



End Female Genital Mutilation European Network

Feedback to EC Consultation on the 2026-2030 EU anti-racism strategy

1. Introduction

At the end of the period covered by the current EU-wide Anti-Racism action plan, we unfortunately witness that racism and discrimination remain prevalent¹, if not increasing, in the European Union. As reported by the Fundamental Rights Agency (FRA) in its latest annual report, “racism, discrimination, bias-motivated harassment and hate crime are a daily reality for many people. Inequality continues to disadvantage people of various ethnic backgrounds and religions”². This bleak reality testifies to the urgency for EU and all Member States to be determined in seriously address the root causes of structural racism and discrimination and have in place effective measures for their uprooting.

Racial discrimination is also deeply linked to gender-based violence such as female genital mutilation (FGM). FGM-affected communities face intersecting forms of discriminations that include racism, xenophobia and islamophobia. Racism is prevalent and systemic within society and must be recognised and addressed to ensure fairness, inclusivity, and effectiveness including towards ending FGM. Racism affects FGM Survivors and affected communities in multiple ways³, including:

- Limited access to healthcare, education, housing and social services, particularly for asylum seekers and refugees;
- Prejudice, racial profiling and stereotyping, which fuel mistrust and hinder support;
- Institutional barriers that require Survivors to repeatedly prove their trauma and worthiness of protection.

The current political shifts across the EU and within the European Parliament have exacerbated the polarisation of political discourse and are leading to a normalised instrumentalization of female genital mutilation to feed racist, anti-migrant, Islamophobic and xenophobic narratives that can amount to hate speech. This is unacceptable and should be countered with determination.

¹ See Fundamental Rights Report, 2025 FRA

² FRA Fundamental rights report 2024; FRA, Being Black in the EU – Experiences of people of African descent, Publications Office of the European Union, Luxembourg, 2023.

³ [FGM antiracism paper Web-version.pdf](#)

For the next anti-racism strategy to be effective, it is crucial that an intersectional approach is used when shaping it. It is key to understand and acknowledge the challenges faced by racialised people and FGM-affected communities; recognise the expertise of those directly affected; encourage and set in place mechanisms for community engagement.

2. The next EU anti-racism strategy should:

1. **Recognise how racism affects the elimination of certain forms of gender-based violence such as FGM**, reflecting on how their elimination can be hindered by structural and institutional racism⁴ and what prevention measures must be in place;
2. **Call on the Council and the European Parliament to extend the current list of “EU crimes to hate speech and hate crimes** and to effectively implement Fram Council Framework Decision 2008/913/JHA
3. **Call on European and National lawmakers and policymakers to adopt an antiracist approach when shaping programmes, activities, policies and service provision** by meaningfully including racialised people in the shaping of policies that will affect them. This shall be done not only when drafting the strategy but also to monitors its implementation.
4. **Call on Member States to prioritise the respect, promotion and safeguard of fundamental rights and deprioritise any political objectives that hinder them:** the ongoing priorities centred around defence and security, growth and competitiveness have already proven harmful to the protection of fundamental rights, - for example increasing risks for people at external borders and for more vulnerable citizens⁵ - and the ongoing talks concerning the upcoming Multiannual Financial Framework (MFF) are likely to result in a weakening of civil society actors, threatening the capacity to protect and advance fundamental rights, including gender equality and the elimination of gender-based violence;

⁴ See Gender Equality Index 2021, EIGE. “In Denmark, Luxembourg and Austria, girl asylum seekers are at a higher estimated risk of FGM than the general migrant population. This highlights the importance of having gender-sensitive asylum procedures in place to prevent FGM and protect girls at risk, and to help women and girls who have undergone FGM (EIGE, 2021b). The study also demonstrates the need to strengthen sensitivity to intersecting inequalities, including through culturally sensitive approaches in sexual and reproductive healthcare systems” p.73; “Although the EU 2020–2025 anti-racism action plan calls for race to be mainstreamed into EU public policies, race is often not recorded in EU research. Based on the findings of UK research, it is very likely that the race gap in maternal mortality in the EU-27 is underexplored. Most women and girls exposed to FGM are black and face racial and gender inequalities, limiting their access to and representation in maternal healthcare.” p. 132.

