

AMNESTY INTERNATIONAL SUBMISSION

Amnesty International submission to the consultation on the EU Gender Equality Strategy 2026-2030

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With this submission, Amnesty International is sharing key principles and issues we believe should be addressed in the upcoming EU Gender Equality Strategy. We appreciate the opportunity to provide input through the meetings that have been organized and the online consultation process. This input builds on our 2024 [joint statement](#) with partners which sets out a clear, collective vision for gender equality in the EU, though by no means reflects all the work Amnesty International has done on these issues, nor does it include all forms and manifestations of gender-based discrimination that the strategy should address.

Amnesty International calls on the EU to put forward a Gender Equality Strategy that works towards the practical realization of a Union where everyone can live in safety, free from discrimination and violence, and where gender equality is not just an aspiration but a lived reality for all - regardless of their gender, ethnicity, race, gender identity and expression, sexual orientation, sex characteristics, disability, residence status, social class, age, among others. While the last mandate saw notable initiatives to advance gender equality, striking inequalities remain. We call on this Commission and member states to redouble efforts and to ensure that advancing gender equality remains a key priority mainstreamed throughout EU laws and policies with the necessary resources allocated.

In particular, we call on the EU to ensure the highest level of ambition is reflected in the Gender Equality Strategy 2026-2030, geared towards achieving the following objectives:

Realizing the full range of women's rights

o Upholding sexual and reproductive health and rights (SRHR)

SRHR are integral to EU values of fundamental rights and gender equality. However, serious disparities remain in ensuring equal access across the EU. These gaps arise from a lack of robust EU standards, despite Member States' binding international human rights obligations and substantial political commitments to SRHR. We call on the EU to:

- Fully utilize its existing competences to advance SRHR in EU law and policy and issue clear guidelines to Member States on SRHR in line with international standards;
- Strengthen EU actions and funding to improve access to sexual and reproductive healthcare and reduce health inequalities in and across EU Member States;
- Heed calls from the European Parliament to enshrine the rights to abortion and bodily autonomy in the Charter of Fundamental Rights of the EU, and SRHR in the Treaties;
- Ensure any rollbacks of existing entitlements and threats thereof be swiftly addressed and vehemently opposed as contrary to EU values;

- Explicitly recognize stigma and discrimination of sex workers as key structural barriers to health, and address the specific impact of stigma on sex workers' access to SRHR services;
- Put forward a legislative proposal for the creation of a cross-border solidarity mechanism to improve access to abortion care, on the basis of the European Citizens' Initiative 'My Voice My Choice', which could be funded by the EU4Health Programme.

o **Combating the backlash against gender equality**

The growing opposition to gender equality risks rolling back existing entitlements, directly contradicting the EU's founding values. To counter this, the EU must take robust action to combat anti-rights narratives and actors. It should further issue strong political condemnation and adopt sanctions against Member States that undermine gender equality, as well as women's, LGBTIQ people's and reproductive rights.

o **Protecting Women Human Rights Defenders and their organizations**

Across Europe, human rights defenders are increasingly at risk. Among them are women human rights defenders (WHRDs), who play a vital role as frontline advocates for gender equality and equal rights across the EU. Both because of who they are and because of what they stand for, WHRDs face heightened levels of attacks, harassment and threats, online and offline, smear campaigns, judicial harassment, and the defunding of their organizations. The EU must:

- Take decisive action to ensure that human right defenders - in particular WHRDs - receive robust political support and comprehensive protection in the EU; and that their organizations receive adequate funding.
- Work with teams responsible for civic space within the EU to build a protection mechanism for human rights defenders, as [proposed](#) by Amnesty International and other civil society partners; and ensure this mechanism as well as the upcoming Civil Society Strategy effectively addresses the specific protection needs of women human rights defenders and sexual and reproductive health and rights defenders.

Ending sexual and gender-based violence

The EU's accession to the Istanbul Convention and the adoption of the EU Directive on combating violence against women and domestic violence were important steps forward to ensure the prevention, support and protection of victims of sexual and gender-based violence. It is imperative we now focus on the practical implementation, in addition to further advancing the standards.

o **Implementing the Directive on combating violence against women and domestic violence**

The European Commission must work with civil society to develop and roll-out clear guidelines to assist member states in transposition and implementation. National authorities must also integrate the expertise of CSOs at national level to achieve the following objectives:

