



women

DUTCH GENDER PLATFORM

**EU action plan for gender equality
and women's empowerment in EU
external action (GAP IV)
Call for Evidence feedback**

April 2026

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1. Introduction

WO=MEN Dutch Gender Platform - as one the largest **gender equality networks** in Europe with over 50 organisations and 125 professionals, from development and peace organisations, women's and gender rights organisations, diaspora organisations, trade unions, police, journalists, knowledge institutes, academics, military personnel, entrepreneurs, students and opinion-makers - welcomes the opportunity to contribute to the development of the fourth European Gender Action Plan (GAP IV). At a time of growing and global backlash against gender equality, shrinking civic space and increasing geopolitical and economic instability, an ambitious and coherent GAP IV demands political priority to sustain and advance the EU's commitments to gender equality and women's rights in external action.

GAP IV must address key challenges such as implementation gaps, financing, policy coherence and accountability and meaningful engagement with gender equality and women's rights organisations, as identified under previous Gender Action Plans.

Recommendations:

- Maintain the core principles of GAP III: intersectionality, human rights-based approach and gender-transformative approach. Also maintain in GAP IV a broad geographical scope at multilateral, regional and country level, as well as a broad thematic scope, as gender equality is a cross-cutting issue integral to all the EU's external policy areas.
- The EU must significantly increase funding for women's rights organisations, particularly feminist and grassroots movements, both in Europe and externally, who are critical actors in upholding human rights, advancing democracy, and reaching marginalised communities. *Ensure funding is flexible, long-term, accessible and allocated through transparent and participatory mechanisms that allow gender equality and women rights organisations to set their own priorities.* Dedicate at least 5% of ODA to supporting gender equality and women's rights organisations.
- Gender equality must be fully integrated through systematic gender mainstreaming and targeted actions across the EU's external actions. This requires robust gender mainstreaming and gender budgeting across defence, security, migration and crisis preparedness, and the EU's external agendas on sustainable competitiveness, economic and social rights and security, and the green transition and digital transformation.
- Furthermore, GAP IV should stimulate targeted interventions to address priority topics with a gender-transformative approach. *Keep the EU's commitment from EU GAP III that at least 85% of all new external action programmes contribute to gender equality (Gender Marker 1 - significant objective) and raise the goal for gender-principal actions (Gender Marker 2) from 5% to 20%.* A higher target on gender-principal programmes signals a strong commitment to advancing gender equality, which the EU must demonstrate to counter growing authoritarianism and the instrumentalisation of gender equality to attack democracy and human rights.
- Align GAP IV with international binding treaties and commitments on human rights, including the European Convention on Human Rights (ECHR), the Charter of Fundamental Rights of the European Union (CFR), the Convention on the Elimination of All Forms of Discrimination against Women

(CEDAW) and the Istanbul Convention. Protect, promote and invest in Sexual and Reproductive Health and Rights (SRHR), for the right to self-determination for all women and girls. Remain committed to the full and effective implementation of the Beijing Platform for Action, the Commission on the Status of Women (CSW) and the Programme of Action of the International Conference on Population and Development (ICPD), as well as the outcomes of their review conferences. Continue to place the rights and position of all women and girls, at the forefront of the political agenda, also in security and human rights dialogues. In line with the UN's agenda for sustainable development, adhere to the principle of "Leave No One Behind".

- The EU needs to demonstrate its commitment at the highest level. Therefore, GAP IV should be an official Communication, rather than a Staff Working Document. It should also be endorsed by the Member States through Council Conclusions and by the European Parliament, so that it commits both Member States and EU institutions.



2. Addressing root causes of gender inequality for systemic change

Structurally implement an intersectional and transformative approach

Tackling structural gender inequalities requires implementing a transformative and intersectional approach that addresses root causes and overlapping systems of oppression, based on race, class, poverty, disability, migration status, sexual orientation and gender identity, and more. A particular focus is needed on unequal structures and power relations, gender norms, discriminatory laws and practices, gender-based discrimination and supporting girls and women's agency at its centre, included in all thematic objectives and supported with indicators and activities.