⁵ https://fra.europa.eu/sites/default/files/fra_uploads/fra-2025-fundamental-rights-report-2025_en.pdf



5. **Call on the European Union to complete its accession to the European Convention on Human Rights (ECHR)**
6. **Call on the EU and all signatory Member States to fully transpose and implement the EU Directive on combating violence against women and the Istanbul Convention**, with an intersectional and anti-racist approach, fully aligning the obligations to eliminate gender-based violence with those to counter and prevent racism and discrimination on any grounds;
7. **Urge all Member States to fully comply with and make use of the Charter of Fundamental Rights of the European Union**, and encourage initiatives aimed at raising awareness on the Charter's content and provisions;
8. **Establish permanent participatory structures** to ensure consistent and regular involvement of communities in policy development, with built-in monitoring and accountability mechanisms;
9. **Call on European and National institutions to urgently tackle institutional racism.** Encourage Member States and other institutions to design internal procedures on how to identify racism and bias and adopt inclusive hiring strategies by considering the multi-layered discriminations faced by racialised people;
10. **Call for support to community leadership by funding affected communities' anti-FGM actions.** Ensure that the time and scale of the funding provided is adequate, meaning funding longer, more flexible and broader programmes, with less administrative and reporting burden. Similarly, increase financial support available to organisations working with migrants an asylum seeker, specifically on education and integration to create bridges towards educations and employment;
11. **Call for intersectional research and disaggregated data collection** to gather knowledge on the impact of racism and religious discrimination on FGM-affected populations;
12. **Emphasise the need for training and education for all relevant professionals on racism and its intersections** with gender and other forms of discriminations including awareness raising on FGM as a form of gender-based violence in formal education;
13. **Establish a screening process of the implementation of laws and policies related to FGM to prevent the potential indirect discrimination** of a particular group. For instance, review and counter the practice of misusing laws and legal tools to over-police, criminalise and stigmatise specific religious/racial communities;



14. **Encourage Member states to adopt and implement inclusive hiring policies** and remove barriers to employment such as specific administrative requirements to apply for a job in all sectors;
15. Establish monitoring and accountability mechanisms to **ensure consistent involvement of religious and underrepresented groups** in the policy development related to FGM;
16. **Create accountability mechanisms to prevent and punish racial discrimination**, ensuring that forms of gender-based violence such as FGM are not instrumentalised to stigmatise racialised affected communities. **Strengthening the monitoring of social media networks and online platforms to tackle disinformation**;
17. **Develop and support awareness-raising campaigns** in collaboration with civil society, to inform public opinion and challenge internalised bias, including the myths and misconceptions surrounding FGM-affected communities;
18. **Put in place effective measures of accountability to ensure the full implementation of the new anti-racism strategy** by all Member States and engage with the civil society to ensure monitoring the implementation at the EU and national levels.

About End Female Genital Mutilation European Network (End FGM EU)

The End FGM European Network (End FGM EU) is an umbrella network of 42 organisations working in 16 European countries who are expert on female genital mutilation (FGM). End FGM EU operates as a meeting ground for communities, civil society organisations, decision-makers and other relevant actors at European level to interact, cooperate and join forces to end all forms of FGM in Europe and beyond. We put at the heart of our work grassroots voices to influence European governments and policy-makers to work towards the elimination of FGM. We build our members' capacity, offer spaces to share expertise and develop partnerships.

While dedicated to being the driving force of the European movement to end FGM, we are equally committed to build bridges and cooperation with all relevant actors in the field of FGM both in Europe and globally. In this sense, we actively promote and foster cooperation between the European movement and movements in other regions of the world.

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Our website <https://www.endfgm.eu/>