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Implementing the EU's Strategic Approach to Women, Peace and Security (WPS) as part of the Gender Action Plan III

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November 2021 marked one year since the adoption of the EU's third Gender Action Plan (GAP III), which for the first time fully integrated Women, Peace and Security (WPS) as a key thematic area. As MEP Hannah Neumann highlighted during a May 2021 hearing of the European Parliament Committee on Foreign Affairs to discuss GAP III, "what is key now is the *implementation* of these ambitious strategies, because strategies do not change the world by being on paper."¹

Although translating policies into implementation² has always been a key challenge of EU external action, effectively implementing WPS and GAP III is particularly important given ongoing challenges to gender equality and women's empowerment, including social effects of the COVID-19 pandemic and political backlash against gender equality in many parts of the world.³

With this in mind, this paper will reflect on the first year of GAP III implementation, and the steps taken to integrate WPS into the EU's broader gender equality framework thus far. After reviewing the integration of the current EU policy framework for WPS into GAP III, two mechanisms used in 2021 to promote the implementation of these policies will be explored: (1) the Country-Level Implementation Plans (CLIPs) and (2) the first annual Structured Dialogue on GAP III implementation. Finally, the author will discuss key challenges, opportunities and recommendations for the implementation of WPS as part of GAP III.

This discussion reflects on the process which led to the preparation of the CLIPs rather than the content of the documents themselves, which were not publicly available at the time of writing.⁴ Research included 4 remote interviews with Gender Focal Points (gender focal points) in 3 countries⁵ (Armenia, South Sudan, Bosnia-Herzegovina) in July 2021, and analysis of support documents prepared by the Directorate General for International Partnerships (DG INTPA) and the European External Action Service (EEAS) and observation of the Structured Dialogue.

Integrating Women, Peace and Security (WPS) into the EU's third Gender Action Plan (GAP III)

The EU adopted its Strategic Approach to WPS in 2018 and corresponding Action Plan in 2019. The Strategic Approach identifies actions under the key areas of prevention, protection, and relief and recovery, with the overarching goals of mainstreaming and participation.

In November 2020, the EU's work on WPS was integrated for the first time as a key thematic area⁶ of GAP III, which is the main policy framework for the promotion of gender equality in the EU's external action. GAP III is therefore an important vessel for the implementation and reporting of the EU's WPS commitments. Although GAP III is meant to apply to every facet and actor of the EU's external action, key actors contributing to WPS like the political section of EU Delegations and Common Security and Defence Policy (CSDP) missions and operations have in the past fallen outside the remit of the GAP framework because they are not part of the European Commission. This is itself a challenge, as the EU's work on gender equality and WPS has traditionally been kept institutionally separate: gender equality has primarily been housed in the European Commission, while WPS was led by the EEAS.⁷ The two institutions have different systems, processes, and cultures.⁸ This institutional separation exists in Brussels, but also in third countries, where the EU Delegations, CSDP missions and operations

and EU Special Representatives all contribute to either or both the implementation of the GAPs and WPS, but coordinate their efforts at times unsystematically. The integration of WPS into GAP III should therefore serve as an opportunity to increasingly assimilate EEAS-managed instruments into the gender equality framework, and increase coordination between the EU external action institutions for the implementation of WPS objectives.

The relatively recent integration of WPS into the GAP framework is also symptomatic of a traditional conceptual distinction between WPS and gender equality: whereas gender equality is anchored in the Sustainable Development Goals (SDG) ‘development’ framework and the EU Treaty, WPS originated from UN Security Council Resolution 1325 ‘peace and security’ framework. Furthermore, WPS focuses particularly on increasing women’s agency in conflict-affected areas, while gender equality issues are everywhere and therefore encompass more geographies.

To tackle these conceptual challenges, the GAP III Joint Communication articulates that gender equality is imperative *inter alia* to peace and security,⁹ and emphasises “the need to understand gender inequality as a root cause and driver of conflict and fragility.”¹⁰ The objectives, fulfilment criteria and indicators of the 2018 Strategic Approach to WPS have also been integrated into the GAP III Staff Working Document, strengthening the message that WPS is a full component of GAP III.