Recommendations:

- Invest in systematically collecting accurate and comparable disaggregated data and in supporting partner countries to do so, with the goal to know where and what the intersectionalities are, to determine how to address them and to analyse whether the results of interventions are having a positive impact on those furthest behind. Data should be disaggregated by income, gender, age, race, ethnicity, migratory status, disability and geographic location.
- GAP IV should be accompanied by clear, measurable, time-bound targets, including an attribution of responsibility to different actors – European Commission, the EEAS and all relevant DGs, EU delegations and Member States embassies - and with clear objectives in each partner country, developed with the partner country and civil society organisations (CSOs), incl. community-based women’s CSOs, which are integrated in political dialogue and programming.
- Gender expertise and resourcing vary across EU Delegations. GAP IV should mandate training for staff (including GBV), strengthen delegation-level focal points, and embed accountability measures for gender performance. Partnerships with civil society can enhance capacity. Measurable staffing and resource commitments are required to operationalise EU gender commitments.
- Retain the requirement for EU delegations to update their gender country profiles (GCPs). Moreover, retain the requirement to design (updated) Country-Level Implementation Plans (CLIPs), based on an intersectional gender analysis and robust and inclusive consultation with community-led CSOs and trade unions. Continue to engage CSOs, including gender equality and women’s rights organisations and coalitions in partner countries beyond CLIPs consultations throughout all stages of GAP IV implementation and monitoring.
- The EU should include both quantitative indicators and qualitative indicators such as inclusive monitoring, evaluation and learning (MEL). This implies not just measuring the number of people that participate in an activity but also evaluating the transformative potential/impact of that activity (e.g. in terms of changing mindsets related to gender roles).

Improve access to decision-making at all levels

Women and girls in all their diversity must have equal decision-making power at all levels, including in but not limited to: peace and security, education, SRHR, civic space, climate action, just transition, criminal justice systems, trade, investment and decent work. Structural barriers continue to hinder women's and gender-diverse people's full participation in economic, political, and public life. This means also recognising and supporting the voice and leadership of underrepresented groups, including women with disabilities, women in detention, migrant and refugee women, women of colour, LGBTQIA+ persons, women trade unionists, women workers and sex workers.

Provide direct, flexible funding to national and sub-national level gender equality and women’s rights organisations and coalitions to support women’s participation in (political) decision-making spaces, at all levels. That includes resources and political support for women in conflict-affected countries to actively participate in regional and global decision-making spaces.

Include the commitment in GAP IV as the EU to always speak out and be an example at international fora – in writing, in speech and in voting – for protecting and strengthening respect and application of human rights, women’s rights and international (humanitarian) law. This includes SRHR, laws and policies against discrimination and GBV, and the participation of all women and girls in political decision-making at all levels on all topics. Protect red lines on laws, policies and resolutions on gender equality and women’s rights (including, but not limited to the ECHR, the CFR, CEDAW, the Istanbul Convention, UNSCR1325 and follow-up resolutions), defend all accepted progressive language, and strengthen this whenever possible.

Improve access to resources for women's rights organisations

Provide direct, longer-term (multi-year), flexible and accessible funding to community, national and community-based gender equality and women's rights organisations and coalitions working on political representation and participation of women and girls in all their diversity, SRHR, LGBTQIA+ rights, civic space (access to) education, peace and security, climate action, just transition, access to justice, trade and decent work. Ensure funding is allocated through transparent and participatory mechanisms that allow gender equality and women rights organisations to set their own priorities. Local leadership is key. Make sure reporting requirements do not overburden CSOs, including community-based women's organisations. Evidence shows that inflexible programme design [risks](#) limiting women's participation, through pre-defined activities that are unable to respond to dynamic, ever-evolving contexts.

Continue investing in combatting gender-based violence (GBV)

In GAP IV stronger action needs to be taken to prevent and respond to online and offline gendered violence, targeting women in all their diversity. Evidence shows that especially women human rights defenders, activists, journalists and politicians [are a target](#) for online hatred, threats and violence. Violence against indigenous women and girls also continues to be [very high](#). Race and ethnic discrimination, colonialism, age, gender, and dispossession of lands put indigenous women in positions that expose them to higher rates of GBV. Furthermore, it's important to invest in addressing discriminatory laws that are a root cause of GBV and impact women and girls disproportionately. This should include women and girls in prison, as 'morality' laws, discrimination and the criminalisation of life-sustaining activities are behind a [significant increase](#) in the number of women in prison.

Recommendations:

- Align GAP IV with the implementation of the EU Directive on violence against women, in alignment with the Istanbul Convention, now ratified by the EU.
- Support the capacity and actions of civil society organisations involved in the fight against sexual and gender-based violence. Ensure that access to comprehensive survivor-centered GBV response services is explicitly addressed, also as part of every humanitarian response.
- Make gender assessments and GBV risk analysis mandatory in all programming to ensure policy alignment translates into meaningful action.
- Invest in Comprehensive Sexuality Education (CSE) with women, girls, men and boys.
- Engage men and boys to challenge harmful gender norms and stereotypes and encourage shared caregiving responsibilities.
- Encourage all EU Member States and partner countries to ratify the ILO Convention 190 on ending harassment in the world of work.
- Align GAP IV with the Digital Service Act (DSA). Support should be available for states and civil society to help regulate and create more accountability and transparency within these platforms to protect gender equality and women's human rights.

