

CONCORD's analysis of the European Commission Gender Equality Strategy March 2020

CONCORD Europe, the Confederation of European development and relief NGOs welcomes the European Commission's Communication "A Union of Equality: Gender Equality Strategy 2020-2025" that was launched on 5 March 2020. This is CONCORD Europe's reaction to the Gender Equality Strategy with a focus on the external dimensions of the EU's work on gender equality - for consideration in the design of the Gender Action Plan III, expected in October 2020.

Positive aspects of the Gender Equality Strategy

CONCORD welcomes the renewed commitment to women's and girls' rights and the reference to the Sustainable Development Goals and in particular to **SDG 5 as a key framework for the Gender Equality Strategy**. CONCORD also welcomes the commitment to coherence between EU external and internal policies regarding gender equality and the **close alignment of thematic priorities** (ending violence against women and girls, promoting women's economic and social empowerment and ensuring the fulfilment of their human, political and civil rights) of the Gender Equality Strategy and the Gender Action Plan II - priorities that we strongly recommend the European Commission to keep in the upcoming Gender Action Plan. We especially look forward to **the establishment of the new Equality Task Force**, which must ensure gender mainstreaming by bringing together all the Directorate Generals and the EEAS. This will be an important tool for coherence.

CONCORD welcomes the mentioning of **intersectionality as an important aspect of the Gender Equality Strategy** and of its implementation as a cross-cutting principle. The fact that a whole section of the Gender Equality Strategy is dedicated to intersectionality is positive, but it should have been backed up by further guidance on **how to apply an intersectional approach to gender equality**. Applying an intersectional lens is crucial to ensure that the efforts to achieve gender equality and girls' and women's rights take into account every form of discrimination they face as well as to increase linkages between gender inequality and other EU efforts to fight inequalities. While not specifically mentioned in relation to external policies, we hope that intersectionality will also be included as a cross-cutting principle in the GAP III. We welcome the inclusive language used by the European Commission in its strategy, in particular the mention that the Gender Equality Strategy will aim at achieving "a Europe where women and men, girls and boys, **in all their diversity**, are equal" (emphasis added). We hope to see such inclusive language in the new GAP as well, to ensure consistency between the GES and the GAP, but even more importantly to ensure that no one is left behind.

The commitment to consider **gender impact in trade initiatives** is most welcome, as it suggests going beyond including a reference to gender equality in the Trade and Sustainable Development chapters, which does not suffice. This commitment now needs to be translated into action, by carrying out participatory human rights impact assessments of trade deals with a gender lens ex-ante and ex-post, and adapting the provisions of the agreement to mitigate any potential negative impacts and harness positive impacts.

Room for improvement in the new Gender Equality Strategy

We welcome the reference to other EU external policy documents such as the Action Plan on Human Rights and Democracy (2020-2024), the EU Strategic Approach and Action Plan on Women, Peace and Security, and the EU Strategy with Africa. However, **it is essential that gender mainstreaming becomes standard practice across all new and existing initiatives** in order to positively transform the lives of women and girls and uphold their rights.

While we welcome the establishment of an Equality Task Force as an important first step for an institutional shift in favour of gender mainstreaming, we think that the Gender Equality Strategy could have provided a **more ambitious and concrete action plan for a full institutional shift towards gender mainstreaming**, as included in the Gender Action Plan II.

We welcome the reaffirmation of the EU commitment to ensure that 85% of all new ODA-funded programmes contribute to gender equality and women's and girls' rights. However, we want to **reaffirm the importance of targeted actions to achieve gender equality**. In this sense, we call on the European Commission to commit to have gender equality as a principal objective in 20% of ODA-funded programmes in the next GAP.

Although priorities of the Gender Equality Strategy and GAP are generally aligned and the European Commission reaffirms the need for internal and external coherence, the fact that the Gender Equality Strategy adopts a dual approach (gender mainstreaming and gender targeted action) instead of the GAP three-pronged approach (the two aspects mentioned above plus political leadership) can be seen as a missed opportunity for the EU to really promote gender equality at all levels. The political leadership aspect of the GAP has for instance allowed the EU to advocate in favour of gender equality in multilateral fora with great success. **We therefore call on the European Commission to keep the three-pronged approach in GAP III**. A full alignment of the EU's gender equality support to the EU and to partner countries is not possible, as the contexts of Europe and partner countries are different and the challenges faced also differ quite considerably. Therefore, a more profound, wider-ranging set of measures will be needed in the GAP III than what is needed in the Gender Equality Strategy. However, it is crucial that the two strategies are coherent and that the Gender Equality Strategy addresses the fact that EU internal policies can have a negative impact on gender equality in EU external action.