Acknowledging the importance of ‘stepping up’ the implementation of its GAP III,¹¹ the EU created in 2021 two mechanisms to support and strengthen this implementation: the Country-Level Implementation Plans (CLIPs) and the Structured Dialogue. The following section will outline key features of these two mechanisms.

Mechanism #1: the Country-Level Implementation Plans (CLIPs)

Throughout 2021, EU Delegations prepared CLIPs to set the specific GAP III priorities and identify key actions and objectives in each of the countries where GAP III will be implemented.¹² These CLIPs were to be based on an updated Gender Country Profile,¹³ and where relevant, Gender Sector Analyses.¹⁴ The deadline for EU Delegations to submit their CLIPs was the end of July 2021, after which the DG INTPA unit responsible for Gender Equality, Human Rights and Democratic Governance (DG INTPA G.1) reviewed them.

Support from Headquarters for the CLIPs

Gender focal points in the EU Delegations were tasked with carrying out the CLIPs process. To support them in this process, DG INTPA G.1 and the EEAS provided EU Delegations resources including training sessions, support meetings, webinars and an online platform for gender focal points to exchange on challenges and solutions. An EU official reported that by May 2021, DG INTPA G.1 had trained over 600 people in dedicated training sessions for implementing GAP III.¹⁵

In addition, INTPA G.1 developed a template for the CLIPs, which outlined the different elements these were to include: (1) a short overview of the context for EU action for gender equality and women’s empowerment in the country, (2) a list of the selected thematic areas of engagement and objectives, (3) identified targeted action(s) supporting gender equality and

women's empowerment, (4) identified opportunities to engage in dialogue for gender equality and women empowerment with the partner country government and/or other relevant stakeholders, including CSOs, (5) outreach and other communication / public diplomacy activities, (6) resources allocated to support GAP III implementation.¹⁶ This template also specified that the CLIPs should be 3-5 pages in length, and "concise and dynamic" documents.¹⁷

Consultations for the CLIPs

As part of this support to EU Delegations, INTPA G.1 mandated in guidance documents and public statements in early 2021 that CLIPs should be consultative, highlighting the importance of involving Member States, civil society and the range of EU institutions working in a given country (including CSDP missions and operations).¹⁸ Guidance for both the preparation of the Gender Country Profile and the CLIP emphasized wide consultations, and in particular engagement with civil society, peacebuilders and women's organisations.¹⁹

Coordination of CLIPs with identification of funding priorities

In parallel to the CLIPs, EU Delegations prepared the Multi-Annual Indicative Programmes (MIPs) which will determine EU funding priorities in a given third state for the next few years during the first half of 2021. The EU is the world's largest donor of development assistance,²⁰ so the programming phase of the EU's external action budget is an important period to ensure that certain priorities receive appropriate attention and funding. The Neighbourhood, Development and International Cooperation (NDICI) funding instrument requires actions to be guided by the principle of gender equality, and for 85% of new NDICI-funded actions to have gender equality as a principal or significant objective, but the degree to which this is done in practice remains to be seen during the implementation phase.²¹ The MIPs are meant to reflect this quota and policy commitments, including GAP III.

Mechanism #2: the Structured Dialogue on GAP III implementation

On 25 November 2021, the DG INTPA and EEAS jointly convened the first annual Structured Dialogue with civil society organisations to take stock of the first year of GAP III implementation (hereafter 'the Structured Dialogue') with a focus on the CLIPs, and particularly consultations and partnerships.

The concept of Structured Dialogues is not new: it is a format the European Commission uses frequently to engage with civil society, the private actors and local authorities on a variety of issues, from the cultural sector to supply chain security. The Structured Dialogue on GAP III implementation was the first on gender equality in external action, however, to include non-members of the DG INTPA-managed Policy Forum on Development to participate, as part of an effort for more inclusivity. The line-up of speakers during the Structured Dialogue included representatives of local civil society organisations.²²

Civil society organisations were part of the Steering Committee meetings and supported the design of the Structured Dialogue's agenda. Over 130 participants joined the online Structured Dialogue, including representatives of local and international civil society, EU Delegations, and Brussels-based EU institutions.

