal attack.

THE DIRECTIVE FAILURE

Does the new EU VAW Directive leave out specific protections that are causing deaths in your country (e.g., lack of a consent-based rape definition leading to low risk-assessments)?

MIGRANT SURVIVORS

Are migrant women in your country unable to report lethal threats due to EU «data-sharing» rules between police and immigration?

Pillar 3

The Funding & Resource Gap

Article 8

EU BUDGET IMPACT

Are CERV or ESF+ funds actually reaching the frontline shelters and femicide prevention programs in your country?

SYSTEMIC NEGLECT

Identify if EU-funded training for police/judges in your country is actually happening and if it includes «Lethality Risk Assessment» modules.

Femicide-Specific Indicators Checklist

When gathering your evidence, please look specifically for these «Red Flag» failures:

FIREARMS

Did the perpetrator have a history of DV but still had access to a gun? (Relates to the EU Firearms Directive).

STALKERWARE

Was digital surveillance involved? Is your police force trained on EU-funded tech to detect this?

INSTITUTIONAL INDIFFERENCE

Were there prior reports to the police that were ignored before the femicide occurred? (Relates to Due Diligence).

APPENDIX B

Detailed Femicide Case Analysis

This template is designed to help our NGOs turn a local tragedy into EU-level evidence. Instead of just telling a story, this template forces the writer to link the death to a specific failure of EU law or institutional duty.

Instructions

Please select one representative case from the last 24 months where a lethal or near-lethal outcome occurred. Ensure all names, dates, and locations are changed or removed to protect privacy.

1 Case Profile & Context

SURVIVOR STATUS
e.g., Migrant with/without permit, woman with disability, rural, etc.

RELATIONSHIP TO PERPETRATOR
e.g., Ex-partner, current partner, stalker.

THE «LETHALITY PATH» (Timeline)
List 3–5 key dates before the killing (e.g., first police report, restraining order request, contact with a shelter).

2 The Systemic Failure

Istanbul Convention Mapping

Check the boxes that apply and provide a brief (1-paragraph) explanation.

Article 5 **Due Diligence**
Did the state know (or should it have known) about the risk and failed to take preventive measures?

Article 51 **Risk Assessment**
Was a formal «Lethality Risk Assessment» conducted?

If yes, why did it fail to trigger protection?

Article 52/53 **Protection Orders**
Was there an active order?
How was it breached without consequence?

Article 60 **Asylum/Migration**
Did the victim's residency status prevent her from seeking help?

3 The «EU Policy Gap»

The Core of your Report

This is the most important section for our coalition report. Connect the case to an EU instrument.

VICTIMS' RIGHTS DIRECTIVE (2012/29/EU)
Did the victim receive her «right to protection» and «individual assessment» as mandated by EU law?

EU VAW DIRECTIVE (2024/1385)
Does the lack of a specific «cyber-stalking» or «non-consensual tracking» provision in this directive explain why the perpetrator was able to find her?

GDPR / DATA SHARING
Did «Data Protection» rules prevent agencies (e.g., health and police) from sharing life-saving info about the perpetrator's history?

4 The Systemic Failure

Istanbul Convention Mapping

WHAT EU ACTION COULD HAVE CHANGED THIS?
(e.g., «If there were a mandatory EU-wide Firearms Registry for DV offenders, the perpetrator would not have had access to the weapon used.»)



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18 RUE HYDRAULIQUE - 1210 BRUXELLES - T (+32) 02/217 90 20 F (+32) 02/219 84 51 @ EWL@WOMENLOBBY.ORG - WWW.WOMENLOBBY.ORG