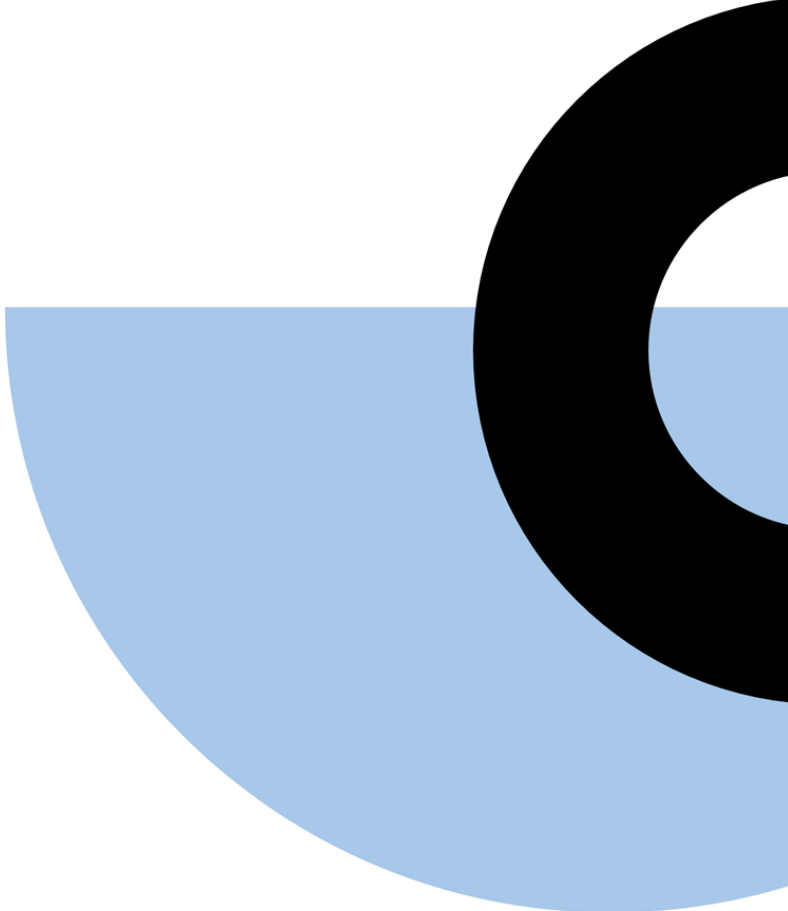




**Advancing Progress on Women, Peace and Security:
Opportunities for GAP IV**

CSDN Discussion Paper

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European Peacebuilding Liaison Office (EPLO)

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Executive Summary

In 2027, the EU is expected to deliver a new Gender Action Plan (GAP) IV, as well as a new Action Plan on Women, Peace and Security (WPS). The EU institutions are also currently negotiating their next seven-year budget, the Multiannual Financial Framework (MFF). Together, these frameworks provide important possibilities and resources for the EU to deliver on its commitments, obligations and ambitions regarding the WPS agenda.

These documents are being drafted in a constrained environment: Increasing levels of violent conflict, growing pressure on Official Development Assistance (ODA), shrinking civic space, and organised backlash against gender equality and women's rights challenge the implementation of the EU's WPS commitments. Against this backdrop, it is important to identify approaches that ensure impact and protect ambition, and to identify how to ensure that these frameworks and tools can reinforce each other, to help enable the EU to deliver on core WPS principles and objectives – Participation, Prevention, Protection and Relief and Recovery, as well as the wider EU WPS agenda set out in the EU's Strategic Approach to WPS. This includes identifying how GAP IV implementation, in alignment with the upcoming Action Plan on WPS and the next MFF can help protect commitments to core principles of the WPS agenda against backsliding.

The current EU policy commitments and frameworks for WPS are strong and extensive. While efforts have been made to try to ensure coherence between these frameworks in terms of setting objectives, standardising indicators and measuring progress, there are still significant gaps in transparent reporting on these commitments and in ensuring coherence between reporting and accountability. Clearer targets, implementation plans and reporting for work on WPS will be essential during the next policy cycle. The proposed Performance Framework Regulation for the next EU MFF¹ suggests an overhaul and standardisation of the indicators for the next budget cycle. It currently contains hardly any proposed indicators relevant to WPS, and the gender-mainstreaming of other sections related to WPS in the indicators is low.