The Structured Dialogue featured a breakout session on WPS, during which participants were prompted to reflect on how to better engage CSOs working on WPS, women mediators and peacebuilders in the implementation of GAP III and the CLIPs, and whether conflict analyses and conflict sensitivity considerations are adequately informing gender analyses. During the breakout session on WPS, participants particularly called on the EU to:

- Draw on the expertise of women analysts in conflict analyses, and better integrate gender equality into these analyses, as well as conflict analysis into gender analysis.
- Treat women and girls as agents of change and not only as victims of conflicts, and work to change the stereotyped perceptions some interlocutors have of women-led CSOs.
- Work to ensure that the EU consults the broad diversity of women’s organisations, not only those based in metropolitan/urban areas and/or representing elite or majority viewpoints.
- Prioritize the safety of women human rights defenders and peacebuilders, and compensate them to enable their participation in consultations and other EU processes
- Use the full range of EU tools (i.e. funding, technical, diplomatic and political) that are available due to the integration of WPS into GAP III in order to promote gender equality.

The preparation of the CLIPs and the Structured Dialogue revealed several challenges and opportunities for the implementation of WPS as part of GAP III in 2021. The following section will explore three of these challenges and opportunities to tackle them in the coming months and years: (1) ensuring that GAP III priorities, including WPS, are reflected in funding decisions, (2) Supporting “bottom-up” implementation and institutional collaboration, and (3) Conducting meaningful and inclusive consultations.

Identified challenges and opportunities for WPS implementation as part of GAP III

Challenge #1: Ensuring that GAP III priorities, including WPS, are reflected in funding decisions

Funding has been a chronic issue for gender equality and the WPS agenda: a report by UN Women in 2015 called insufficient funding “the most serious and persistent obstacle” to the implementation of WPS, and this has also been a shortcoming for the EU in recent years.²³ Furthermore, research on implementation of the previous EU GAP (GAP II) suggested that there has sometimes in the past been a mismatch between policy and funding priorities.²⁴ Policy processes such as the GAP III CLIPs should therefore be prepared in a way that can effectively inform the EU’s funding decisions, to ensure that agreed policy priorities are allocated appropriate resources to back their implementation, rather than vice-versa.

Unfortunately, the GAP III CLIPs process began after each EU Delegation submitted the first draft of their MIPs in February 2021. The relevant teams in DG INTPA and the EEAS were aware of the importance of this overlap between the funding programming process and the launch of GAP III, and reportedly supported gender focal points in EU Delegations accordingly to ensure that GAP III principles and objectives would feature in the funding priority-setting MIPs.²⁵ The CLIP template called for “close articulation with the MIPs”,²⁶ but did not specify how this should be done in practice or what a successful coordination would look like. The CLIP template also prompted the penholder to reflect on the resources planned to be allocated to

support GAP III implementation. Although the Gender Focal Points reported being reasonably pleased with the integration of gender equality priorities in the MIPs,²⁷ it remains to be seen the degree to which these documents reflect the priorities that were then decided upon in the CLIP process, especially WPS priorities in CLIPs in conflict-affected countries.

➤ Opportunities

- In the coming months, EU Delegations and DG INTPA will be preparing Annual Action Plans for both the NDICI geographic and thematic programmes (including on Peace, Stability and Conflict Prevention, and Human Rights and Democracy). This will be another opportunity beyond the MIPs to ensure that priorities identified in the GAP III CLIPs, including WPS-specific priorities, are reflected in funding priorities.
- With a long-term view, relevant EU actors should ensure that policy and funding priority-setting exercises are designed and sequenced so that policy decisions inform funding decisions. For example, this means that EU Delegations should prepare possible CLIPs and related processes such as consultations for the next Gender Action Plan (GAP IV) in advance of the next round of funding programming.

Challenge #2: Supporting “bottom-up” implementation and institutional collaboration for integrating WPS in GAP III

Throughout 2021, DG INTPA and the EEAS promoted the bottom-up implementation of GAP III, and supported EU Delegations throughout the CLIPs process.²⁸ Gender focal points interviewed for this paper generally commented that they found this support to prepare the CLIPs, including the template and webinars, very helpful.

They also noted, however, that there was no specific training on WPS and that additional guidance specifically to support the integration of WPS into GAP III would have been useful, as it is a new thematic area that many gender focal points may not have worked on beforehand. A recent report by ECDPM found that in some cases, understanding of WPS is limited across EU Delegations.²⁹ These shortcomings in understanding of WPS and thematic support on WPS may have undermined the extent to which EU Delegations included and mainstreamed WPS-specific elements in the CLIPs and related processes.