Counter anti-rights actors by strengthening the feminist movement

In all its external actions, the EU needs to take proactive and coordinated action to counter the growing influence of [anti-gender](#), [anti-rights](#), and [anti-democratic](#) movements. Research shows that these movements are increasingly organized, transnational and [well-resourced](#). These actors undermine gender equality, human rights, and the rule of law through digital disinformation, populist narratives, and attacks on civil society. In GAP IV explicit attention must be given to the transnational and coordinated nature of the anti-gender movement, as well as the broader [deregulation agenda](#) of rolling back existing social and environmental standards in the name of competitiveness, and its implications for human rights and democratic safeguards.

Address in GAP IV the trend of shrinking civic space for NGOs and CSOs working on human and social rights, democracy and rule of law, including gender equality and women's rights organisations and individual (women) human rights defenders in international dialogues and in bilateral dialogues with partner countries. Support gender equality and women's rights organisations and coalitions as the frontline defenders of European values regarding democracy, rule of law and human rights. Step up via protection systems and direct, flexible financial support.

3. Women, Peace and Security Agenda

Intersectional approach EU GAP and Women, Peace and Security

WO=MEN welcomes the fact that within the EU Gender Equality Strategy 2026–2030, the Women, Peace and Security (WPS) agenda is emerging as a stronger and more clearly institutionalised pillar of EU external action. Its integration across European Commission frameworks, combined with a cross-cutting and intersectional approach, reflects growing recognition that gender, peace, security and inclusive development are deeply interconnected. In a period marked by (hybrid) war in Europe, disinformation and anti-rights movements, increase in the number of armed conflicts worldwide (with sharp increase in the number of casualties among civilians, displaced persons, and refugees, and the rise of rape as a weapon of war), rise in authoritarianism and democratic backsliding, the EU's credibility as a security and peace actor depends on its ability to advance inclusive, sustainable and rights-based peace. GAP IV is a key strategic instrument to do so, as a vehicle to strengthen peacebuilding, civil society and democratic resilience. Inclusive approaches have proved to lead to stronger and more sustainable peace and security solutions. Securitisation and [militarisation](#) of international policy is not only a potentially direct threat to the safety and security of women and girls but also may tend to put the focus on national security instead of human security from a whole of society approach. The WPS agenda will be key in bringing the human aspect of security and stability forward: work on conflict resolution, resilience against external shocks, stability at community level, work on human security.

Fact and figures on Women, Peace and Security

Over the past decade, the number of women and girls living in conflict-affected settings has increased, while their exclusion from peace negotiations, political processes and formal decision-making remains persistently [low](#). [In 2024, women were absent from nine out of ten peace processes worldwide; only 7% of negotiators and 14% of mediators were women, while conflict-related sexual violence increased sharply, including in places of detention](#). These figures underscore the continued gap between commitments and realities: women bear a disproportionate burden of conflict, yet their agency remains marginalised in shaping peace and security outcomes.

Gender-responsive peacebuilding and conflict prevention are therefore not peripheral to EU external action, but central to its normative foundations in peace, democracy, human rights and the rule of law. Women's equal and meaningful participation in peace processes, post-conflict reconstruction and security decision-making, particularly in leadership and agenda-setting roles, is essential for legitimacy, effectiveness and sustainability. A critical question remains how commitments will be translated into practice. [As underscored by repeated calls from the UN Security Council and UN Women](#), the lack of sex-, age- and diversity-disaggregated data, weak monitoring frameworks and inconsistent accountability continue to undermine effective WPS implementation. UNSCR 1325 and subsequent resolutions explicitly call on Member States and institutions to strengthen data collection, analysis and reporting to inform evidence-based peace and security policies. UN Women has consistently emphasised that better data is not a technical add-on, but a political imperative for identifying gaps, tracking impact and ensuring accountability for women's participation, protection and leadership.

EU and National Action Plans as strategic and operational tools for women, peace and security

Against this backdrop, [National Action Plans on UNSCR 1325](#) (NAPs 1325) remain an essential implementation tool. When adequately resourced and monitored, NAPs provide a concrete framework to translate EU WPS commitments into policy coherence, cross-sectoral coordination and measurable outcomes at national and EU-levels. GAP IV should therefore explicitly recognise and reinforce NAP 1325 implementation as a key delivery mechanism for WPS across EU external action and its security and defence approach, including through stronger alignment with EU programming, funding instruments and dialogue with civil society.