Having clear targets for gender equality actions under GAP III and the current regulation for external action, the Neighbourhood, Development and International Cooperation Instrument – Global Europe (NDICI-Global Europe)², has helped the EU to expand the number of projects with gender equality as a principal or significant objective. The fact that the targets are legally codified in the current NDICI-Global Europe has given them stronger weight. Including clear targets for gender equality as a significant and principal objective in the next GAP IV, and codifying them in the next proposed Global Europe regulation³ for external action under the 2028-2034 MFF, will be key for effective implementation. Additionally, a specific target for funding for women's civil society

¹ European Commission, [Proposal for a Regulation of the European Parliament and the Council establishing a budget expenditure tracking and performance framework and other horizontal rules for the Union programmes and activities](#) (16 July 2025)

² <https://eur-lex.europa.eu/eli/reg/2021/947/oj/eng>

³ Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing Global Europe (16 July 2025). https://commission.europa.eu/publications/global-europe_en

organisations (WCSOs)⁴ in the GAP IV would be an important element to help focus funding support towards WCSOs as they carry out critical work for gender equality. Clearer tracking of funding for CSOs / WCSOs in conflict-affected countries would support with ensuring that WCSOs in conflict-affected countries, who shoulder much of the important work of WPS implementation and have a wealth of expertise, receive much-needed funding.

While funding to and partnering with WCSOs and women peacebuilders and experts in conflict-affected contexts through programming is essential, women's CSOs and women experts are still too often sidelined from policy and political dialogues on peace and security that are not necessarily related to WPS or gender equality.

The EU's pivot towards the Global Gateway for much of its external financing represents a significant shift in the way it conducts external funding. When designing the GAP IV, the next WPS Action, the Performance Framework Regulation, and Global Gateway working processes, this paper recommends for the EU to maintain human rights obligations and international sustainable development goals, for the EU to be accountable to and prioritise the needs and demands of communities and rights holders, and for integrating a 'do no harm' approach when implementing these large scale investments, as they interact with peace and security dynamics, the environment, and may impact the human rights of local communities including women, girls and minorities in partner countries.

Key recommendations:

1. Increase and expand funding to women's CSOs, women-led, and feminist organisations working across the four pillars of the WPS Agenda – Participation, Prevention, Protection, Relief and Recovery - under GAP IV and the next MFF.
2. Overhaul the proposed indicators in the proposed Performance Framework Regulation for the next MFF to align them with the EU's WPS commitments, existing WPS indicators, and the EU's other international commitments regarding gender equality, human rights, sustainable development, climate and the environment.
3. Ensure that infrastructure and other spending under Global Gateway and Team Europe initiatives is conflict- and gender-sensitive, follows a human-rights based framework, and does not do harm to the peace, security and human rights of women, girls and minorities living in partner countries.
4. Ensure political and policy dialogue with women peacebuilders, mediators, conflict prevention and human rights experts and CSOs in conflict-affected countries to set funding priorities in the implementation of Global Europe, and to jointly identify political priorities in partner countries.

⁴ In the following, the term women CSOs encompasses women-led and inclusive peacebuilding organisations, actors, initiatives, and networks, women's peacebuilding movements, women peacebuilders and mediators, women's rights organisations, women human rights defenders, feminist and LGBTIQ+ peacebuilding organisations.

Purpose and outline of the paper

This CSDN Discussion Paper analyses how the EU's forthcoming Gender Action Plan IV can strengthen the implementation of the WPS agenda across EU external action through translating the EU's WPS commitments into programming, targets, indicators and accountability mechanisms. It assesses the extent to which GAP III has contributed to the implementation of the EU's WPS agenda; identifying strengths, gaps, and lessons learned from GAP III implementation, with particular attention to support for women's rights organisations and women-led organisations in conflict-affected contexts. It explores potential alignment, and potential gaps, regarding the EU's upcoming WPS Action Plan, the next GAP IV, and the proposed Global Europe instrument under the next 2028-2034 MFF. It presents actionable recommendations for ensuring that GAP IV effectively advances the EU's WPS agenda, including in a context of potentially reduced financial and human resources.

