



EuroMed Rights
EuroMed Droits
الأورو-متوسطية للحقوق

GENDER ACTION PLAN III

Analysis and Recommendations

EuroMed Rights

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Rue des Comédiens 22, 1000 Bruxelles, Belgium

T +32 (0) 2 513 37 97 – E information@euromedrights.net - www.euromedrights.org

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Acknowledgements

On 25 November 2020, the European Commission [published](#) its third Gender Action Plan "**An ambitious vision on gender equality and women's empowerment for EU external action**". More commonly known as GAP III, this document will be the framework for the promotion of gender equality, women's and LGBTIQ+ rights in EU external action for the next five years.

EuroMed Rights welcomes the current proposal and appreciates the incorporation of a majority of its [recommendations](#), that were brought forward by member organisations part of its Working Group on Women's Rights and Gender Justice. However, there is room for improvement to ensure that GAP III will deliver in spite of the general context of backlash against gender equality both outside and inside the European Union (EU).

This document discusses and suggests 10 recommendations.

Recommendations

1. Supporting women human rights defenders and women's rights organisations in a shrinking space context

EuroMed Rights and its members blew the whistle on the growing trend of both **anti-gender organisations**, which target all policies related to "*gender ideology*" while hijacking feminist and human rights concepts and using EU fora dedicated to "civil society", and **government organised non-governmental organisations (GONGOs)** which *can* serve as a human rights facade for illiberal and/or autocratic regimes. GAP III does mention the fact that in many places, "women's and girls' rights are called into question and often denied" and that a **backlash against gender equality** is threatening "hard-won progress and existing laws" when discussing sexual and reproductive health and rights (SHRH).

EuroMed Rights welcomes the EU's intention to "**strongly support civil society** and contribute to "promoting an **enabling and safe environment**, including online, for civil society, girls and women's rights organisations (...)" and "strengthening protection mechanism(s)", including documenting violations against defenders of women's human rights. While the objective is commendable, it is, however, **unclear** how such an "enabling and safe environment" will be promoted, as there are **no clear objectives** linked to this element in the GAP's joint staff working document. In **autocratic or illiberal contexts**, the EU should not only support but should **ensure** that **safe spaces** exist in which Women Human Rights Defenders (WHRDs) can strategise, reflect and learn together, thereby enabling them to be **resilient** feminist advocates.

Regarding the **EU roadmaps for engagement with civil society (RMs)**, EuroMed Rights can only reiterate its concerns about these **new forms of civil society** and restate its position to see them integrated into the upcoming EU RMs. The EU needs to be proactive and strategic in its monitoring, consultation and advocacy work in order to efficiently counter growing pushbacks to gender equality.

Likewise, regarding **partnerships with stakeholders**, EuroMed Rights has reservations as to the EU's stated plans to "work in partnership with **national gender equality networks**". The point is crucial for the successful implementation of GAP III, but such partnerships must include *independent* gender equality networks. EuroMed Rights believes that the EU needs to **establish criteria** that would avoid the integration of GONGOs *over* feminist organisations. The EU should beware of working with such entities, which, in places, play an important part in shrinking the available space for independent women's rights organisations.

Finally, we welcome the fact that the GAP III aims to **increase the amount of funding for women's rights organisations and movements**. It is essential, especially as backlashes against women's rights organisations are often **financial**. We regret, however, that GAP III does not reconsider **current funding frameworks**, although it is known and documented that the current short term, project-based approaches to funding contribute to the shrinking space for civil society. In GAP II, there was a limitation in the continuation of programmes supported by the EU due to **short funding cycles** (2-3 years). These types of fundings create competition between feminist organisations, render them more vulnerable to change and/or attacks, jeopardise their independence and therefore make them less sustainable. **Funding cycles** should be developed on a **long-term basis**, in line **with the GAP III cycle** to achieve sustainable interventions and results.

2. Ensuring a clearly defined intersectional and inclusive approach

The integration of **LGBTI rights** within the framework of the GAP III and the inclusion of an **intersectional approach** are very positive developments. However, this intersectional and inclusive approach must be extended to include diverse feminist and LGBTIQ+ organisations and movements.

Furthermore, although imperfect, the inclusion of an intersectional perspective throughout the document does not necessarily mean implementing intersectional action on the ground. While GAP III foresees mandatory training on gender equality and implementation of GAP III, training must include an **intersectional perspective on gender equality**.

3. Involving women's rights organisations in the entire GAP process

The EU acknowledges that forging **strong partnerships and dialogue** with local actors, civil society and local communities and supporting women's organisations is essential. While we welcome the EU's approach, it must ensure not only **meaningful consultation processes** but also the **inclusion** of civil society organisations, especially **women's rights organisations**, during the **planning, implementation, monitoring and evaluation of the GAP**. GAP III calls on all EU Delegations to engage in at least **one dialogue on Gender Equality and Women's Empowerment with CSOs** per country, per year. **The objective** carries an indicator specifying the importance of "ensuring the inclusion of women's and girls' organisations". As "inclusion" is a normative word, it must be supplemented with a set of **defined criteria**.

