

End Female Genital Mutilation European Network

Contribution to the 2026-2030 Gender Equality Strategy Consultation

1. Introduction

As we approach the closing of the current EU Gender Equality Strategy 2020-2025, we recognise and welcome the progress achieved, such as dedicated funding for gender equality and ending gender-based violence (GBV) in the Citizens Equality Rights and Values programme, the EU accession to the Istanbul Convention and the adoption of the Directive to combat violence against women and domestic violence. We acknowledge in particular the increased recognition and prioritisation of the elimination of female genital mutilation (FGM), as a form of GBV.

However, the reality across the EU shows that gender inequality and GBV persist and, in some cases, are deepening. EU monitoring institutions confirm that progress has been stagnating, and there have also been some regression, particularly in areas such as work-life balance, access to healthcare, and safety. As highlighted by the Fundamental Rights Agency (FRA), the persisting high rates of GBV and systemic gendered barriers can prevent women from accessing justice, safety, and equal opportunities.

In addition, the gendered obstacles are aggravated by other forms of discrimination, targeting for example racialised women who also come from FGM-affected communities. Moreover, over the past five years we have witnessed a growing backlash against civil society and against gender equality, and a worryingly well-resourced movement founded in anti-rights and hateful ideologies, which is already having devastating impacts on sexual and reproductive health and rights (SRHR).

Aligned with the commitments made in the Roadmap for women's rights, **we call on the EC to set forward an ambitious new Gender Equality Strategy**, rooted in human-rights principles, with an intersectional and inclusive approach, able to respond to the specific challenges of our times and **built to counter the backlash** we're seeing in Europe and beyond **and prevent the proliferation of anti-rights movements and powers**. The strategy must build on previous achievements and set the basis for meaningful, systemic transformation aimed at achieving real equality for all women in their diversity.

The End FGM European Network calls on the European Commission to **prioritise prevention, intersectionality, survivor-centred care and support, community engagement, training of professionals, cooperation with civil society and structural change** in the new EU Gender Equality Strategy.

2. Our recommendations

To strengthen the EU role as a regional and global leader for gender equality, we call on the European Commission to present a strategy that:

- Fully aligns with the commitments made in the EU Roadmap for women's rights and overcomes its shortcomings;
- Sets out a strong accountability mechanism for Member States, calling for the full transposition and tracked implementation of the EU Directive on combating violence against women and domestic violence;
- Guarantees 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;
- Calls on the Council and EP to add gender-based violence, which comprises FGM, to the list of Eurocrimes included in Article 83 TFEU;
- Confirms the imminent adoption of the long-awaited European Commission Recommendation on combating and preventing Harmful Practices with provisions explicitly tackling all forms of genital mutilation;
- Engages to adopt a European Commission Recommendation encouraging Member States to implement comprehensive sexuality education aligned with international standards, such as the UNESCO Technical Guidance, and facilitates the exchange of best practices among Member States and civil society experts in this field.
- Calls for the EU's accession to the European Convention on Human Rights;
- Proposes a plan for accelerating the realisation of the 2030 Sustainable Development Goals (SDGs) Agenda, particularly SDG 5 and target 5.3 on ending harmful practices such as FGM and early and forced marriage.
- Calls on Member States to match their commitments to the SDGs and the Generation Equality;
- Calls on the EU's external action to promote and uphold human rights, gender equality, SRHR and the commitments made under the Istanbul Convention and CEDAW;
- 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 and EFM.

Focusing on the effective mainstreaming of gender equality in all EU policies, the next Gender Equality Strategy must:

- Reflect the specific needs and rights of all women and girls, especially those on the move or with precarious residency status to ensure equal access to their fundamental rights, including education, healthcare, work opportunities and other support services.
- Establish firewalls to allow undocumented women to report acts of violence or access support services without fear of losing their rights or facing prosecution.

- Call on Member States to guarantee the EU Pact on Migration and Asylum fully respects European and International human rights standards and integrates a gender-sensitive approach addressing the needs of women and girls on the move, particularly survivors or persons at risk of FGM or GBV;
- Make **gender equality a core priority of the EU external action**, including through an ambitious and well-resourced renewal of the Gender Action Plan IV as well as ambitious gender targets in the MFF 2028-2034 proposal;
- Call for increased financial support available for women's rights organisations, including those specifically supporting migrants and asylum seekers on education, protection and integration. Ensure resources are accessible, long-term and flexible to allow organisations to pursue their missions.