The paper first provides an overview of the EU's different, connected policy commitments to gender equality and WPS, and an overview of upcoming updates to those policy frameworks. It then reviews progress on delivering commitments on WPS through GAP III so far, including through discussing indicators used to measure WPS implementation under the GAP III. It then discusses how GAP IV, as a specific tool for guiding external spending, and in complementarity to other EU tools, can help advance the four core pillars of the WPS.

The EU's WPS policy framework and Gender Action Plan III: Setting the scene

This section provides an overview of the key existing policy frameworks that guide the EU's work on WPS, Gender Equality and external action financing: [The EU Strategic Approach to Women, Peace and Security](#), [The EU Action Plan on Women, Peace and Security](#), the [2022 EU Council Conclusions on Women Peace and Security](#), and the [EU's Gender Action Plan III](#). All these frameworks are extensive, and so the below section focuses on where the WPS commitments, GAP III and programming commitments and monitoring of these commitments intersect, to guide clear forward-looking recommendations for advancing WPS under the next WPS Action Plan and the next EU Gender Action Plan IV.

■ EU Strategic Approach to Women, Peace and Security (2018)

The [EU's Strategic Approach to Women, Peace and Security](#) was adopted by the Council in 2018 as part of WPS [Council Conclusions](#).

The Strategic Approach to WPS is extensive, and rests on six ‘fundamental aspects’⁵:

1. *The ‘emphasis on women’s rights, leadership and agency in all areas of policy and programming related to peace and security... [and] the prevention of all forms of violence including sexual and gender-based violence’ applying to ‘all EU external instruments: including CSDP missions and operations, and all policy areas.’*
2. *The ‘commitment to analyse and address gendered root causes of conflict and of gender inequality, inside and outside the EU, at the early planning of all EU external actions.’*
3. *‘Full support (political and financial) to local, national, and international civil society organisations, including grassroots and women’s activists, who help build peace, challenge gender norms and prevent sexual and gender-based violence.’ Including where ‘women are in leadership roles, define strategy formation, promote local ownership and contribute to building national capacities.’*
4. *‘The commitment to systematically integrate a gender perspective, based on gender analysis, into all fields and activities in the domain of peace and security, including all political and strategic dialogues, human rights dialogues, all related policy formulations and policymaking processes, research, analysis and assessment, planning and conduct, as well as the relevant monitoring, evaluation and reporting processes.’*
5. *‘Gender equality as a key objective of all EU external action, including, but not limited to, development, preventing and countering violent extremism, counterterrorism and migration.’*
6. *The ‘systematic integration of a gender perspective into all EU conflict prevention and peacebuilding interventions/mechanisms, as well as into the EU requirements for implementing partners.’*

There is an extensive list of both policy and programming-based commitments in the Strategic Approach which are relevant to programming under the Gender Action Plans and how they connect to WPS policy. One commitment sets out to ‘develop and use indicators for [...] actions to implement the strategic approach on WPS.’ This shall include sex-disaggregated data, regular exchanges with civil society on WPS including with women’s organisations, integrating WPS indicators from other frameworks such as the Beijing Platform for Action, Member State National Action Plans and EU Gender Action Plan II, and integrating them into the WPS indicator framework, harmonising reporting systems within the EU, and providing parameters, systems and guidelines for EU member states to record their work and aggregate data on at a regional level.⁶

Some of these indicators are included under the EU Action Plan on WPS, and its associated indicators and reporting mechanisms as well as GAP III indicators, but some have not.

⁵ EU Strategic Approach, pages 8 – 9

⁶ Strategic Approach, page 58

■ EU Action Plan on Women, Peace and Security (2019 – 2024 / 2027)

The [EU's Action Plan on WPS](#) (hereafter: AP) is supposed to guide implementation of the EU Strategic Approach to WPS, UN Security Council Resolution (UNSCR) 1325 and subsequent resolutions. The AP was adopted for the period 2019-2024 and then extended until the end of 2027 alongside the GAP III extension. It focuses on six objectives 1) Participation 2) Gender Mainstreaming 3) Leading by Example 4) Prevention 5) Protection 6) Relief and Recovery.

Each objective has several actions – either short, medium or long-term - attached to the objective. Overall, the document specifies thirty indicators to measure progress towards these objectives. The document states that there will be mid-term and final-reporting reviews against these indicators, and that these will be merged with reporting on GAP. However, not all indicators under the AP have been translated into GAP III indicators, and the indicators of the AP are therefore not incorporated in their entirety in EU reporting.

