

# Submission to Consultation on EU Action Plan for Gender Equality and Women's Empowerment in EU External Action (GAP IV)

30 April 2026

## 1. Executive Summary

Equality between women and men is a fundamental principle of European Union law and a core objective of EU external action, as recognised in international frameworks and reaffirmed in EU policy commitments. The forthcoming EU Action Plan for Gender Equality and Women's Empowerment in External Action 2028–2034 (GAP IV) is being developed at a critical moment, as global progress on women's rights remains slow, uneven, and increasingly under threat. Women and girls, particularly those in conflict-affected, humanitarian, and migration contexts, continue to face disproportionate levels of violence, exploitation, and exclusion, while rising authoritarianism, anti-women's-rights movements, and funding cuts are actively undermining existing protections.

Despite the EU's commitments and the progress made under previous frameworks, significant gaps persist in how equality of women and men is operationalised across external action. As highlighted in this submission, these gaps are structural. EU policies in areas such as migration governance, border externalisation, digitalisation and economic cooperation continue to operate in ways that expose women, particularly migrant, displaced and marginalised women to heightened risks of violence and exploitation. At the same time, conceptual inconsistencies, including the conflation of sex and gender, and fragmented, inconsistent and contradictory funding approaches weaken the effectiveness of interventions, limit accountability and at times produce counter-productive effects for women's rights. As a result, there is a growing disconnect between political commitments to equality of women and men, and the realities experienced by women in contexts shaped by EU external engagement.

GAP IV therefore represents a critical opportunity to move beyond declaratory commitments and establish a coherent, human rights-based, women's rights informed, and sex-explicit framework for EU external action. This requires addressing the structural drivers of inequality, ensuring policy coherence across all areas of external engagement and embedding enforceable standards for the protection of women and girls as a clearly defined and ring-fenced category, including in migration, humanitarian, digital and development contexts. It also requires prioritising sustained support for women-led, including migrant-women-led organisations and ensuring substantive, as opposed to tokenistic participation in decision-making processes. Without such a shift, GAP IV does not only risk reproducing existing limitations but reinforcing them, rather than delivering the transformative change necessary to achieve equality of women and men and ensure the full enjoyment of human rights by women. **The EU has a critical role to play as a global actor in safeguarding women's and girls' rights and ensuring that its policies, partnerships, and investments do not inadvertently reinforce harm.**

## 2. Sex and gender

Across EU external action, including development cooperation, humanitarian aid, migration partnerships and political dialogue with third countries, there is an persistent and deeply entrenched conceptual conflation between sex and gender. This has direct consequences for the design, targeting and effectiveness of interventions aimed at women implemented outside the EU. While gender equality is recognised as a fundamental value, EU external policies and programmes do not consistently maintain a clear analytical distinction between sex as a material reality and gender

as a social construct. This lack of clarity weakens the capacity of EU external action to identify and respond to the specific forms of discrimination and violence experienced by women as a sex-based group, particularly in contexts of conflict, displacement and migration.

This gap has practical implications across external action. In humanitarian settings, migration governance and anti-trafficking interventions supported by the EU, women's exposure to violence, including sexual violence, exploitation and trafficking is structured by sex. When this is not explicitly recognised, programme design becomes less targeted, data collection is inconsistent or non-disaggregated and accountability mechanisms are non-enforceable. In cross-border contexts and partnerships with third countries, the absence of sex-specific frameworks leads to inconsistent standards, particularly where protection systems are already fragile. As a result, EU-funded actions risk failing to adequately protect women or to measure outcomes affecting them, despite international commitments such as the Beijing Declaration and Platform for Action.

GAP IV should ensure that sex is consistently used as a category of analysis across all areas of EU external action, including development programmes, migration cooperation, humanitarian interventions and digital and economic partnerships. It should require systematic collection and use of sex-disaggregated data in all external programming and reporting systems, including in partner countries and EU-funded operations. Conceptual clarity should be embedded in indicators, funding allocations and programme design to ensure that women remain a clearly identifiable and protected group, particularly in high-risk contexts such as migration routes, border zones and conflict-affected settings.