There are compelling strategic and institutional reasons for the EU to adopt an integrated whole of society security approach that fully embraces the WPS-agenda. [Evidence consistently shows that peace agreements with meaningful participation by women are more durable](#), and that societies with smaller gender gaps are safer, more stable and less prone to violent conflict. Conversely, repression of women and LGBTQIA+ persons is closely linked to societal instability, polarisation, shrinking civic space and democratic erosion. Gender equality is therefore not only a normative commitment, but a strategic investment in conflict prevention, peace and democratic resilience.

This integrated whole of society approach requires balance and funding. While increased defence spending and military preparedness are understandable responses to real security threats, a disproportionate focus on militarised solutions risks crowding out investments in diplomacy, conflict prevention, social cohesion and care systems: the foundations of long-term human security. Civil society has a central role in this regard. Women-led and inclusive civil society organisations, peacebuilders and human rights defenders are often at the forefront of conflict prevention, mediation, accountability and social cohesion. GAP IV should explicitly recognise civil society not only as an implementing partner, but as a strategic actor in peace and security governance especially in the context of militarised masculinities. This requires sustained dialogue, consultation and protection of civic space, human rights defenders and predictable, flexible and long-term funding as, particularly for community and women-led organisations in conflict-affected settings.

Recommendations:

- Integrate and commit to the WPS-agenda, across all EU external action, including peace mediation, security and defence, humanitarian response, enlargement, neighbourhood policy, and migration governance, with explicit responsibilities assigned to relevant EU institutions and delegations.
- Fundamental coordination is needed between (or blending of) the pillars of humanitarian, development, and peace work, as well as coherence with the EU's Common Foreign and Security Policy (CFSP), the Common Security and Defence Policy (CSDP), and the European Democracy Shield (EDS). GAP IV should translate coherence (the nexus) between humanitarian, peacebuilding, and development into concrete actions.
- Support accessible, community-based justice mechanisms in conflict settings and ensure protection and rights of women in detention, including those at risk of conflict-related sexual violence.
- Establish concrete mechanisms to ensure women's participation and leadership in peace and security decision making, such as mandatory consultation with women's rights and women-led organisations in peace processes supported by the EU, minimum participation benchmarks, and safeguards to prevent tokenistic involvement.
- Strengthen accountability for WPS commitments by integrating WPS-specific indicators, targets, and reporting requirements into existing monitoring and evaluation frameworks, including annual reporting by EU delegations and systematic follow-up on identified implementation gaps.

- Allocate traceable financial resources for WPS, including earmarked funding lines within external action instruments to support women’s leadership, women-led peacebuilding organisations, feminist conflict prevention initiatives, and protection for women human rights defenders working in conflict-affected and fragile contexts.
- Ensure coherence across EU policies by requiring that security-, defence-, justice- and migration-related initiatives under the Gender Action Plan are explicitly assessed for their alignment with WPS commitments, including through gender and conflict-sensitivity impact assessments.
- Invest in support to NAP 1325 development, with a special focus on realistic implementation plans and availability of national budgets that focus on community-based, women-led initiatives around WPS.
- Reflect critically on top-down approaches (SSR, military interventions) and how these should better integrate concepts of ‘do-no-harm’ to, or rather build on, positive potentials for peace at community level, explicitly promoting the important role of women.

4. Advancing women’s economic empowerment as a strategic objective of EU external investment and trade policies

GAP IV should position women’s economic empowerment as a strategic objective of EU external investment, trade, and development cooperation. Achieving gender equality requires addressing structural inequalities in labour markets, access to resources, social protection systems and decision-making power. These challenges are closely linked to business practices, global value chains and investment models. This underscores the importance of embedding gender-responsive due diligence and regulatory frameworks within GAP-IV implementation.

Decent work, equal pay and labour rights

Promoting decent work, equal pay and labour rights is essential to advancing gender equality. Women remain overrepresented in precarious, low-paid and informal work, often without access to social protection or collective bargaining and limited enforcement of rights. This is particularly relevant in sectors with a majority of women workers, such as domestic work, care, agriculture and textiles, as well as in informal work, or non-traditional and emerging sectors, including energy, infrastructure and digitalisation. Without targeted intervention, large-scale investment initiatives risk reinforcing existing inequalities rather than transforming them.