For sustainable progress towards gender equality, the Strategy needs to:

- Acknowledge the disrupting effects of anti-gender, masculinist and anti-rights propaganda, leading to destructive polarisation based on gender and hateful ideologies based thereon,
- **Condemn and seriously address any attacks on women's rights and gender equality** and call on EU institutions to follow a **rigorous zero-tolerance policy on hate speech and instrumentalization of GBV, FGM, women's rights** to feed illiberal and discriminatory agendas;
- Emphasize that **fundamental rights must take precedence over other political aims** such as defence, security or competitiveness: none of these priorities should risk neglecting progress towards gender equality. On the contrary, **all other goals should serve the purpose of achieving equality and full enjoyment of human rights for all**;
- Monitor the state of the fight against GBV in the EU and in all Member States with a robust response mechanism to address any signs of backsliding;
- Call on Member States to explicitly condemn and call out the rise of anti-rights, racist misogynistic narratives and declare preventing the backlash against gender equality a core political priority.
- **Lay out key steps to respond to the real needs of GBV and specifically FGM Survivors**
- Call on Member States to ensure all **Survivors have access to** justice and legal advice, SRHR, holistic psycho-social and other social **support services** without facing discrimination;
- Call on Member States to **train relevant professionals** across sectors (health, education, law enforcement, justices) to understand and effectively respond to FGM, in cooperation with civil society and by adopting successful methods developed by specialised/grassroots/survivor-led organisations¹
- Call on Member States to integrate FGM, early and forced marriage and other so-called harmful practices awareness into formal education curricula and public campaigns.

¹ One example is the End FGM E-Campus platform, co-funded through CERV: <https://endfgm-ecampus.eu/>

The Strategy must also go further in its deployment of intersectionality and mainstreaming:

- Maintain and strengthen intersectionality as a guiding tool for effective policy coordination and implementation;
- Set out clear plan to ensure policy making and implementation have an intersectional approach. Commit to issue implementation guidelines rooted in human rights and intersectionality expertise and developed in collaboration with regional and grassroots civil society and community-led organisations;
- Recognise in the Strategy that women and girls affected by FGM sit at the intersection of multiple forms of discriminations – gender, race, migration status, religion, socio-economic background and that measures included in this Strategy ensure tailored measures for these groups, including access to health, justice, and protection;
- Mainstream a feminist and intersectional approach across all EU (both internal and external), programme, action plans, monitoring and funding;
- Explicitly reject exclusionary narratives to ensure gender equality efforts are inclusive of all women, in all their diversity and encourage Member States to implement similar measures at the national level.

One of the ways to practice intersectionality is through effective and meaningful inclusion and co-creation: the strategy must highlight the need for community engagement and the key role of civil society:

- Institutionalise mechanisms for meaningful and systematic participation of underrepresented communities including FGM-affected communities in all stages of the policy making and implementation processes;
- Fund community-led actions against FGM through long-term, flexible and accessible grants, reduce administrative burdens and use regranting mechanisms to reach grassroots organisations notably through regranting schemes that alleviate financial and administrative burdens on smaller organisations;
- Affirm in the Strategy the critical role of the civil society in defending gender equality and human rights. Ensure a safe and enabling environment particularly for those supporting marginalised groups such as FGM survivors, LGBTIQ+ people, migrant women, women with disabilities etc.;
- Support the watchdog role of CSOs working on gender equality and women's rights institutions and their right to hold institutions accountable, promote rights, and defend the Union's fundamental values. This includes ensuring that supported activities create and protect civic space for organisations and activists to engage in public debate, participate in policy processes, and bring their expertise to contribute meaningfully to the development and implementation of EU policies;
- Commit to regularly and meaningfully consult civil society organisations throughout the Strategy's lifecycle and encourage Member States to do the same;
- Ensure the upcoming EU Civil Society Strategy includes the same standards of intersectional approach and specific protections for women's rights organisations and human rights defenders.

Finally, for measurable results, the Strategy must rely on adequate resources, strong data collection and monitoring mechanisms. Therefore, the EC should:

- Call on MS to invest in intersectional research and disaggregated data collection to improve understanding of FGM prevalence and GBV to guide evidence-based policy;
- Establish a robust monitoring and accountability mechanism to oversee the implementation of the new Strategy, with regular reporting and consequences for non-compliance to hold into account and monitor Members States implementation of the Strategy with a specific focus on marginalised groups.
- Ensure sufficient, flexible, sustainable and long-term resources allocated to the implementation of the objectives set out in the Strategy; call for a dedicated budget line for feminist organisations in the next MFF
- Mainstream gender across all stages of the EU budget cycle through gender budgeting;
- Maintain and strengthen the CERV programme as a standalone programme under direct management of the Commission, increase the budget allocated to it and safeguard advocacy, watchdog activities and grassroots participations;

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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