Challenges of institutional coordination between the European Commission and the EEAS, and efforts to overcome them, could be seen during the Structured Dialogue and the process which led up to it. Although the EEAS were absent during the first Steering Committee meeting in September 2021, a few EEAS officials were present during the actual Dialogue particularly to discuss WPS, but also to reflect on other GAP III thematic areas. While this inclusion of the EEAS into the Structured Dialogue is a welcome step towards increased inter-institutional coordination, future reflections could involve the EEAS from the design and initial planning stages to promote joint ownership of the process and support further integration of WPS into GAP III. Involving other EEAS actors contributing to WPS beyond the office of the Advisor on Gender and Diversity in future reflections on GAP III, such as the gender focal points in CSDP missions and operations, and staff in the EEAS Directorate for the Integrated Approach for

Stability and Peace (ISP), could also enhance this institutional collaboration for WPS implementation.

➤ *Opportunities*

- DG INTPA, the EEAS, EU Delegations and CSDP missions and operations should use reflections on the CLIPS as a starting point for exchanges to deepen knowledge, awareness, collaboration and expertise on WPS and gender equality issues. DG INTPA has reported they are already engaging in this type of follow-up and support, and should continue to do so.
- All relevant EU actors should use gender-sensitive conflict analyses and conflict-sensitive gender analysis not only to inform programming and also to promote inter-institutional cooperation and joint learning and awareness of situations.
- DG INTPA should make requirements and guidelines for reporting very clear, in particular in relation to WPS as a new element of GAP III. Clarifying expectations in this regard will enable EU Delegations to better integrate WPS into their work.

Challenge #3: Conducting meaningful and inclusive consultations

Building policies and actions in consultation with civil society organisations, and in particular women-led and grassroots organisations, is a hallmark of the gender equality and WPS agendas. It is key to ensure civil society and local perspectives, including those of women-led organisations and peacebuilders, and the priorities of activists inform actions. Engaging in consultations also enables the EU to build partnerships and a more accurate understanding of the local needs and the situation.

While DG INTPA and the EEAS mandated the CLIPs to be consultative, the degree to which each EU Delegation carried out consultations in preparation for the CLIPs varied depending on their resources (human, structural and time-bound) and the political context. For example, the EU Delegation in Armenia drew on a consultation conducted for the MIP to inform their CLIP. An EU official suggested that the availability of external support in the form of a framework contract to outsource some parts of the CLIP process contributed to enabling some additional consultations in Armenia.³⁰ By comparison, an EU official in South Sudan commented that establishing a new contract for receiving external support for their CLIP would be too time-consuming in itself, as well as incompatible with the timeline for turnover in the gender focal point position. She suggested this inability to organise external support, in addition to the challenging political context which made it difficult to identify and access relevant civil society organisations, would likely lead to a less consultative process.³¹ The EU Delegation in Bosnia Herzegovina, which employed an external consultant as well and has several gender focal points within different sections of the EU Delegation, was able to have a dedicated and multistep consultation for both the CLIPs and the MIPs.³² There was also no disaggregated information available on the participants in consultations available to identify whether civil society organisations working on peacebuilding and conflict-prevention in these countries had been involved in the preparation of the CLIPs.

It appears that EU Delegations with more staff or existing partnerships were better equipped to deal with incoming requests to prepare the CLIPs, in part by outsourcing this

preparation to external consultants. However, the quality of an outsourced process is dependent on the person, team and entity it is outsourced *to*, the modalities of outsourcing, and the terms of reference. There are both benefits and limitations associated with outsourcing planning processes such as the CLIPs: while on the one hand, employing external support can undermine ownership of the document and institutional memory on the subject, it can also sometimes enable more thorough processes and bring in expertise which might not already be housed in the EU Delegation, and relieve workloads within the Delegation.³³ The choice of external support and modalities of the contract may also impact the integration of WPS into GAP III, for example if the consultant preparing a CLIP in a conflict-affected context does not employ conflict-sensitive methods.