Corporate accountability and binding regulatory frameworks

Regulatory frameworks such as the EU’s Forced Labour Regulation and the Corporate Sustainability Due Diligence Directive (CSDDD) offer entry points to address gendered risks in supply chains, including forced labour and exploitative working conditions. GAP IV should therefore promote gender-responsive implementation of due diligence obligations, including gender-disaggregated risk assessments, meaningful consultation with women workers and women’s rights organisations and corrective measures that address gender-specific harm.

Furthermore, the negotiations for a UN binding treaty on business and human rights are an opportunity to effectively address corporate violations of women’s rights. This requires the EU to set up an ambitious mandate to join the negotiations and centre the differentiated and disproportionate impact of business activities on women and girls.

In addition, GAP IV should explicitly recognise and address the role of private sector practices in exacerbating gender inequality. Discriminatory workplace practices, including persistent gender pay gaps and the underrepresentation of women in leadership, and gender-unaware products and services limit women's economic empowerment.

Gender in trade agreements

Recent EU trade and investment agreements included dedicated gender chapters or gender-related provisions. While this is a positive development, their effectiveness depends on enforceability, implementation, monitoring and meaningful participation of women's rights representatives.

GAP IV should recognize that the inclusion of gender chapters alone is insufficient if commitments are not translated into concrete actions. Every new EU trade agreement should include gender provisions that are integrated into the overall structure of the agreement and linked to labour, sustainability and dispute-settlement mechanisms, and include clear institutional responsibilities and monitoring frameworks.



Enabling conditions and structural constraints

Creating an enabling environment for women's economic activities requires addressing persistent barriers to productive resources and ecosystem services. Women's access to land, water, technology and finance remains highly unequal. In many contexts, women also face constraints related to legal identity, documentation, mobility and personal safety, limiting their participation in markets and value chains. These factors should be recognised as structural constraints and addressed in investment and development programmes.

Social protection and social dialogue

Evidence and operational experience show that [universal social protection systems](#) are needed to enable women's economic participation and reduce inequality. Recognising, reducing and redistributing unpaid care and domestic work is critical for enabling women's participation in paid employment, entrepreneurship and public life. GAP IV should emphasize supporting universal, publicly financed and accessible social protection systems, the promotion of social dialogue between women workers and employers to reduce informality, and on promoting gender-responsive budgeting as a policy tool. GAP IV should ensure funding to boost women trade union leadership to advocate for gender equality at work. Investments in care infrastructure and services should be understood as productive investments that generate employment, strengthen resilience and support inclusive growth.

Transforming gender norms

Challenging gender norms within the economy, labour markets and households is equally necessary. [Persistent expectations](#) around care, breadwinning and leadership roles continue to shape women's and men's economic choices. GAP IV should therefore promote interventions that engage men and boys, recognise their shared responsibilities for care work and support progressive legislative developments, such as the introduction and effective implementation of paid paternity leave. The shifting of norms is essential for ensuring that gains in women's economic participation are sustainable and not accompanied by increased unpaid workloads.

Women's entrepreneurship

Supporting women's entrepreneurship and women-led businesses, including social enterprises, can create inclusive growth, innovation and local job creation, and will boost self-confidence and power to participate more actively in society and in decision-making processes. Despite this, women continue to face significant barriers in accessing finance, markets and business development services. The EU should address market failures that prevent financial institutions from reaching women entrepreneurs. Targeted support is particularly needed for women in recovery contexts, crisis situations and forced displacement, where economic exclusion is both a cause and a consequence of vulnerability.

The link between women economic empowerment and civic space

GAP IV should acknowledge that women's economic empowerment is undermined where civic space is shrinking, particularly around land, labour and environmental rights. Shrinking civic space directly undermines the effectiveness of due diligence frameworks, as it restricts access to independent monitoring, organisation of affected communities and effective remedies.

Recommendations:

- Provide binding regulations and minimum standards for and accountability of companies that violate the rights of women and girls, ensure coherence across EU regulatory frameworks including the CSDDD and the EU Forced Labour Regulation, and provide concrete implementation guidance to economic operators for gender-responsive due diligence and procurement;
- Mainstream gender equality objectives in trade policies and agreements. Require ex-ante and ex-post gender impact assessments for all EU investment and trade agreements, and major external investment initiatives, with public reporting on gender-differentiated outcomes, and ensure implementation and enforceability;
- Ensure equal access to procurement opportunities and remove systematic barriers for women-owned and women-led businesses, including cooperatives and social enterprises, to participate in supply chains and investment opportunities;

- Strengthen consultation and participation mechanisms with women’s rights organisations, including feminist, environmental and grassroots organisations and trade unions, and (representatives of) affected communities, to support risk identification, monitoring and remedy;
- Integrate safeguards and protection for women human rights defenders and whistleblowers, and guarantee access to effective remedy for women and girls affected by business-related rights violations;
- Prioritise universal social protection systems and the care economy, including through support for social dialogue between female trade unionists and employers, publicly financed social protection and investments in care infrastructure and services.