### 3. Financing for women's rights in EU external action

Across multiple regions, women's and girls' rights are under sustained and, in some cases, accelerated threat. Violence against women, including domestic violence, sexual violence, and harmful practices such as female genital mutilation, remain pervasive and is often underpinned by weak legal protections, lack of enforcement and deeply embedded discriminatory norms.

In certain contexts, state structures themselves contribute to or tolerate systemic oppression of women and girls. These trends point not only to persistent inequality but to an active rollback of rights. In this context, GAP IV should move beyond reactive measures and adopt a more structural approach, addressing impunity, strengthening institutions, and supporting long-term normative change.

**There is also a need to reassess the effectiveness of existing diplomatic and political engagement tools. Where traditional approaches have yielded limited results, the EU should consider reinforcing accountability mechanisms, including more robust conditionality and targeted support for local actors advancing women's rights.**

Within EU external action, current trends in equality between women and men financing reflect increasing fragmentation, inconsistency and weakening of resources, particularly in development cooperation and humanitarian funding. Financial allocations are frequently channelled through broad categories that combine women and girls with other groups, without mechanisms ensuring that resources directly reach women or address their specific needs. In parallel, donor cuts and shifting political priorities are reducing the overall availability of funding for women's rights, particularly in fragile, conflict-affected and migration contexts where needs are most acute.

These trends are reinforced by funding modalities within EU external instruments that prioritise large international organisations, development banks and intermediary actors, often at the expense of grassroots and women-led organisations in partner countries. The EU funds in external actions are often allocated to a few well-known actors with high operational/administrative capacity who, on the surface, present a "feminist agenda" whereas in practice they do not collaborate with grassroots feminist organisations, have no contextual knowledge, and at times distribute EU funds in a way that exclude, deprioritise and marginalise women's rights organisations. With broadening definitions

of “feminism” which now encompasses industries that promote objectification and dehumanisation of women (e.g. pornography, webcamming, prostitution, surrogacy, “sugar dating”, etc) a whole range of actors promoting anti-women’s rights agendas have gained access to EU funding through external actions, purportedly doing a “feminist” work. This leads to structural exclusion of feminist grassroots organisations in third countries who are portrayed by the large intermediaries as a “threat” rather than the vital actors ensuring that EU funded projects are grounded in lived experiences of women and girls.

Furthermore, short-term project cycles, complex administrative requirements and limited direct access to funding further restrict the ability of local women’s organisations and women’s grassroots to participate in and benefit from EU external programmes. As a result, there is a growing disconnect between EU commitments to equality of women and men in external action and the actual distribution and accessibility of resources on the ground.

GAP IV should establish clear financing within EU external instruments specifically dedicated to women and women-led organisations, which must be defined on the basis of sex in lined with EU law, ensuring that resources are not reduced across broader categories and directed towards large entities without access to or with exclusionary practices towards feminists who work on such issues as prevention of VAWG, sex-based rights of women, abolition of systems of prostitution and reproductive exploitation of women. It should prioritise long-term, flexible and directly accessible funding mechanisms for women grassroots actors in partner countries, including those working in migration, humanitarian and conflict settings. GAP IV should also introduce robust tracking and reporting systems to monitor the proportion of external funding that directly benefits women as a distinct group and ensure that financial allocations are aligned with the EU’s stated commitments to advancing women’s rights globally. Furthermore, it is vital that the conditionality of funding is not predicated on contested ideological frameworks which are often rooted in colonialist and racist practices and that organisations distributing EU funds through intermediary programmes do not exercise undue power over small local NGOs by imposing concepts (e.g. “sex work”) that has no basis in EU law.

#### 4. Sex-segregated spaces and protection

In humanitarian, migration and institutional settings linked to EU external action, the absence of sex-segregated spaces continues to expose women to heightened risks of violence, harassment and re-traumatisation. This is particularly evident in reception centres, transit zones, detention facilities and emergency accommodation along migration routes and in partner countries cooperating with the EU. Women, especially migrant, displaced and trafficked women are frequently accommodated in mixed settings where overcrowding, lack of privacy and weak safeguarding mechanisms create conditions of insecurity, particularly for those who have experienced sexual violence or exploitation.