- Strengthen primary prevention: Prevention must go beyond awareness-raising campaigns to actively stop gender-based violence (GBV) from occurring. A comprehensive approach to primary prevention should include peer education, feminist self-defense, school-based programs; the provision of training to transform societal norms that perpetuate violence; and foster bystander intervention. These measures are essential for building a future free of GBV.
- Provide comprehensive sexuality education: Mandatory comprehensive sexuality education (CSE) is a cornerstone of primary prevention. In line with international standards and the Directive, Member States must ensure the provision of CSE, including education on consent.
- Secure the rights of victims and survivors. Member States must guarantee the rights and respond to the needs of all victims and survivors, especially those facing intersecting oppressions, including LGBTIQ women, racialized women, women with dependent residence permit, undocumented migrant women, women sex workers, women in exploitative or trafficking situations, women with disabilities and other marginalized groups. Victims

of sexual violence in particular must be guaranteed full access to support services, including comprehensive sexual and reproductive healthcare.

o **Going beyond the Directive**

To address the full spectrum of GBV and ensure no one is left behind, the EU and its Member States must also:

- Include gender-based violence (GBV) as a crime in the EU Treaties.
- Recognize that sex without consent is rape and establish EU-wide consent-based definitions of rape and other sexual violence crimes.
- Address all violations of SRHR, such as obstetric and gynaecological violence, intersex genital mutilation and the denial of abortion and post-abortion care, including through formulating clear recommendations on these harmful practices to member states, in line with international guidelines.
- Establish safeguards to ensure the rights of women who are undocumented, or have precarious residence status. More likely to experience violence and abuse precisely because their status puts them in a situation of vulnerability, it is of utmost importance that they are able to safely report violence and abuse and file complaints. This should include the establishment of ‘firewalls’ separating immigration enforcement activities from public services provision, so that they are able to access healthcare and support services, safely report violence and abuse, and access justice, without fear of deportation. The EU should reject harmful measures such as ‘reporting obligations’ and refrain from adopting measures that would increase their vulnerability, such as the introduction of ‘detection measures’ in the revision of the EU Return Directive. Ensure that any upcoming EU legislative or policy initiatives comply with strict data protection safeguards, in line with article 8 of the Charter of Fundamental Rights as well as with the General Data Protection Regulation and the Law Enforcement Directive.
- Address the disproportionate impact of the criminal justice system on marginalized communities: While criminal law plays an important role in ensuring accountability, systemic biases in law enforcement and justice disproportionately police and criminalize groups like undocumented people, sex workers, LGBTIQ individuals, and racialized communities, worsening their vulnerabilities and denying them access to justice. We encourage the EU to prioritize community-led solutions and focus on healthcare, housing, education, and welfare.

Responding to intersectional discrimination and oppression

The Gender Equality Strategy must adopt a robust intersectional approach to tackle the structural systems of oppression perpetuating gender inequality. Achieving gender equality requires addressing overlapping forms of discrimination that affect different groups, in particular LGBTIQ people (including LBTIQ women), racialized women, women with dependent residence permit, undocumented migrant women, women sex workers, women in exploitative or trafficking situations, women with disabilities, and other marginalized groups. **A feminist and intersectional perspective must be integrated across all EU policy areas**, including those within the Union of Equality Agenda (e.g. LGBTIQ, Anti-Racism, Child Rights, Disability, Roma Rights), as well as areas such as migration, victims’ rights, social inclusion, civic space, health, long-term care, early childhood education, digital rights, employment, education, disinformation, and foreign policy.

Discrimination on the basis of gender is often combined with discrimination on the basis of gender identity and expression, triggering multiple and double discrimination; hence **a horizontal intersectional perspective is essential in any gender equality policy**. In times of enhanced attacks on **trans people**, European gender equality mechanisms must be strengthened to recognize the intersections of various axes of discrimination and the complex ways in which sex and gender-based discrimination affect trans people. We urge the Commission to adopt a truly **comprehensive and intersectional approach to gender equality** in its forthcoming Gender Equality Strategy 2026-2030 and explicitly include trans people.

We call on the Commission to step up efforts to protect the rights of sex workers. **Sex workers** have long been left behind in gender equality and human rights policymaking, but there is growing recognition by international and regional human rights bodies that sex workers face multiple and intersecting forms of discrimination, including on the basis of gender, class, race, migration status, and sexuality, and that their rights must be meaningfully addressed in equality frameworks.

Recognition of sex workers' rights and inclusion of their voices in the Gender Equality Strategy would be an important step in aligning EU policies with international human rights standards and fulfilling the EU's own commitments to intersectionality and non-discrimination.

