

End Female Genital Mutilation European Network

Contribution to the consultation on the EU Civil Society Strategy

1. Introduction

The role of civil society organisations (CSOs) is critical for the good functioning of our societies; indeed, one cannot ignore the essential role played by civil society actors in providing services and protecting the rule of law and fundamental rights. This is particularly true for underrepresented and vulnerable groups, including individuals and communities affected by female genital mutilation (FGM). Civil society and community-led (voluntary) association are often the main, if not the only, barrier-free resource for support and accompaniment. Civil society actors fill in important gaps between institutions and people in situations of vulnerability, representing their interests and real needs, reducing distances that allow for access to the enjoyment of basic fundamental rights and services.

In an increasingly shrinking civic space¹, with recurrent attacks and threats to the work of CSOs, the expertise and in-depth knowledge of CSOs and Human Rights Defenders (HRDs) needs to be recognised and supported. In particular, CSOs and HRDs working on topics such as women's rights, sexual and reproductive health and rights (SRHR), gender equality, LGBTIQ+ rights etc. are at an increased risk of facing backlash and attacks including from institutions. For these reasons, **we welcome the initiative by the European Commission to adopt an EU Civil Society Strategy reaffirming the key role played by CSOs** and the need to preserve and protect an independent and working civic space. For the Civil Society 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 people carrying multiple identities such as FGM-affected communities; recognise the expertise of those directly affected; encourage and set in place mechanisms for better community engagement.

2. Our recommendations

Pillar 1: Support and overall environment

In an environment that is increasingly challenging for CSOs² and in particular for organisations working on gender equality, SRHR and the rights of minority groups it is at the utmost important that the new strategy builds a strong support system for CSOs.

¹ As reported in the latest report of the Civic Forum, civic space deterioration continued to worsen since 2019 <https://civic-forum.eu/wp-content/uploads/2024/05/CIVIC-SPACE-REPORT-2024-HORIZONTAL-ANALYSIS.pdf>

² Council of Europe INGO conference – study of the Expert Council on NGO Law “Stigmatisation of non-governmental organisations in Europe (2024)

We call on the European Commission to present a strategy that:

- Calls on all EU institutions and Member States to ensure adopting and implementing measures that **support civil society actors in continuing their role activities in complete safety and independence** and shield CSOs from any intimidation or attacks.
- **Calls for intersectional research and disaggregated data collection** to gather knowledge on the impact of the current political landscape on the civic space to better understand the needs of CSOs.
- **Ensures sustainable long-term flexible funding** for CSOs, including a call to provide operating grants and long-term core funding to CSOs to ensure they can develop, grow and deliver on their mission.
- **Makes EU funding accessible to all organisations in particular grassroots, volunteer-based and smaller organisations** which often lack the administrative capacity to meet complex requirements and are often sidelined.
 - Opportunities must be well-publicised, application processes simplified and support for applying CSOs provided.
 - Funding schemes should be agile and flexible, with easier reporting requirements to ensure organisations can participate regardless of their size and capacity ensuring more diverse and vibrant civil society.
- **Creates specific funding scheme to fund intersectional community-led actions against gender-based violence such as FGM** through long-term, flexible and accessible grants, reducing administrative burdens and using regranting mechanisms to reach grassroots organisations

Pillar 2: Protection

In a context of increasing attacks on CSOs including unfounded scrutiny of NGO funding and activities at the European and National levels, the Strategy must ensure the protection of CSOs and HRDs.

We call on the European Commission to present a Strategy that:

- **Protects CSOs from political attacks.** The Strategy should secure the role played by CSOs to avoid undermining its watchdog role and weaken democracy and human rights protections.
- **Adopts an EU-level framework for the safeguarding of civil society and civic space** aiming at monitoring, preventing and responding to attacks against CSOs, activists and human rights defenders including institutional attacks within the Union. For this mechanism to be effective it should include early
 - Warning systems and rapid response measures;
 - Coordinated action across the EU with institutional funding for local actors who are often first responders;

- Dedicated support for organisations under threat including access to emergency funds.
- Accountability mechanism to address unjustified institutional attacks and restrictions to the civic space
- Puts in place a **mechanism to ensure inclusivity, accessibility, and intersectionality** in protection
 - In its conception, it must apply an intersectional lens to address multiple layers of discrimination and vulnerability; it must be developed with and for CSOs, ensuring a broad and meaningful participation rather than tokenistic consultation.
 - Be gender and culturally sensitive, adapting responses to legal status, identity and specific needs;
 - Guarantee accessibility, including multilingual availability, disability inclusion and simple, low-burden procedures;
 - Provide clear entry points to trigger rapid responses such as anonymous hotlines

Pillar 3: Engagement

For policies to match the needs of those impacted or targeted by them it needs to include a robust, inclusive and systematic civil dialogue. Engaging with experts, frontliners and CSOs is at the heart of the functioning of the Union as stated in article 11 of the Treaty on the European Union.

We call on the European Commission to present a strategy that

- Includes a **mechanism for meaningful and systematic civil society consultation** at both EU and national levels with a unified structure and format for engagement to guarantee consistency, inclusivity, and transparency in decision-making processes.
 - Ensuring continuous engagement of CSOs throughout policy processes, not only when specific expertise is needed but throughout the entire policy cycle. This should include design, implementation, monitoring and evaluation. While taking into consideration the limited capacity of many CSOs and adapt engagement accordingly.
- **Ensures inclusivity, accessibility and diversity throughout the consultation processes** by engaging a broad range of CSOs. Including those working on transversal issues and working across different issues to avoid silos.
- Pays **special attention to small organisations, grassroots and community-based actors** and those representing underrepresented groups including FGM-affected communities.
 - Introduction of a formal system to engage with FGM-affected communities in all actions concerning them [as seen in Portugal and the Netherlands](#);
 - Processes must accommodate language barriers, limited capacity and geographical constraints to ensure meaningful participation of all stakeholders.
- **Improves transparency and accountability of consultation processes** by clearly communicating next steps, explaining how input is used and providing feedback to participants. The Strategy should encourage Member States to do the same.

- Proposes new pathways **for increased collaboration between EU and partner-countries-based civil society organisations** striving towards gender equality globally, promoting exchanges, knowledge-sharing and co-creation of transcontinental collaborations – in particular towards achieving the elimination of FGM.
- **Commit to regularly and meaningfully consult civil society organisations throughout the Strategy's lifecycle** and encourage Member States to do the same.
 - Put in place effective measures of accountability to ensure the full implementation of the new Civil Society strategy by all Member States and engage with the civil society to ensure monitoring the implementation at the EU and national levels.

Transversal asks

- **Monitor and put in place the already existing legislative tools** that include protection, support and engagement with the civic space. To achieve this, the Strategy should
 - Call on the European Union to complete its accession to the European Convention on Human Rights (ECHR)
 - Urge all Member States to fully comply with and make use of the Charter of Fundamental Rights of the European Union.
 - 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 which both includes specific protection for CSOs.
 - Guarantee the systemic harmonisation between EU policies, in particular with the Anti-Racism Strategy, the LGBTQI Strategy, the recommendations on combating and preventing anti-Muslim hatred and the Gender Equality Strategy.



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.

For any further information, please contact Xheni Dani, Policy & Advocacy Coordinator, at xdani@endfgm.eu or visit our website <https://www.endfgm.eu/>