This gap is closely linked to EU external migration and border policies, including containment, externalisation and cooperation with third countries, where protection standards are uneven and accountability mechanisms limited. While the EU supports infrastructure, border management and reception systems in external contexts, safeguards ensuring women’s safety are not systematically embedded or enforced. As a result, the provision of sex-segregated spaces is often treated as an operational detail rather than a core protection requirement, left to discretionary implementation by partner governments or implementing actors. This leads to inconsistent standards, reduced access to services and increased exposure to violence for women across migration and humanitarian settings.

Furthermore, EU external migration policies, particularly those involving cooperation with third countries, have significant implications on women and girls that require more explicit recognition and mitigation. **Women and girls on migration routes are exposed to heightened risks of trafficking, sexual violence, exploitation, and abuse, particularly in transit and detention contexts. Current approaches to border externalisation risk contributing to environments where such violations occur, often with limited oversight or accountability.**

GAP IV should ensure that sex-segregated spaces are recognised as a non-negotiable protection standard across all

EU external action, particularly in migration management, humanitarian response and border-related cooperation.

## 5. Systems of sexual and reproductive exploitation (prostitution and surrogacy) as grave violations of women's human rights

Within EU external action, the system of prostitution is not recognised as a system of violence and exploitation that disproportionately affects women and is closely linked to transborder trafficking for sexual exploitation. This gap is particularly evident in the intersection between prostitution, migration governance and border externalisation. Migrant and displaced women, especially those in irregular situations or transit contexts, are disproportionately pushed into systems of prostitution as a survival strategy.

Policy approaches that frame prostitution as work, particularly within development and migration-related programmes, fail to account for these structural conditions and obscure the role of borders, status insecurity and restricted mobility in producing exploitation. As a result, EU-funded programmes risk normalising or overlooking exploitation, while failing to address the demand and structural drivers that link prostitution, trafficking and migration.

GAP IV should ensure that EU external action explicitly recognises system of prostitution as a form of violence against women and addresses its links to organised crimes, migration and border regimes. GAP IV should prioritise safe and regular migration pathways, reduce legal and economic dependency linked to migration status and ensure access to rights and protection for migrant women regardless of status. It should also support exit pathways for women in system of prostitution, including safe housing, healthcare, psychosocial support and sustainable livelihoods in partner countries and along migration routes. In addition, GAP IV should address demand and ensure that EU external migration and border policies do not contribute to conditions that sustain sexual exploitation and trafficking.

## 6. Technology-facilitated violence against women

EU action on digital regulation has made important advances, including through the Digital Services Act, which introduces enhanced obligations for platforms, particularly in relation to the protection of minors. However, this progress is not translated into EU external action. Women are not afforded targeted protection in external policies, dialogues and funding priorities, despite clear evidence that they are disproportionately affected by online harassment, sexual exploitation and technology-facilitated violence.

This gap has significant implications in external contexts and requires coordinated international responses. Digital platforms operate transnationally and play a central role in enabling systems of exploitation, including the recruitment, advertising and monetisation of system of prostitution and trafficking for sexual exploitation. At the same time, women, particularly migrant, displaced and conflict-affected women face increasing exposure to forms of technology-facilitated violence, including non-consensual dissemination of sexual images, deepfake pornography, online coercion and harassment, with limited access to reporting mechanisms, remedies or protection in cross-border contexts.

GAP IV should ensure that violence against women in digital spaces is systematically integrated into EU external action, with the same level of priority and specificity as the protection of minors under existing EU DAP. GAP IV should also strengthen access to cross-border remedies, support services and protection mechanisms for women affected by online violence, particularly in migration and conflict settings.

## 7. Accountability and substantive participation

Civil society engagement within EU external action remains largely consultative, with limited influence on decision-making, implementation and monitoring. This undermines the effectiveness and legitimacy of sex equality policies

and limits the ability to address structural inequalities.

GAP IV should establish mechanisms for substantive participation and co-creation with feminist, women- and migrant-women-led organisations across all stages of the policy cycle.