Although we welcome the strong focus of the Gender Equality Strategy on **gender stereotypes**, we would have liked to see this reflected in the section on external policies. To achieve gender equality, we believe it is crucial to prioritise gender-transformative action, including addressing harmful gender norms, and stereotypes, as well as **discriminatory laws and practices**. With this in mind, we urge the EU to ensure that GAP III brings the gender transformative vision of GAP II to the next level and puts addressing unequal structures and power relations, harmful gender norms, gender-based discrimination and supporting girls and women's agency at its centre. This also means prioritising more complex or sensitive issues, such as EU trade policy's impact on women's rights, gender equality and climate change, unpaid (overwhelmingly female) domestic & care work, the impact of the privatisation of public services, fiscal policies and austerity measures on women's rights, and sexual and reproductive health and rights (SRHR)¹.

The commitment to use the External Investment Plan to promote women's entrepreneurship and labour market participation is positive, but there is **no attention paid to the risks that the more prominent role of private companies may entail for women's rights**. Therefore, it will be important that in GAP III there is an explicit commitment to ensure that all projects supported by the EU in partner countries using private

¹ As members of CONCORD, Caritas Europa and CIDSE support the collective work of the Confederation, but do not (fully) endorse the SRHR language used in this statement.

sector instruments do no harm to women and girls' rights and preferably further them. This requires appropriate screening and monitoring mechanisms.

We welcome the fact that the Gender Equality Strategy contains actions **targeted for different stages of the life-cycle**. However, this is not reflected in section 6 on external action which is predominantly focused on adult women, with only a couple of references to girls and only in relation to ending violence. We hope that the GAP III will adopt a life-cycle approach and better define and address the challenges and needs of girls and women at different stages of their life, including in the areas of social and economic rights and political and civil rights.

We find the commitment to important tools such as collecting **gender-disaggregated data and gender budgeting** weak in the Gender Equality Strategy and hope that the implementation will strengthen this aspect, as this is key to understanding gender inequalities better and to addressing them.

What is missing in the Gender Equality Strategy

Women's and girls' rights have been subjected to a general backlash, in Europe and outside. This has had a strong, concrete impact on women's and girls lives, both in Europe and in partner countries. Although we understand and welcome the strategy's focus on solutions, we think it would have been helpful to highlight this context, in order to **convey a sense of urgency in the need to achieve gender equality** and to acknowledge the obstacles that are ahead if the EU is to fully implement the Gender Equality Strategy. Reaffirmed commitments to key conventions and frameworks such as CEDAW and the Beijing Platform for Action would have helped to reinforce the fact that women and girls' rights are human rights. Additionally, the Gender Equality Strategy only alludes to sexual and reproductive health and rights, while the rise of populism and growing conservatism within Europe, and the impact it has on SRHR requires an ambitious response.

We welcome that the **Spotlight Initiative** is mentioned but regret the lack of a concrete commitment to the future of the initiative. Gender-based violence is one of the most widespread human rights violations in the world and the European Commission should commit to thoroughly evaluate whether or not the Spotlight Initiative has been an appropriate and effective response thus far to address the issue and to take appropriate measures depending on the evaluation results.

Although we are happy to see an EU commitment to support women's rights defenders, we think there could have been **a stronger focus on the role of Civil Society Organisations (CSOs) and Women Rights Organisations (WROs) in bringing about gender equality**. CSOs and especially WROs play a key role in achieving gender equality, through their role as advocates, service providers or watchdogs, in particular regarding more complex or sensitive issues, such as tackling gender norms, promoting access to SRHR or addressing violence against women and girls. They deserve to be recognised and empowered as important actors at all levels, **especially at the local level in partner countries**.

There is not a single reference to the need to support progressive gender-sensitive taxation in partner countries, and we hope this will be included in GAP III under the priority "2. Promoting Economic and Social Rights and Empowerment of Girls and Women". In addition, while the EU is taking steps to address women's **unpaid care work and domestic work**, the EU should also recognise this as a major obstacle to women's access to decent work and to political participation in partner countries. We call on the EU and its Member States to unambiguously recognise women's and girls' unpaid care and domestic work both within the EU and outside, and support efforts to reduce and redistribute it, including through the provision of free and accessible quality public services.

The section of the strategy regarding the global dimension **does not include references to climate change**, while it has deep implications for women's and girls' rights. Nor does the Strategy address the need for European actors and citizens to change their way of life, make the economy work for the well-being of all and the governments' responsibility to financially support global mitigation and adaptation strategies as well as to take responsibility for unrecoverable loss and damage of natural resources essential for survival. The fact that, for example, the Green Deal is gender-blind, shows that gender mainstreaming is not being applied consistently across policy sectors, which hampers the overall achievement of gender equality.

While the introduction states that the Gender Equality Strategy's aim is a Europe where women and girls can equally participate in society, the corresponding section 'Leading equally throughout society' mostly focuses on adult women, in the world of work, and on their access to leadership positions. This does not reflect the equal participation that girls and women, in all stages of their lives and at different ages, should be able to exercise in society in general. In the GAP II, strengthening voice and participation is presented as central to the EU's approach. It is essential to support girls' and women's agency, and their active participation, in all stages of their life in order to achieve gender equality.

Finally, unlike in the GAP II **there are no clear objectives and targets nor monitoring mechanisms in the Gender Equality Strategy**, which are important to monitor progress, and allow stakeholders to hold the EU accountable for the commitments made.