The degree to which gender equality, WPS and consultations is considered a political priority by each EU Delegation and its leadership also likely impacted the ways in which resources (either EU Delegation staff time or funding for establishing consultancy contracts) were allocated, and therefore affected the degree to which consultations were made possible.

During the Structured Dialogue, participants also emphasised the importance of that these consultations be meaningful. ‘Meaningful consultation’ usually refers to sincere engagement with the goal of integrating recommendations and contributions as much as possible. ‘Meaningful’ consultations also tend to result in feedback loops, with consultations being only part of ongoing relationships and exchanges between actors. Participants during the Structured Dialogue highlighted that this is sometimes, but not systematically the case for EU-led consultation processes.³⁴ In some places, like Kosovo, participants welcomed that the EU Delegation compensated activists for their participation in the CLIP consultations, which enabled a more meaningful engagement.³⁵

➤ Opportunities

- As many EU Delegations have finalised their CLIPs, they should continue engaging with the organisations and individuals which contributed during the consultations to ensure that these interactions lead to meaningful and long-term dialogues. For example, EU Delegations could communicate with civil society about their plans to include priorities highlighted during the consultations in the funding Annual Action Plans. To enable further engagement, EU Delegations should also publish their CLIPs or circulate them amongst relevant civil society contacts.
- Relevant EU actors, such as the EU Delegations and DG INTPA, should collect and communicate about best practices on successful engagement with civil society during the CLIPs process, such as the EU Delegation in Kosovo’s compensation of activists during the CLIPs process. This would enable EU Delegations to replicate existing initiatives and promote more consultative processes.

The CLIPs and the Structured Dialogue demonstrated clear efforts to step up the implementation of WPS in GAP III in 2021, and future actions should build on these directions.

GLOSSARY

Acronym	Full name
CLIP	Country-Level Implementation Plan
CSDP	Common Security and Defence Policy
CSO	Civil Society Organisations
DG INTPA	European Commission Directorate General for International Partnerships
EU	European Union
EEAS	European External Action Service
GAP III	Gender Action Plan III
ISP	EEAS Directorate for the Integrated Approach for Stability and Peace
MEP	Member of the European Parliament
MIP	Multi-Annual Indicative Programme
NDICI	Neighbourhood Development and International Cooperation Instrument
WPS	Women, Peace and Security

ENDNOTES

¹ European Parliament Committee on Foreign Affairs, [Presentation of the Opinion on the EU GAP III](#), 14 June 2021, minute 16:47:30.

² While an exact definition of policy implementation remains elusive, it can be generally understood as the processes, outputs and outcomes which contribute to the execution of a given policy, in which various actors, organisations, procedures and techniques work together with the view of attaining certain goals. For more on the theoretical underpinnings of policy implementation, see Khan, Anisur Rahman “A Critical Note into Theoretical aspects of policy implementation and implementation failure” (2016).

³ European Commission, "[International Women’s Day 2021: COVID-19 pandemic is a major challenge for gender equality](#)", press release, 5 March 2021; UN Women, "[Democratic backsliding and the backlash against women’s rights: Understanding the current challenges for feminist politics](#)", Discussion paper, by Conny Roggeband and Andrea Krizsán, June 2020; UN Women, "[20 years on, COVID-19, conflict and backlash test the women, peace and security agenda](#)", blog post, 19 October 2020.

⁴ Please find the CLIP overview documents published by DG INTPA for Nepal, Nigeria and Kosovo here: <https://europa.eu/capacity4dev/policy-forum-development/discussions/cso-la-structured-dialogue-enhance-implementation-eus-action-plan-gender-equality-and>

⁵ The three countries were chosen as case studies because of their differing size, proximity and strategic importance to EU external action, and the presence of EPLO Member Organisations in those countries.

⁶ GAP I 2010-2015 featured implementing the 2008 EU Comprehensive Approach to WPS and the 2018 Strategic Approach to WPS as an action point in itself, and GAP II 2016-2020 included select elements specific to WPS in the stated indicators and activities. The six key thematic areas in GAP III are: (1) gender-based violence, (2) sexual and reproductive health rights, (3) economic and social rights, (4) equal participation and leadership, (5) WPS, and (6) green transition and digital transformation.

⁷ The EEAS had a Principal Advisor on the Implementation of UNSCR 1325 on WPS until December 2020. This role has since 2021 been replaced with an Advisor on Gender and Diversity.