## 8. Women, Peace, Security 1325

Women, Peace and Security agenda, grounded in UN Security Council Resolution 1325, is not integrated across EU external policies, including migration governance, asylum systems, border management and security cooperation. While the EU and its Member States have formally committed to the implementation of the 1325 framework, significant gaps remain in translating these commitments into coherent, rights-based and sex-explicit policies affecting women within and at the borders of Europe.

These gaps are particularly evident in the EU's response to displacement resulting from conflicts, including in the context of Russian war against Ukraine and other conflict-affected regions. Women and girls arriving in the EU or transiting through neighbouring countries are exposed to heightened risks of trafficking, sexual exploitation, violence and economic precarity. Despite this, EU migration and asylum systems do not systematically apply a Women, Peace and Security lens and protection measures remain uneven across Member States.

At the same time, the participation pillar of Resolution 1325 remains insufficiently realised within European policymaking. Women, including migrant, refugee and displaced women, are underrepresented in decision-making processes related to security, migration and crisis response. Civil society organisations, particularly those led by women and migrant women, continue to face barriers to meaningful engagement, including limited access to funding and consultative mechanisms that do not translate into influence over policy outcomes.

GAP IV should ensure that the Women, Peace and Security agenda is fully operationalised within the European context, including through stronger alignment between internal and external policies. This requires embedding sex-disaggregated analysis across migration, asylum and security frameworks, ensuring consistent protection standards for women across all Member States and strengthening mechanisms for the identification and protection of victims of trafficking and gender-based violence. It also requires sustained and accessible funding for women-led and migrant-led organisations within Europe and ensuring their meaningful participation in policy design, implementation and monitoring.

Without such measures, EU commitments to Resolution 1325 risk remaining declaratory, failing to address the lived realities of women affected by conflict, displacement and insecurity within and at the borders of Europe.

## 9. Inequality between women and men in global trade and supply chains

Global trade systems continue to reflect and reinforce structural inequalities, with women disproportionately represented in low-paid, insecure, and informal work, often under poor working conditions. Global trade is structured through a complex web of bilateral agreements, regional economic communities, and broader continental frameworks, which together shape how goods, labour, and capital move across borders. While these systems have enabled economic growth, they have also entrenched asymmetries between regions and within societies. Lower-income countries are often integrated into global value chains in positions that prioritise cost competitiveness over labour protections, reinforcing a model in which **access to international markets depends on the availability of low-cost and flexible labour.**

Within this system, women are disproportionately concentrated in the most precarious segments of the economy. They are overrepresented in informal and unregulated work, including cross-border petty trade, seasonal agricultural labour, and labour-intensive manufacturing sectors such as textiles and garments. These forms of work are often characterised by low wages, lack of social protection, unsafe working conditions, and limited access to legal remedies.

In many regional trade contexts, particularly where regulatory frameworks are weak or unevenly enforced, informal cross-border trade constitutes a significant source of livelihood for women yet remains largely invisible in formal economic policy and unprotected by labour standards.

At the same time, the global demand for ever-cheaper goods continues to exert downward pressure on labour conditions across supply chains. Production is frequently outsourced to contexts where oversight is limited, and this creates environments in which exploitation can flourish. This dynamic intersects with trafficking in human beings, including for the purpose of labour exploitation, and women and girls are particularly vulnerable to deceptive recruitment practices and coercive working arrangements, especially in sectors such as agriculture, domestic work, and manufacturing. The fragmentation of supply chains, combined with weak enforcement and limited transparency, allows these practices to persist with insufficient accountability.

**These structural features of global trade are not incidental but systemic and reflect an economic model that prioritises efficiency and cost reduction, often at the expense of labour rights and human dignity. In this context, there is a pressing need for the European Union to more firmly align its trade and external economic policies with its commitment to equality between women and men, and human rights. Ensuring that goods entering the EU market are produced under conditions that respect human rights is a necessary step towards correcting structural imbalances in global trade.**

A human rights-based approach to trade must include robust due diligence obligations, effective monitoring mechanisms, and strict consequences for non-compliance. It should also recognise and address the specific risks faced by women in different sectors, ensuring that trade policies do not inadvertently reinforce existing inequalities.