■ EU Council Conclusions on Women, Peace and Security (2022)

In 2022 the Council of the EU adopted [new, shorter Conclusions on WPS](#) to renew its commitment to the agenda in a changing geopolitical environment. In these Conclusions, the Council emphasised the importance of working with civil society, and specifically grassroots women's organisations, which will be relevant to the drafting of the next Gender Action Plan, and external financing under the future Global Europe instrument:

“The Council [...] values the critical role of civil society, grassroots women's organisations, peacebuilders and human rights defenders through active engagement, consultation and participation, including in humanitarian and crisis context... the Council invites [all EU bodies and representatives] to further strengthen their cooperation and consultation with civil society organisations, including women-led organisations, to ensure gender equality and the empowerment of women and girls. The Council encourages Member States to include women-led and women-focused civil society organisations in policy and project design, implementation, monitoring and evaluation of the WPS agenda.”

■ EU Gender Action Plan III (2021 – 2027)

The [EU's Gender Action Plan \(GAP\) III](#) is a strategic policy document, jointly authored by the EU Commission and the High Representative of the Union for Foreign Affairs and Security Policy (HR/VP). It sets out the EU's objectives for integrating gender equality in

its external action and guides the programming of EU external budgets and the work of the EU institutions, delegations and, to a degree, Member States.

The EU's GAP III takes a three pronged approach to guiding the EU's work on gender equality in its external action through: 1) Gender mainstreaming, 2) targeted actions, and 3) political dialogue. GAP III sets out that '85% of all EU actions will have gender equality as a significant objective by 2025.'⁷ Additionally, it commits every EU Delegation (EUD) to having at least one action where gender is a principal objective.⁸ The work under GAP III is to be governed by three core principles: a gender-transformative approach, addressing intersectionality and other forms of discrimination, and a human rights-based approach.⁹

GAP III also contains three 'minimum programming standards' that apply to EU external actions. Firstly, that programmes should be based on an updated gender analysis. Secondly, that monitoring and evaluation should use gender-sensitive and sex-disaggregated indicators and statistics. Thirdly, that if an action is considered not to contribute to gender equality, this must be justified on the basis of the gender analysis.¹⁰

There are five key pillars of action in GAP III.

1. Gender equality as a cross-cutting priority.
2. Strategic country, regional and multilateral engagement
3. Six thematic areas of engagement – one of which is Women, Peace and Security.
4. The EU leads by example
5. Reporting and communicating results.

To translate the GAP's commitments to country level, EU Delegations are expected to produce Country Level Implementation Plans (CLIPs) for the GAP, based on Gender Country Profiles.¹¹ CLIPs should specify key policy priorities, actions and objectives of focus of the Delegation, in line with the GAP III. The GAP explicitly states that in addition to working with national and local authorities, they should also work with CSOs, women's rights organisations, human rights defenders, young people, and religious and faith-based organisations.¹²

WPS is included under GAP III as a thematic area of engagement and the plan makes specific commitments, alongside those already made in the Strategic Approach and the Action Plan. It recognises "inequalities coupled with exclusion of women from power, opportunities, services and security create a fertile ground for conflict and gender-based violence", and that "preventive action should adopt a risk-, needs- and rights-based approach."¹³ It emphasises that the EU's WPS objectives should be achieved through the diplomatic and political engagement of EU leadership and ensuring the participation and

⁷ GAP III, page 3

⁸ GAP III, page 4

⁹ Ibid.

¹⁰ GAP III, page 5

¹¹ GAP III, page 7

¹² Ibid.

¹³ GAP III, page 18

leadership of women in peace and security contexts¹⁴, thereby emphasising the need for action in addition to programming to achieve the EU's goals on WPS.