⁸ For example, teams working for DG INTPA are more project-focused than those at the EEAS (source: EU official in conversation, October 2021).

⁹ European Commission and European External Action Service, '[EU Gender Action Plan III: An Ambitious Agenda for Gender Equality and Women's Empowerment in EU External Action](#)', Joint Communication, 25 November 2020, pp. 1.

¹⁰ European Commission and European External Action Service, *op. cit.*, 2020, pp. 17.

¹¹ European Commission and European External Action Service, *op. cit.*, 2020, pp. 3.

¹² European Commission and European External Action Service, *op. cit.*, 2020, pp. 7.

¹³ A Gender Country Profile is a comprehensive and structured gender analysis in a given country, usually including an assessment of the following elements: political and legal context, effects of conflict or fragility on gender equality, gender statistics and sex-disaggregated data, key gender discrepancies and barriers, key entry-points and opportunities, key actors, with conclusions and recommendations for EU support (both political and operational). Updated Gender Country Profiles remain valid for 5 years, after which they are to be reviewed and updated by the EU Delegations.

¹⁴ EU Delegations also have the option of further developing more specific Gender Sector Analyses to complement the Gender Country Profile, so as to identify major gaps, constraints and opportunities for gender equality in a given sector.

¹⁵ ECDPM, '[Integrating the Gender Action Plan \(GAP III\) into the EU programming process](#)', Webinar, 31 May 2021. At 13:00, an EU official mentions that DG INTPA has trained 600 people on GAP III by May 2021.

¹⁶ European Commission and European External Action Service, Template document for GAP III Country-Level Implementation Plans, 2021, pp. 3-5.

¹⁷ European Commission and European External Action Service, Template document for GAP III Country-Level Implementation Plans, 2021, pp. 2.

¹⁸ CONCORD, 'The Gender Action Plan III - Learning the lessons and kicking off implementation in dialogue with Civil Society Responses by DG INTPA and DG NEAR', 2021, pp. 2, 4.

¹⁹ European Commission and European External Action Service, *op. cit.*, 2021; European Commission, *op. cit.*, February 2021.

²⁰ European Commission, '[International Development Aid](#)', accessed 14 October 2021.

²¹ European Parliament and European Council, '[Regulation \(EU\) 2021/947 establishing the Neighbourhood, Development and International Cooperation Instrument](#)', 9 June 2021, para. 44.

²² Capacity4Dev, Agenda for the 25 November 2021 Structured Dialogue on GAP III implementation, accessed 6 December 2021.

²³ For more on this, see <http://www.peacewomen.org/WPS-Financing>; and Radhika Coomaraswamy, '[Financing of the Women, Peace and Security Agenda](#)', Global Study on the Implementation of UNSCR 1325, Chapter 13, UN Women, pp. 372; EPLO, '[Maximising EU support to the Women, Peace and Security Agenda](#)', Proposal statement, 2017.

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- ²⁴ European Parliament Research Service “[EU Gender Action Plan 2016-2020 at Year One: European Implementation Assessment](#)”, Isabelle Ioannides, October 2017, pp. 60.
- ²⁵ Chloe Teevan et al., ‘[Taking the gender agenda forward in EU programming](#)’, ECDPM, April 2021, pp. 5.
- ²⁶ European Commission and European External Action Service, *op. cit.*, 2021, pp. 1.
- ²⁷ Interviews with EU officials, July 2021.
- ²⁸ EU official during Structured Dialogue on GAP III implementation, 25 November 2021.
- ²⁹ ECDPM, “[How the women, peace and security agenda is integrated into the EU’s gender action plan](#)”, Briefing Note, Sophie Desmidt, October 2021, pp. 4.
- ³⁰ Interviews with EU official, July 2021.
- ³¹ Interviews with EU official, July 2021.
- ³² Interviews with EU official, July 2021.
- ³³ This paper, however, cannot comment further on the quality of the outsourced processes and consultations (including their degree of inclusivity) as information on these aspects was not available at the time of writing.
- ³⁴ Participant during Structured Dialogue on GAP III implementation, 25 November 2021.
- ³⁵ Participant during Structured Dialogue on GAP III implementation, 25 November 2021.