4. Strengthening the role of the EU in safeguarding gender equality in third countries.

As recognised in the GAP III, conservative movements and political forces challenging women's and LGBTIQ+ rights are gaining ground. In this context, EU support is all the more crucially needed. At the **international level**, the EU's strategic engagement mainly includes a target of **at least 2 joint EU positions per gender-focused event per year**. The rest of the indicators - such as statements by EU officials and bilateral and regional dialogues - have **undefined** baselines, targets and data sources. The EU's ambitions need to be met with clear and measurable objectives and indicators. As for **non-gender focused international events**, the EU "strategic engagement" details commitments with the humanitarian initiative "Call to Action on Protection from Gender-Based violence in emergencies", with participation in "relevant events" set as its target. We find these objectives **extremely weak** in relation to the ambitions laid out in the GAP.

At the **country level**, where the EU could have the most impact on condemning violations and abuses against gender equality, the GAP focuses on “**dialogue**” with governments. The related objective is quite disappointing; its target is set to **at least one high-level dialogue per year, per country for all EU Delegations**. The EU has to be stronger and more vocal on gender equality, not only on matters that are specific to women’s rights and LGBTIQ+ rights but also in **critical areas** where gender perspectives are often sidelined like agriculture, security or trade where evidence shows that these sectors can potentially impact women’s lives and their rights significantly.

5. Increasing accountability in the implementation of GAP’s objectives.

We welcome the EU’s determination to reinforce a **gender-responsive EU leadership**, including heads of EU delegations and the fact that **gender focal points and advisers** will be strengthened, by offering knowledge and capacity-building opportunities, additional tools and by reinforcing their existing network. However, the EU must ensure that **Gender Advisors** (objective 11) have a **mandate and a position** which allows them to have **leverage** on GAP’s implementation.

We find the EU’s objective to follow an approach based on human rights very positive. However, the guiding principles of this **Human Rights Based Approach (HRBA)** ought to be fully accounted for through a development of **set mechanisms for accountability and transparency**.

Finally, it is evident that to achieve significant changes the EU should ensure that the GAP III is adequately **funded**. However, it is not clear how the EU will **fund the programmes implemented in third countries**. In that regard, the EU should not only focus on the percentage of new actions related to gender equality, but also on the number of programmes designed in the “country level implementation plans” and the number of actions funded.

6. Incorporating trade in advancing economic and social rights and empowering women and girls

We welcome the EU’s intention to promote gender equality through its **trade policy**. New trade agreements should include strong provisions on gender equality, including compliance with relevant International Labour Organisation (ILO) and United Nations (UN) Conventions, most notably the **UN Covenant on Economic and Social Rights and the ILO 190 which should be referenced in GAP III**.

We also welcome the inclusion of gender analyses in all ex-ante impact assessments, sustainability impact assessments and policy reviews linked to trade. However, the **objectives** concerning the aforementioned commitments are **missing** from the “Objectives and indicators to frame the implementation of the Gender Action Plan III”.

Additionally, we would recommend applying the same **three minimum standards** applicable for “*external EU funded programmes*”, **to trade agreements**. Most particularly, the **third standard** which provides that the EU gives **robust reasons**, based on the findings of the gender equality analysis, to **substantiate any trade agreements deemed not to contribute to gender equality**.

7. Ensuring freedom from all forms of gender-based violence: the centrality of data collection

EuroMed Rights welcomes the thematic area related to gender-based violence (GBV). It is very well outlined, carries hands-on and qualitative sets of indicators which cover the multiple forms, causes and manifestations of GBV. Most particularly, we welcome objective 7 which underlines the importance of Women's Rights Organisations as key actors in ending GBV. However, we would recommend that the **support of sex-disaggregated data collection on GBV at country level** should be mentioned in the EU contribution to combat GBV at country level. The Covid-19 pandemic has shown that the collection of data relating to GBV is crucial, and the EU can and should play a central role in that aim.

8. Advancing equal participation, leadership & digitalisation

Part 3.4 of the GAP III draws a good analysis of the multiple elements preventing women from enjoying their rights to take part in the **public and private spheres**. Most particularly, women in public life face serious attacks, including in forms enacted online. In this regard, the concrete EU action offered should include efforts to **hold information and communication technology providers accountable**. Businesses should also do their share in ensuring that women who engage in public life live free from violence online. Finally, the part on digitalisation should better reflect the issue of **online gender-based violence**.

9. Promoting the Women, Peace and Security Agenda

EuroMed Rights welcomes the focused objective of the Women Peace and Security (WPS) Agenda in GAP III and its strong focus on **gaining knowledge** in this field among EU staff. Women's Rights Organisations have a **vast knowledge resource** that ought to be utilised in the enhancement of EU knowledge management. We welcome the acknowledgement of the essential need of ensuring that **women's experiences and recommendations** are brought to the table in **peace processes**. GAP III does not clearly outline the proposed **division of support on militarised security support vis-à-vis human security**. Experience tells us that the latter is often relegated to the margins in the United Nations Security Council Resolution 1325 National Action Plan dialogues, a situation which the EU needs to prevent from re-occurring.

In many conflict-affected countries, populations are young. The same discriminatory norms that are enacted against women can also often prevent youth from having a voice. The EU ought to reflect the synergies of **promoting and creating inclusive peacebuilding processes** that bring together **WPS and Youth, Peace and Security** agendas as a **cornerstone for sustainable peace**.

10. Governance and management in control of natural resources

EuroMed Rights welcomes the EU initiative to include women in **leadership and decision-making spheres**. However, the **gendered aspect of sustainable use of natural resource governance and management** are not addressed. Worldwide, ownership and access to natural resources are gendered. While women might have access to water, energy and land, they do not always have the control on how to govern or manage it. This must be reflected in the GAP.