GAP III, in line with the WPS Action Plan, contains the following specific commitments regarding EU commitments on Women, Peace and Security:¹⁵

- *supporting and conducting capacity-building and mentoring on women's leadership, for women negotiators and mediators, to improve their effectiveness and the quality of their participation in peace processes;*
- *working towards reaching at least 33% of women participating in all EU activities and projects related to peace processes;*
- *establishing and institutionalising consultative mechanisms on all conflict-related issues with grassroots women activists and CSOs, both in Member States and in conflict-related settings, where there are CSDP missions and operations;*
- *rolling out mandatory training on mainstreaming gender perspectives for all staff at HQ, EU delegations, CSDP missions and operations, etc.;*
- *promoting and supporting inclusive policies/activities across the whole WPS agenda with full and equitable participation, also by men and boys;*
- *promoting the strengthening of the rule of law, the criminal justice system through transitional and restorative justice, and Security Sector Reform (SSR), to end impunity for perpetrators of SGBV crimes;*
- *promoting the provision of medical, psycho-social, legal and safety support to all victims/survivors of conflict-related sexual and/or gender-based violence/SGBV.*

The [30 indicators are contained originally in the WPS Action Plan](#), and most of them have been translated over in the [GAP III Objectives and Indicators Staff Working document](#).

Current updates to frameworks affecting the EU's commitments to WPS under the Gender Action Plan

■ Gender Action Plan IV and updating of the EU Action Plan on WPS

The European Commission is currently preparing its next Gender Action Plan (GAP IV), which is expected to be presented in spring 2027, and will succeed GAP III. The European Commission's Directorate General for International Partnerships (DG INTPA) is

¹⁴ Ibid.

¹⁵ GAP III, page 17

leading on the drafting process, in consultation with the European External Action Service (EEAS) and other EU entities.

Later in 2027, the EEAS is expected to present the next EU Action Plan on WPS covering the period 2028 to 2034, following the current 2019-2027 WPS Action Plan.

■ **The Global Europe instrument in the 2028-2034 Multiannual Financial Framework**

In parallel, the Commission, EU Member States, and Parliament, are currently designing the next 2028-2034 Multiannual Financial Framework (MFF), the EU's seven-year budget. The Commission presented its proposal for Regulation establishing Global Europe, the regulation for external action under the next MFF, in July 2025 with over €200 billion reserved for external action, a significant increase. Negotiations between Member States are now underway in the Council of the EU to agree on the overall MFF amount and its different distribution areas (Headings) by the end of 2027. Following this, the European Parliament, the Council of the EU and the European Commission will discuss the overall amount for the MFF and its Headings as the European Parliament in particular must give its consent to this overall budget.

Both the headline amounts for Global Europe, as well as the details regarding how this money is spent, managed and tracked, are significant for progress on WPS and for the rights of women and minorities globally. Negotiations on the headline amounts for Global Europe as well as the details of the instrument are ongoing and therefore still subject to change.

Within the third proposed heading for the next MFF, Global Europe, the main funding instrument for external action is expected to cover the EU's external spending across four areas previously funded under distinct instruments: Enlargement and Pre-Accession Assistance; Geographic Development and International Partnerships (including on topics such as development, human rights, global health, security, migration, and civil society); The Global Gateway Initiative; and Crisis Response, Security and Humanitarian Aid (including unallocated funds for crisis, conflict and humanitarian response; as well as funds for Common Foreign and Security Policy (CFSP)). The Council issued its Partial General Approach on the Global Europe regulation¹⁶ in June 2026 (with several issues, including budget lines per pillar, left to finalise). The European Parliament is negotiating its own position which is expected for November 2026. From November 2026, the Council, Parliament and Commission are expected to negotiate the final text.

¹⁶ General Secretariat of the Council: Proposal for a Regulation of the European Parliament and of the Council establishing Global Europe - Partial general approach (11 June 2026)
<https://www.consilium.europa.eu/en/press/press-releases/2026/06/16/mff-2028-2034-council-agrees-partial-mandate-on-global-europe/>

Global Europe funding will be disbursed by the EU institutions with an external focus, including through DG INTPA, DG ENEST (Directorate General for Enlargement and the Eastern Neighbourhood), DG MENA (Directorate General for the Middle East, North Africa and the Gulf), DG ECHO (DG for European Civil Protection and Humanitarian Aid Operations), the EEAS and FPI (the European Commission's Service for Foreign Policy Instruments.) It is supposed to apply across all partner countries and regions.