5. Leverage Global Gateway and the Team Europe Approach for gender equality

The EU Gender Strategy 2026-2030 identifies the Global Gateway Initiative as a key instrument for benefits for health, food security and nutrition and promoting women’s increased access to decent jobs, entrepreneurship and income security. To ensure these objectives are realised, stronger coherence with humanitarian, peacebuilding and development instruments including EU Humanitarian Aid, the EU Civil Protection Mechanism (UCPM) and Global Gateway investments, is essential. Furthermore, GAP IV should provide strong operational guidance and accountability mechanisms for integrating gender equality across Global Gateway and Team Europe initiatives, integrated in all stages of the project cycle.

GAP IV should include concrete measures to ensure that women-led businesses and women’s rights organisations can effectively participate in Global Gateway opportunities, that women are equally represented in decision-making and governance bodies, and that women’s rights organisations are meaningfully engaged and consulted. The Global Gateway Initiative will lead to more European private sector involvement in development projects. This is particularly important, [given evidence](#) that increased private sector involvement can lead to reduced transparency in funding flows, project pipelines, monitoring and Official Development Assistance (ODA) being spent on European companies. To mitigate these risks, GAP IV should mandate gender and GBV risk assessments, and robust safeguarding standards for private sector partners. Additionally, transparent reporting on the financing, implementation and effects of the projects needs to be ensured. The reporting process needs to include women-led businesses and the effect on the local population, including women. Monitoring must track real gender outcomes, not just compliance.

GAP III included a commitment to ensure gender-responsive review processes for all Global Gateway and Team Europe initiatives. [Research and operational experience show this commitment has not yet been consistently implemented.](#) GAP IV should address this gap by establishing mandatory gender-responsive review processes and publicly reporting the results.

Meaningful participation of civil society is needed to ensure that Global Gateway investments contribute to closing gender gaps rather than exacerbating inequalities. The Civil Society and Local Authorities Advisory Platform (CSLA) should be positioned as a central form for consultation in decision-making processes, similarly to the Business Advisory Group, and should include women’s rights organisations, to identify gender-specific risks and opportunities, as well as to ensure local leadership and women-led enterprises shape projects

Recommendations:

- Define gender equality requirements for Global Gateway and Team Europe initiatives, including targets, indicators and transparency and reporting obligations covering governance, procurement, employment and development impacts across the full project cycle;
- Operationalise gender-responsive review processes for all current and new Global Gateway initiatives in line with GAP III commitments, with clear accountability and follow-up, and public reporting on results and corrective actions;
- Strengthen the role of the CSLA Advisory Platform and integrate them in Global Gateway decision-making processes. Ensure gender equality and women's rights organisations are meaningfully represented in the Platform, by formalising the collaboration with NGOs and local civil society as part of a structured and decision-shaping consultation process;
- Establish a concrete framework to monitor the consultation of affected communities, with specific focus on the participation of women and make sure their concerns are taken into account during the project implementation, and reflected in monitoring, mitigation and remedy mechanisms;
- Require mandatory gender and gender-based violence (GBV) risk assessments and enforce robust safeguarding standards for all private sector actors involved in Global Gateway and Team Europe initiatives, including clear responsibilities, monitoring and consequences for non-compliance.



6. Gender-responsive approach to migration and displacement

While the European Commission recognises the importance of applying a rights-based, gender-responsive approach to migration, the new EU Gender Strategy devotes limited substantive attention to migration and

displacement from a gender perspective. This gap makes it particularly important that the new EU GAP provides explicit and sustained attention to the situation of women and girls on the move.

The European Commission affirms the importance of *“applying a rights-based, gender-responsive approach to migration, safeguarding women’s and girls’ rights along migration routes and in displacement, addressing gender-specific risks such as violence, abductions and trafficking, and improving access to protection, services and durable solutions.”* While this commitment aligns with international standards, experience from previous EU GAPs demonstrates that migration and displacement have received limited sustained attention and weak operationalisation from a gender and Women Peace and Security perspective. As the EU Gender Equality Strategy 2026–2030 devotes insufficient focus to these issues, the upcoming GAP IV presents a critical opportunity to address persistent gaps through clearer priorities, accountability and implementation mechanisms.