We [welcomed](#) the inclusion of sex workers as a specific group at risk in the Commission's proposal for a Directive on Violence against Women and Domestic Violence, as well as the use of the term "women in sex work" (preamble paragraph 56, Article 35). People involved in sex work have chosen this terminology, and usually consider terms relating to "prostitution" or "prostitutes" to be stigmatizing. While the Council and European Parliament acted to change this language in the final text, it should not prevent the Commission to remain ambitious and further promote this inclusive language in the Strategy and in future initiatives. **The new Gender Equality Strategy must be therefore be inclusive of sex workers**, recognizing their lived realities, addressing the structural inequalities they face, and ensuring that gender equality policies do not leave them behind.

We also call for due attention to the discrimination of all racialized women and in particular **Muslim women**. Muslim people in Europe have been discriminated against on racial and ethnic grounds in intersection with religious grounds. Muslims are racialized in categories encompassing perceived race, ethnicity and/or nationality, irrespective of their religious practice and actual religion. It is within this context that international human rights bodies have noted the intersectionality of racial and religious discrimination experienced by Muslims. Islamophobia is a form of racism and there is also a strong intersection with gender-based discrimination. The wearing of headscarves by Muslim women, for example, has long been instrumentalized and negatively stereotyped to demonize Muslim women and girls and homogenize the diverse significance they may represent to those who wear them or would wish to wear them but fear to do so or are legally prevented from doing so in public.

This discrimination takes places across the European Union. One of the member states where Amnesty International has [documented](#) the alarming [evolution](#) of a hostile environment for Muslims and those perceived to be Muslim is France. This includes persistent racist and discriminatory rhetoric linking Islam and terrorism, for instance in speeches by politicians, as well as the disproportionate impacts on Muslims of counter-terrorism laws and policies and repressive measures against Human Rights Defenders accused of being terrorists or supporting terrorism simply for advocating for the protection of Muslim people's human rights. Muslim women are more likely to be targets and victims of hate crimes than Muslim men according to, for instance, a [2016 report](#) by the European Network Against Racism (ENAR), which also found that racist violence against Muslim women is mainly committed in public places, such as public transport, streets, markets and shops, or in the workplace, and includes insults, spitting at women who wear face veils or headscarves or pulling their clothing off. While barriers to participation in sports motivated by gendered Islamophobia exist in different countries in the region, even though they do not ban sports hijabs, according to the information gathered by Amnesty International, France is the only country in Europe with bans on religious headwear in sports, including women's football, basketball and volleyball. Amnesty International's [2024 report](#) sheds light on these discriminatory practices and how they violate the human rights of Muslim women and girls in France.

All EU efforts on equality should speak to each other to ensure a truly intersectional approach. The new Gender Equality Strategy should further include an intersectional lens while strengthening enforcement of EU law including through the use of infringement proceedings under the Gender Equality Directives, when systemic discrimination targets only women, and under the Race Equality Directive, when such systemic discrimination is related to strict 'racialized' victimization of Muslim women rather than their actual degree of religiosity.

Ensuring sufficient funding

The strategy should be properly resourced, both within the European institutions and for civil society working on these issues. Sufficient, sustainable, and long-term funding is essential to ensure that the policies and initiatives needed to achieve gender equality are fully implemented, and that civil society organizations (CSOs) working towards gender equality remain resilient in the face of political and societal backlash. As the EU begins negotiations on the next Multiannual Financial Framework next year, we call for:

- Gender budgeting throughout the entire budgetary process, with targeted budget lines for gender equality and anti-discrimination initiatives, with an intersectional perspective.
- Continued support to CSOs, particularly those working in hostile environments, through funds under direct management by the European Commission. This should include core funding and funding for strategic litigation.

- Increased accessibility of EU funding for grassroots and community-based organizations; notably through regranting schemes that alleviate financial and administrative burdens on smaller organizations.
- Safeguards to ensure that no EU funds are ever provided to Member States or groups that violate the EU Charter of Fundamental Rights.

Conclusion

While developing the new Gender Equality Strategy, we urge you to work closely with those developing other relevant strategies, in particular those on Anti-Racism, on LGBTIQ, on Civil Society, as well as the European Pillar of Social Rights. All strategies should be created coherently, ensuring a truly intersectional approach.

The Gender Equality Strategy should be grounded in human rights obligations. It should be bold and concrete and aim for a better future. It is the duty of the European Commission, as Guardian of the Treaties, to stand up for human rights, for dignity and equality, even when majorities in politics may shift in different directions.

We urge the EU institutions and Member States to join us in building a more just and equal society. Equality must remain a top priority in all EU policy processes over the next five years. Let us work together to ensure that women and girls in all their diversity in the EU can live free from violence, discrimination, and oppression.