■ Gender targets

The current GAP III applies to the NDICI-Global Europe instrument under the 2021-2026 MFF, both as a policy framework and in terms of legally binding funding targets. The gender equality targets set out in GAP III are aligned with and legally codified in the NDICI-Global Europe regulation. Under the NDICI-Global Europe, 85% of EU actions funded under the instrument must have gender equality as a *significant or principal* objective (OECD-DAC marker G1; and 5% of actions under the instrument must have gender equality as the *principal* objective (OECD-DAC marker G2.) The legally codified funding targets in the current NDICI-Global Europe, tied to GAP III, have been identified as a strength of the current framework¹⁷. Several CSOs and Brussels-based networks such as EPLO, CONCORD and the Kvinna till Kvinna Foundation have asked for specific targets to remain included in Global Europe¹⁸.

There is an ongoing discussion about what gender equality targets and mainstreaming will look like under the next Global Europe instrument. In July 2025, the Commission proposed the Performance Framework Regulation for the next MFF as a framework for tracking spending and performance of the overall budget, which merges thousands of currently-used indicators, dispersed across different monitoring and performance documents, into one single main framework of around 900. Within this new framework (which may remain complementary to existing reporting frameworks), the European Commission propose to mainstream gender equality horizontally and apply unified rules for tracking expenditure, rather than setting explicit quantitative targets for gender-equality related expenditure.

The European Parliament's FEMM committee has pushed back against the lack of targets in the Global Europe regulation¹⁹, calling for the 85% target for G1 actions (gender equality as a significant objective) to be maintained, as well as for the proportion

¹⁷ See e.g. European Parliament: Directorate-General for Citizens' Rights, Justice and Institutional Affairs, Debusscher, P. and Vila, B., Assessing the third Gender Action Plan (GAP III) as a foundation for designing GAP IV – Lessons learned for the post-2027 framework, European Parliament, 2026, <https://data.europa.eu/doi/10.2861/6720815>

¹⁸ See e.g. Kvinna till Kvinna Foundation (2026) EU Gender Action Plan IV: Bridging the WPS gap. <https://kvinnatillkvinna.org/publications/eu-gender-action-plan-iv/> and <https://concordeurope.org/our-work/equality-and-leaving-no-one-behind/gender-equality/>

¹⁹ EP FEMM committee: Opinion on the proposal for a Regulation of the European Parliament and of the Council establishing Global Europe (3 June 2026) https://www.europarl.europa.eu/doceo/document/FEMM-AD-785122_EN.pdf

of G2 actions (gender equality as a principal objective) to be increased to 20%. The opinion also called for a minimum of 5% of spending under the Global Europe instrument to be allocated to Women's Rights' Organisations and Women's CSOs, in line with civil society recommendations mentioned above.

The draft Global Europe report of the European Parliament (led by AFET and DEVE committees) also asks to include gender targets in the Global Europe regulation²⁰. The final position of the European Parliament on these targets will only be established after the plenary vote. This will then become the official position of the Parliament in the MFF negotiations going ahead.

In the Council's Partial General Approach on Global Europe, member states agreed that the *'Instrument should uphold and apply the objectives of the EU Gender Action Plans, including relevant targets.'*²¹

■ Performance Framework Regulation

In July 2026, as part of its MFF package, the EU proposed the [Performance Framework Regulation](#)²², a merged set of rules and tracking indicators to plan, manage and track objectives, spending and results under the next MFF. The proposed Framework consolidates and harmonises thousands of indicators that were previously contained in different documents into approximately 900 indicators.

The Commission's proposed Regulation contains indicators pertaining to Peace, Conflict and Security; Humanitarian Action, Rights and Democracy, and other areas relevant to WPS, and to gender equality. Notably, there are hardly any indicators relevant to WPS. There are many indicators across these three categories where gender equality could be mainstreamed, or where a specific gender-focused indicator could have been included, but where this is not currently the case. Hardly any of the WPS indicators from the current WPS Action Plan and GAP III, have an equivalent or similar indicator in the proposed Performance Framework Regulation.

The Commission is expected to present technical guidance on the tracking methodology to support gender mainstreaming through the Performance Framework Regulation by November 2026.²³

The [opinion of the EP FEMM committee on the Performance Framework Regulation proposal](#) contains extensive amendments to the indicators proposed by the

²⁰ EP AFET and DEVE committees: Draft report on the proposal for a regulation of the European Parliament and of the Council establishing Global Europe (17 April 2026)

https://www.europarl.europa.eu/doceo/document/CJ19-PR-784222_EN.pdf

²¹ Partial General Approach, page 26

²² https://eur-lex.europa.eu/resource.html?uri=cellar:bb24b1ec-62fc-11f0-bf4e-01aa75ed71a1.0001.02/DOC_4&format=PDF

²³ Gender Equality Strategy 2026. The EC also asked member states to specify this by November 2026.