The need for a gender perspective in migration and asylum processes

Migration and displacement are deeply gendered processes. Women, girls and boys on the move face heightened exposure to discrimination, sexual and gender-based violence (SGBV), trafficking and exploitation, [as consistently documented](#). These risks manifest across the entire migration trajectory, from countries of origin and transit routes to borders, reception facilities, detention and return. Importantly, experience shows that violence is not limited to non-state actors such as smugglers and traffickers: abuse may also be perpetrated by institutions which leave migrant and displaced women inadequately protected. Research highlights that conflict, fragility and displacement significantly increase women’s vulnerability while simultaneously undermining access to justice, healthcare, livelihoods and participation. Safeguards that are formally available but practically inaccessible to women with irregular or insecure status fail to meet rights-based standards. Effective gender-responsive migration policy must therefore ensure protection against SGBV, trafficking, exploitation and abuse by both state and non-state actors, supported by accessible, independent accountability mechanisms. Protection frameworks must apply irrespective of migration status, recognising that fear of detention or deportation often prevents women from seeking help or reporting abuse.

Access and participation of migrant and displaced women

Access to services remains uneven and often conditional, undermining the effectiveness of EU commitments. Gender-responsive protection requires guaranteed access for displaced and migrant women and girls to comprehensive healthcare, including sexual and reproductive health services, psychosocial support, legal aid and safe, confidential reporting channels. [CEDAW’s recent Concluding Observations on the Netherlands repeatedly stress that structural barriers in asylum and reception systems restrict women’s access to essential services](#). Crucially, experience has shown that policies designed for migrant and displaced women without their involvement tend to be ineffective and unsustainable. The meaningful participation of displaced and migrant women in the design, implementation and monitoring of EU-funded migration and displacement responses must be strengthened. Recognising women on the move not only as beneficiaries but as rights-holders and agents of change improves policy relevance, accountability and outcomes. EU GAP IV must therefore move beyond policy language and include concrete delivery and monitoring mechanisms to ensure services reach those most at risk. Finally, a consistent lesson across EU gender and WPS programming is the need for policy coherence and accountability. Migration governance cannot be siloed from gender equality, human rights and WPS obligations. Integrating WPS commitments into migration policy, with clear indicators, reporting requirements and political ownership, is essential to prevent gender equality from remaining rhetorical.

A rights-based, gender-responsive approach to migration and displacement is therefore not optional, but a legal and political necessity. By embedding lessons learned from CEDAW, NAP 1325 and previous GAP

cycles, the upcoming GAP IV can deliver more coherent, accountable and effective protection and participation for women and girls on the move.

Recommendations:

- Explicitly recognise migration and displacement as priority areas requiring a gender-responsive and WPS-aligned approach across EU external action, including humanitarian, development, security, and migration policies.
- Ensure protection against gender-specific risks along migration routes and in displacement, including sexual and gender-based violence, trafficking, exploitation, and abuse by both state and non-state actors, with clear accountability mechanisms for violations.
- Guarantee access to gender-responsive protection and services for displaced and migrant women and girls, regardless of legal status, including access to healthcare, psychosocial support, legal assistance, and safe reporting mechanisms.
- Strengthen the participation of displaced and migrant women in the design, implementation, and monitoring of EU-funded migration and displacement responses.
- Integrate WPS commitments into migration governance, ensuring coherence between migration policies and the EU's obligations under WPS, human rights, and gender equality frameworks.
- Include women and girls with a refugee background in decision-making processes.

7. Gender-responsive approach to climate action and biodiversity protection

The climate crisis, together with the accelerating loss of biodiversity, represents one of the most pressing challenges of our time. The current [EU Gender Equality Strategy \(2026-2030\)](#) acknowledges the implications of climate change for women and girls but falls short of addressing them effectively. The impact of climate change on women and girls remains framed only in an abstract global context, rather than as an area requiring targeted, gender-responsive action.

How are gender equality, climate and biodiversity connected?

As a result of legislation, policy, social norms, and discrimination, women and girls have less access to income, funding, education, employment, and agricultural land. Due to these inequalities, women and girls are often [more severely affected](#) by the effects of the climate and biodiversity crises. Deforestation, for example, has specific consequences for women and girls. In many areas of the world, girls miss school as they are expected to help collect firewood. As deforestation forces them to travel further, they miss even more school. This not only hampers their development but also exposes them to a [greater risk of sexual violence](#).

