

HE Ms Aineal O'Donoghue

Permanent representative of Ireland to the European Union

Rue Froissart 50, 1040 Brussels, Belgium

CC:

Heidi Loughheed (Counsellor, Asylum & Migration) heidi.loughheed@dfa.ie

Brendan Bruen (Counsellor, Judicial Cooperation in Criminal Matters) brendan.bruen@dfa.ie

Nessa McKeivitt (First Secretary, Fundamental Rights) nessa.mckeivitt@dfa.ie

Richard Quilliam (First Secretary, Equality) richard.quilliam@dfa.ie

Peter O'Connor (First Secretary, Human Rights - COHOM) peter.oconnor@dfa.ie

Mary McCarthy (First Secretary, Development Cooperation) mary.mcarthy@dfa.ie

John Laffan (Counsellor, JHA Coordinator) john.laffan@dfa.ie

Lisa Hughes (Assistant principal officer Equality and Gender Equality Unit)

lisa.hughes@dcde.gov.ie

Eugene Lennon (First Secretary, Health) eugene.lennon@dfa.ie

Dympna Boyle (First Secretary, Health) dympna.boyle@dfa.ie

Brussels, 18 June 2026

Recommendations to the Irish Presidency of the Council of the European Union

On behalf of the End Female Genital Mutilation European Network (End FGM EU), we write to you as Ireland assumes the Presidency of the Council of the European Union for the second half of 2026. As a network of 45 civil society organisations across 17 European countries, including one member organisation in Ireland (Akina Dada wa Africa (AkiDWA)) we remain steadfast in our commitment to eliminating Female Genital Mutilation (FGM), supporting FGM Survivors, and protecting persons at risk.

We have carefully reviewed the Irish Presidency programme, *"Ní neart go cur le chéile / Strength with Unity,"* with specific attention to its three pillars: **Competitiveness, Values, and Security**. We welcome the explicit commitment to the **Union of Equality, the Rule of Law, and initiatives such as the Gender Equality Strategy and Anti-Racism Strategy**. In particular, we endorse the Presidency's focus on the new Gender Equality Strategy (2026 - 2030) and the **upcoming joint declaration on gender equality** to be released in November alongside the **Lithuanian and Greek Presidencies**. We also appreciate the recognition of gender equality in a modern, digital society.

However, while the Presidency rightly posits that "equality strengthens competitiveness," this ambition is significantly weakened if the specific forms of **intersectional discrimination** faced by **migrant women and girls fleeing FGM** are excluded from these strategic goals. Currently, the programme lacks specific, actionable measures to address the **needs of FGM Survivors and girls at risk**. Without concrete actions addressing the **intersection of racism, migration status, and gender-based violence**, the "Union of Equality" risks failing to reach the most vulnerable. Furthermore, we note the absence of **hate speech and the fight against hate**

crimes as core priorities, despite the increasing backlash against women's rights and the rise of racist and anti-migrant discourses.

While we welcome the reference to **equality, child rights, and fundamental rights**, we regret the lack of detail regarding **gender-based violence (GBV) and intersectionality**. These are not merely buzzwords but prerequisites for ensuring social justice. The current prioritisation of competitiveness and defence, contrasted with the **non-prioritisation of GBV and access to health services for vulnerable groups**, leaves a significant gap. **FGM Survivors often face multiple forms of discrimination, particularly when accessing health services**. To truly deliver on "**Strength in Unity**" every woman in her diversity, especially migrant women and those affected by gender-based violence, must be central to the agenda. **Intersectionality must be a core value, not just a concept**.

"**Strength in Unity**" cannot be achieved without guaranteeing human dignity and fundamental rights for all. We observe a **global backlash against women's rights**, where extreme discourses have been normalised, targeting the most vulnerable. This includes **increased attacks on civil society, racialised and LGBTQIA+ communities, migrant groups, and survivors of gender-based and domestic violence**.

We have also reviewed the **18-month Trio Programme (Ireland, Lithuania, and Greece)** - which explicitly designates **gender equality and social cohesion** as a 'horizontal priority' while pledging to **uphold fundamental rights** within the 'European Democracy Shield' and the **Pact on Migration**. This provides a critical mandate for your Presidency to ensure that the implementation of the **Pact on Migration and Asylum** fully integrates **intersectional protections for FGM Survivors, preventing the weaponization of migration from undermining the very security and human rights standards the Trio has committed to defend**.

We urge the Irish Presidency to uphold EU commitments to protect and promote **fundamental rights**. We call for the acceleration of EU-wide policies that place **human rights at the core of its actions, ensuring the EU maintains its credibility as a global leader by example**. Below are recommendations to your Presidency on our behalf and our network:

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 asylum and migration policies uphold fundamental human rights standards.**
3. **Increase and improve data collection specifically on gender-based violence and FGM through** the establishment of a mandatory, harmonised **EU-wide data collection methodology** to address the current lack of FGM statistics.
4. **Increase civil society and community engagement and recognise their core role in upholding the Union's value.**
5. **Work towards a new MFF that prioritises gender equality and ending gender-based violence.**
6. **Reaffirm the EU's external human rights commitments.**

Detailed recommendations on these points follow in the Annex below.