Commission, as well as several other amendments to the text, including specific provisions relevant to WPS. The Council has also introduced changes to the indicator framework as part of the partial mandate for negotiations with the Parliament, but these changes do not introduce WPS-related amendments to the indicators covering Peace, Conflict and Humanitarian Aid²⁴.

■ Global Gateway

Another strategic framework of the EU that is to consider when integrating WPS in EU external action is the Global Gateway initiative. Global Gateway has been in place since 2021 until present and is centres on using overseas development aid (ODA) with the objective to incentivise and de-risk large-scale private sector investments in partner countries, primarily in large scale infrastructure. It currently draws on various EU financial and budgetary instruments, including the NDICI-Global Europe and the European Fund for Sustainable Development Plus (EFSD+), whose guarantees help mobilise investment by reducing financial risks. Global Gateway is supposed to be implemented through a ‘Team Europe’ approach - bringing together the EU, Member States, and their implementing agencies and public development banks. The European Investment Bank (EIB) and the European Bank for Reconstruction and Development (EBRD) are among the financial institutions involved.

The Global Gateway strategy has marked a significant shift in the way that the EU conceives of and implements development projects in partner countries. Projects can be proposed directly by private sector companies or strategically identified by the EU or by partner country governments. At present, many of the projects are focused on large-scale infrastructure and private sector actors are involved in decision-making and implementation. There is no requirement to carry out needs-assessments of communities and rights holders on which to base projects, and instead there is a pivot towards projects being chosen due to strategic EU or partner governments strategic interests. Several CSOs have raised concerns about this approach, and shared concerns regarding conflict sensitivity, human rights, sustainability, effective community/rights-holder power over decision-making, and effective complaints mechanisms²⁵. Additionally, many of the investments are taking place in fragile and conflict-affected contexts and require respective conflict-sensitive and gender-sensitive approaches to be integrated throughout the project / investment cycle to avoid unintentionally backsliding on WPS commitments or doing harm to the peace, security and rights of women, girls and minorities living in partner countries.

²⁴ General Secretariat of the Council: Proposal for a Regulation of the European Parliament and of the Council establishing a budget expenditure tracking and performance framework and other horizontal rules for the Union programmes and activities - Partial mandate for negotiations with the European Parliament (26 June 2026) <https://data.consilium.europa.eu/doc/document/ST-11033-2026-INIT/en/pdf>

²⁵ See e.g. Counter Balance, Eurodad, Oxfam: Who profits from the Global Gateway? The EU's new strategy for development cooperation (8 October 2024) <https://www.oxfam.org/en/research/who-profits-global-gateway>

The EU's June 2026 [Council Conclusions on Global Gateway](#) state that the “Global Gateway strategy is based on *“democratic values and high standards, including good governance and transparency, respect for the rule of law, human rights and gender equality, environmental and social sustainability.”* The Council also underlined that Global Gateway should be aligned with the 2030 Sustainable Development Goals, the Paris Agreement, and other frameworks, and underlined *‘the need for enabling environments, civil society participation and the rule of law and good governance, including transparency and accountability throughout the project cycle to ensure sustainability, local value creation and lasting development impact.’* The conclusions also called for the full respect of the UN Guiding Principles on Business and Human Rights. It remains open how these commitments are translated into practice, and how civil society is meaningfully consulted from the outset.