This is not only unfair, but it also undermines effective policy design. Women in all their diversity contribute to the conservation of biodiversity, restoration of our ecosystems, and to the implementation of successful climate solutions, drawing on their expertise, including their local and Indigenous knowledge. In addition, various studies confirm (e.g., [IPCC](#)) that women's equal participation in decision-making processes and leadership structures leads to more ambitious commitments on climate and biodiversity action and contributes to [more effective solutions](#).

However, despite their knowledge and contributions, evidence shows that women are frequently excluded from the tables where political decisions are made. In 2024, [only 15.96%](#) of ministerial and top civil service positions in environment-related ministries were held by women worldwide. Besides, women-led

organisations that drive climate solutions face serious barriers to accessing funding. [Only 10%](#) of international climate finance reaches the local level directly. Community-led women's organisations are even less likely to benefit. In 2018-2019, [only 0.22%](#) of climate-related development cooperation reached women's rights organisations. Meanwhile, many women human rights defenders around the world cannot freely speak out against their governments and often work in conditions that put their own lives at risk. [UN Women confirms this](#). In January 2022, the online Environmental Justice Atlas [registered 523 environmental conflicts](#) involving women defending environmental and land rights, and in [at least 81](#) of these conflicts, women human rights defenders were killed.

The need for a gender-just energy transition

The EU's own climate policies can also unintentionally entrench gender equality abroad. Many EU countries are engaging in the energy transition as part of their climate action policies. This requires transition minerals extracted primarily in countries in the Global South, where mining is often linked to environmental and social abuses. [Evidence shows that women bear the brunt of this industry](#): the extraction of resources, like those used for the energy transition, is often associated with an increase in gender-based violence, as well as additional unpaid care work for women due to environmental damage, loss of biodiversity, and pollution. For example, a [social audit from 2018 on the manganese mining industry in South Africa](#) reveals that while both women and men suffer health impacts from pollution caused by mining activities, such as persistent coughing and asthma, women face the additional burden of caring for sick family members. Besides, women face limited access to employment and other economic activities, making it very difficult to support themselves and their families. Therefore, it is crucial that the EU Commission addresses the gendered dimensions in GAP IV of the EU's transition minerals supply chains.



Include gender equality in climate action and biodiversity protection

WO=MEN calls upon the European Commission to include gender equality in climate action and biodiversity protection as a key priority in the upcoming GAP IV. This is not only just but also ensures that the EU's external action will effectively address one of the defining crises of our time. This plan should build on the foundations set by existing international frameworks. [The Paris Agreement](#) explicitly outlines the need to promote gender equality in climate action. This commitment is reinforced by [the United Nations Framework Convention on Climate Change \(UNFCCC\)](#) and [the Convention on Biological Diversity \(CBD\)](#), all of which emphasise the need to integrate gender equality in climate and biodiversity policies and action. These conventions provide a clear roadmap, translated into the [Gender Action Plan Belém](#) under the UNFCCC and the [Gender Action Plan](#) under the CBD. The challenges across these areas can only be addressed through a common and integrated approach. Therefore, it is crucial that the upcoming GAP IV aligns with these existing international commitments and frameworks.

Recommendations:

- We call upon the European Commission to build upon the [GAP III action points](#) on promoting a fair and inclusive green transition. Ensure that the forthcoming GAP meaningfully advances principal gender equality objectives in the context of a rapidly changing climate, with concrete and actionable commitments towards inclusive climate action and biodiversity protection.
- Promote coherence and ensure that the new GAP is clearly in line with the Paris Agreement and other relevant international environmental standards, such as the Renewed Gender Action Plan Belém (UNFCCC) and the Gender Action Plan under the CBD.
- Ensure women's and girls' meaningful participation in all stages of decision-making and planning of mitigation, adaptation and climate resilience initiatives at all levels. This includes guaranteeing the representation of women's groups at international climate negotiations and dialogues.
- Provide sufficient, accessible financial resources to support gender-just climate actions. For example, use eased accreditation procedures and accountability mechanisms, offer lower starting amounts, and provide long-term funding with more flexibility. Moreover, prioritise climate solution initiatives led by women-led grassroots organisations. Besides, it should be ensured that there is targeted gender-responsive funding and programmes for women's rights and feminist organisations themselves to strengthen resilience and agency against climate change.
- Protect and support women environmental and human rights defenders worldwide who are engaged in climate-related advocacy. Ensure that they participate in international and bilateral dialogues with partner countries.
- Ensure that GAP IV explicitly addresses the gendered dimensions of the EU's transition minerals supply chains, including commitments to tackle gender-based violence, unpaid care burdens, and the exclusion of women from land rights and decision-making in mining-affected communities in the Global South.