

Ambassador Carsten GRØNBECH-JENSEN

Permanent Representative

Permanent representation of Denmark to the EU

Rue d'Arlon 73, 1040, Brussels

E: brurep@um.dk

CC: Birgit Peters, Secretary to Amb Carsten Grønbech-Jensen
Anne Maria Madsen, Counsellor development, migration and Africa
Emma Holm Sørensen, Justice attaché FREMP
Anders Schlütter-Hvelplund, Home Affairs Attaché
Maria Cecilie Krastrup, Home Affairs Attaché
Morten Nykjær Krøjgaard, Home Affairs Attaché
Esben Asmussen, Social Affairs Attaché
Frida Dyred Krogshede, First Secretary EMU, EU budget, financial services custom and taxation policy

Brussels, 15 July 2025

Re: Recommendations to the Danish Presidency of the Council of the European Union

Dear Mr. Ambassador,

I am writing to you on behalf of the [End Female Genital Mutilation European Network](#) (End FGM EU), following the release of the Danish Presidency programme. Your Presidency comes at a crucial moment for the European Union (EU), as **we are entering negotiations for the next Multiannual Financial Framework (MFF), the future of key equality strategies and the implementation of two major policies:** the Pact on Migration and Asylum (the Pact) and the Directive on combating violence against women and domestic violence (the Directive).

As a Network of 42 civil society organisations (CSOs) across 16 European countries, **we are committed to eliminating female genital mutilation (FGM) and supporting Survivors and persons at risk.** We advocate for a Europe and a world free from violence, where gender equality and human rights are not only values but realities.

We particularly welcome Denmark's stated commitment to human dignity, freedom, democracy, the rule of law, and respect for fundamental rights. Yet we also note important gaps, particularly in relation to gender-based violence, intersectionality, access to health and support services and the specific needs of vulnerable groups, including migrant women and those affected by harmful practices such as FGM and an acute prioritisation of competitiveness and defence.

A 'strong Europe in a changing world' cannot be accomplished at the expense of human dignity and fundamental rights. Women's rights and gender equality are facing a universal backlash, and extreme discourses have been normalized, targeting sexual and reproductive health and rights, racialised and LGBTIQ+ people, migrant communities, victims

of gender-based and domestic violence, among others. We urge the Danish Presidency to **maintain human rights at the core of its action for an increasingly credible role of the EU as a global leader by example.**

Based on the core values of the EU, the Union's commitments and the Council Conclusions *"Preventing and combating all forms of violence against women and girls, including female genital mutilation"* of June 2014, End FGM EU calls on the Presidency and the Council to:

1. **Prompt all Member States to prioritise equality and effectively address Gender-Based Violence including FGM, with a focus on prevention and protection;**
2. **Ensure granting of international protection aligns with fundamental human rights standards;**
3. **Increase and improve data collection specifically on gender-based violence and FGM;**
4. **Increase civil society and community engagement and recognise their core role in upholding the Union's values;**
5. **Work towards a new MFF that prioritises equality and ending gender-based violence;**
6. **Reaffirm the EU's external human rights commitments.**

Annexed to this letter you will find our detailed recommendations.

We appreciate the opportunity your Presidency offers to make real progress on building a more equal, safe, and inclusive Europe. We remain ready to collaborate with you to ensure that EU policies deliver for women and girls, uphold the rights of Survivors, and address the root causes of gender inequality.

We would welcome the opportunity to meet and exchange with your team to explore how we can work together during your Presidency Semester.

Wishing the Danish government, a fruitful and constructive Presidency Semester, we reiterate our readiness to support you and cooperate to achieve our common goals.

Yours sincerely,



Nejma Sayeh, Policy and Advocacy Officer, **End FGM European Network**

On Behalf of Ms. Marianne Nguena Kana, Director, **End FGM European Network**

Annexe

Based on the core values of the European Union (EU), the Union's commitments and the Council Conclusions *"Preventing and combating all forms of violence against women and girls, including female genital mutilation"* of June 2014, End FGM EU calls on the Presidency and the Council to:

1. Prompt all Member States to prioritise equality and effectively address Gender-Based Violence including FGM, with a focus on prevention and protection;

While we welcome the reference to equality including through the adoption of the directive on equal treatment we regret the lack of detail on gender-based violence and intersectionality in the priorities which are pre-requisite to a *strong Europe in a changing world*.