The Irish Presidency has a unique opportunity to demonstrate that values and security are not mutually exclusive. 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 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 with your Presidency's team early in the semester to discuss these recommendations further and agree concrete follow-up steps. Wishing the Irish government a fruitful and constructive Presidency Semester, we reiterate our readiness to support you and cooperate to achieve our common goals.



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

Annex

End FGM EU calls on the Irish 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.

We welcome the reference to equality, gender equality, and the support for the new EU Anti-Racism Strategy, child rights, and fundamental rights. However, we regret the lack of detail on gender-based violence and intersectionality, which are prerequisites to ensure social justice and equality.

We urge the Irish Presidency to:

- Ensure full implementation of the **Directive on combating violence against women and domestic violence** 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 FGM Survivors**.
- Push for Member States to fully implement the **Istanbul Convention** without delays and to keep an attentive eye on the ongoing **baseline evaluation of the implementation of the Convention by the EU conducted by GREVIO**.
- Support the implementation of the new **EU Gender Equality Strategy (2026–2030)** and the new **Anti-Racism Strategy (2026–2030)**, ensuring a clear follow-up framework and strong mechanisms.
- Follow up with Member States to ensure the full implementation of the new policy framework, including the revised **EU Victim's Rights Directive**, the **LGBTQI+ Strategy (2026–2030)**, the **Gender Equality Strategy (2026–2030)**, the **Anti-racism Strategy 2026–2030**, and the **new Democracy Package**.
- Prioritise access to full **sexual and reproductive health and rights (SRHR)** as well as **mental health rights**, with a holistic approach that includes mental health support for survivors of GBV.
- 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 asylum and migration policies uphold fundamental human rights standards

While the priorities include the implementation of the **Pact on migration and asylum** in respect of fundamental rights, the Pact has been adopted with limitations which risk undermining safeguards of basic human rights of asylum seekers and migrants, including FGM-affected individuals. We urge the Irish 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. Improve protection and asylum pathways for women and

girls at risk of FGM and enhance cross-border prevention, data collection, and professional training across Member States.

- 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, the Union's accession to the **European Convention on Human Rights**. Similar approach must be adopted in the framework of the new **Common European System for Returns** whose content questions its alignment with the highest human rights standards.

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 Index¹. 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 Irish 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. While we welcome the commitment to implement the **European Democracy Shield** and the **EU strategy for Civil Society**, in a civic space increasingly shrinking, we urge the Irish Presidency to:

- Promote structured dialogue and meaningful youth and community engagement.
- Ring-fence resources for organisations that are dedicated to ending gender-based violence and promoting SRHR.
- Increase core and flexible funding to grassroots and community-based organisations, especially those working with marginalised groups such as FGM affected communities.
- Embed civil society participation including FGM survivor- and migrant women-led organisations in EU decision-making.
- Ensure the newly adopted first Civil Society strategy is implemented by all Member States and encourage stakeholders to go above and beyond its content to promote a thriving civil society.

¹ [Gender Equality Index 2025: Sharper data for a changing world | European Institute for Gender Equality](#)

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, we highlight that budgetary planning must also align with the EU's human rights and equality objectives.

Therefore, we call on the Irish Presidency to:

- Increase the overall AgoraEU Budget, reject the proposed 300-million-euro reduction proposed in the first negotiating box proposed by the Cyprus Presidency which represents a 4% cut compared with the Commission's initial proposal. We urge the Irish Presidency, to align with the Parliament's position to raise the total AgoraEU budget to 10.72 billion euro, which will represent only 0.5% of the entire MFF.
- Safeguard the CERV+ strand within AgoraEU. Implement earmarked funding per strand and maintain the 41.9% share proposed by the Commission and the Parliament. This will ensure predictable and adequate allocations, preventing the fragmentation of resources and allowing organisations to plan long-term projects effectively which is extremely important considering the growing challenges to the protection of EU values.
- Prioritise human rights, gender-equality and ending all forms of violence in the next MFF emphasising FGM prevention and survivor support, aligned with the EU's priorities including the Istanbul Convention.
- 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 mention of the European Convention on Human Rights and references to the EU's global role and partnerships with other regions. We call on the Irish Presidency to:

- Lead all 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 filled².
- Ensure that **Country-of-Origin Information (COI)** used in external relations and asylum decisions takes into account the specific safety needs of women and girls, LGBTIQ+ people, and minorities, recognizing that a country cannot be deemed "safe" if FGM remains persistent in parts of its territory.
- Ensure to include FGM and gender-based violence prevention and support to Survivors in the Union's crisis response. These areas are often deprioritised in the

² United Nations Human Rights Council adopts new resolution on the elimination of Female Genital Mutilation/Cutting (FGM/C) at its 59th session | End FGM

Union's humanitarian action despite the acute needs in emergency situations as in Sudan³.

³ [Urgent call for EU action to protect women and girls in Sudan | End FGM](#)