We urge the Danish Presidency to

- Ensure full implementation of the Directive to efficiently tackle FGM, we insist that the EU, including through this Directive, must do more to increase measures on the prevention of gender-based violence and the provision of specialised holistic support services to all Survivors.
- Push for Member States to ratify and fully implement the Istanbul Convention without delays.
- Support the Commission in finalising and publishing the long-awaited recommendation on preventing and combatting harmful practices, including FGM.
- Reinforce efforts for the renewal and ambition of the EU gender Equality Strategy, the LGBTQI+ strategy, the Anti-Racism strategy and Civil Society Strategy, ensuring a clear follow-up framework and strong mechanisms.
- Work with the European Commission and Member States to ensure the revision and effective transposition and implementation of Directive 2012/29/EU (Victims' Rights Directive) in all EU Member States. In particular to go beyond the Council's adopted position and explore the propositions made by the Commission and the Parliament and affirm its commitment to all victims of crimes in Europe¹.
- Prioritise access and enjoyment of full sexual and reproductive health and rights as well as mental health rights, with a holistic approach to SRHR services, that includes mental health support, especially for Survivors of gender-based violence.
- Prevent through the promotion of non-discrimination and gender-mainstreaming: a Europe free from discrimination and racism through an intersectional approach to tackle the enduring issues of racism, xenophobia and islamophobia, all of which negatively affect the mission of ending FGM, reinforcing stereotypes and the marginalisation of affected communities.

2. Ensure granting of international protection aligns with fundamental human rights standards

While the priorities include the implementation of the Pact, we are concerned by the absence of reference to the fundamental rights of people on the move, which should be at the cornerstone of any migration policy. Although the Pact has been adopted with limitations which we condemn, going forward, we urge the Danish Presidency to

- Ensure a human rights-based, gender, age and culturally sensitive asylum system. It is fundamental that all migration and asylum policies take into consideration the human rights of people migrating, in particular girls and women, and their right to receive international protection when affected or at risk of being affected by FGM in the countries they are fleeing.
- Ensure the Pact's implementation and interpretation is carried out in full compliance with European and international law and fundamental rights standard, in line with commitments to promote the adherence to international law and respect for human rights, and to strive for the Union's accession to the European Convention on Human Rights.

3. Increase and improve data collection specifically on gender-based violence and FGM

We continue to face a lack of robust and comparable data on FGM and other forms of GBV, as highlighted in the Gender Equality Index². The data assessing the prevalence of violence against women is scarce, outdated and fails to reflect the full extent of the situation.

- We ask the Danish Presidency to lead efforts toward establishing an EU-wide methodology for data collection, particularly in relation to asylum claims based on GBV and FGM by leading efforts to establish a common data collection methodology.

4. Increase civil society and community engagement and recognise their core role in upholding the Union's value

Civil society plays an indispensable role in advancing EU values and supporting vulnerable populations, in particular community-based engagement is crucial to better understand the need of those most affected by FGM.

In a civic space increasingly shrinking, we urge the Danish Presidency to

- Promote structured dialogue and meaningful youth and community engagement
- Increase core and flexible funding to grassroots organisations, especially those working with marginalised groups such as FGM affected communities
- Embed civil society participation in the implementation of the MFF and EU external actions

5. Work towards a new MFF that prioritises gender equality and ending gender-based violence

We acknowledge the strong emphasis placed on the MFF and competitiveness in your programme. However, budgetary planning must also align with the EU's human rights and equality objectives, competitiveness should not be prioritised over fundamental rights. Therefore, we urge the Danish Presidency to:

- Prioritise human rights, gender-equality and ending all forms of GBV emphasising FGM prevention and survivor support, aligned with the EU's priorities including the Istanbul Convention.
- Ensure adequate resources are dedicated to ending gender-based violence and promoting sexual and reproductive health and rights by ensuring the next MFF prioritise vital programmes such as the Citizens Equality Rights and Values

programme, ensuring it remains a standalone programme, under direct management of the Commission and increase the resources allocated to it.

- Mainstream gender across all budget lines, from humanitarian aid to education and climate.

6. Reaffirm the EU's external human rights commitments

We welcome the references to the EU's global role and partnerships with other regions, particularly with the African Union and the implementation and ratification of the Samoa Agreement including the provision on FGM. We call on the Danish Presidency to:

- Work with other Member States, EU institutions and stakeholders towards the realisation of the 2030 Agenda. There is a need to increase investments specifically targeted at SDG 5.3 (ending harmful practices including FGM and child, early and forced marriage) if we want to achieve this goal in the few remaining years there is still a 2.1 billion funding gap to be filled.
- Ensure the EU's external action upholds human rights, gender equality, and the commitments made under the Istanbul Convention and CEDAW.
- Lead efforts to ensure the EU accedes to the European Convention on Human Rights, reaffirming the Union's global human rights leadership