Implementation of WPS under GAP III - Lessons learned

■ Implementation of the core WPS pillars through GAP III

The GAP III Intermediate Evaluation²⁶ assessed progress regarding the four key pillars of WPS, plus the commitment of the EU to ‘lead by example’. In the findings, the evaluators summarised that:

- EU support has helped women’s leadership and **participation** in WPS, but these gains are *‘fragile without political support’* – especially in a context of *‘shrinking civic space, insecurity, and short funding cycles.’*²⁷
- While there have been several community-level approaches funded to work on prevention from a gender perspective, these remain *‘small-scale and scattered.’* It noted that **prevention** remains one of the weaker parts of the EU’s work on WPS.²⁸
- Regarding **protection**, the intermediate evaluation notes that while important work has been undertaken to support survivors of SGBV, *‘support for women human rights defenders and frontline activists remains uneven.’*²⁹ This is notable in the context of increasingly shrinking civic space for human rights defenders, as well as in the context of the proposed Performance Regulation by the Commission, which does not include gender-specific targets for human rights defenders.
- Regarding **relief and recovery**, work on this was strongest when *‘humanitarian assistance was connected to long-term empowerment,’* including being *‘long-*

²⁶ European Commission: Directorate-General for International Partnerships and ADE s.a., [Directorate-General for International Partnerships, ADE s.a.], Intermediate evaluation of the implementation of the EU Gender Action Plan III (2021-2027) – Final report. Volume I, Main report, Publications Office of the European Union, 2025, <https://data.europa.eu/doi/10.2841/9488454> (8 December 2025)

²⁷ Intermediary Evaluation, page 54

²⁸ Ibid. Page 55

²⁹ Ibid. Page 54

*term, locally anchored, and linked to structural reforms such as care systems, labour protections and environmental justice.*³⁰

- Regarding the commitment of the EU to ‘**lead by example**’ in the EU’s current Action Plan on WPS, the intermediate evaluation found that a high level of policy level commitment on this, but ‘inconsistent’ operationalisation of this commitment, lack of resourcing for it, and noted that it was highly dependent on individual champions.³¹

■ **Strengthened funding and policy dialogue with women’s CSOs**

Women’s rights organisations and women peacebuilders play a crucial role in advancing the peace and security of women, girls and minorities around the world. They hold essential expertise regarding WP; and undertake conflict prevention, relief and recovery, protection of and advocacy for their communities, and conflict mediation and advocacy for their rights. However, women’s organisations remain chronically underfunded globally.

The share of EU funding to EU funding to WCSOs has increased in the first part of the GAP III cycle³². The GAP III Intermediate Evaluation also noted that EU support had ‘strengthened the institutional and operational capacity of national and local CSOs and WROs on GEWE,’ that the ‘EU was instrumental in creating and expanding platforms for CSOs and WROs to engage in policy dialogue and decision-making’, and that ‘EU support strengthened inclusive networks and coalitions.’³³

EU support to these organisations EU should not only take the shape of funding and programming, but also channel through inclusion in policy and political dialogues on peace and security. Evaluations and reviews of GAP have all demonstrated the value of policy dialogue between the EU and WCSOs / WROs³⁴, have also highlighted the persistent barriers to this meaningful engagement, including the limited inclusivity of dialogue, a lack of transparency, and uneven participation.³⁵ Additionally, barriers to local WROs advancing gender equality and women’s rights, especially in fragile settings, noted by the intermediate evaluation were short funding cycles, administrative burdens and limited access to core and flexible funding.³⁶

³⁰ Ibid., page 55

³¹ Ibid.

³² See e.g. European Commission: Joint mid-term report on the implementation of the EU Gender Action Plan (GAP III) (20 November 2023) <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52023JC0036>

³³ Ibid., page 53

³⁴ Ibid., pages 49-50

³⁵ Ibid.

³⁶ Ibid., page iv

For WCSOs working in conflict-affected countries to be able to effectively support communities and rights holders, they need to be able to commit to long-term presences – including retaining staff and investment in office spaces and long-term, trusted relationships with the communities they work in. They also need to be able to respond quickly to often changing and unpredictable circumstances. Many civil society organisations have advocated for core, long-term and flexible funding to help enable organisations work in this way. Regarding the sidelining of women’s organisations and women experts from policy and political dialogues not on explicitly gender-focused issues. For example the Kvinna till Kvinna Foundation has noted that they:

‘often see women experts, and organisations with gendered expertise, excluded from conversations which are not specifically with a gender focus. In addition, women’s and feminist organisations are often directed to speak to gender focal points—who often have a more programmatic mandate, and are not at senior level—even if women’s organisations want to discuss issues which are political and which require the engagement of more senior staff.’³⁷

For example, women peacebuilding experts from conflict-affected countries may be directed to speak to gender focal points at Delegations, or gender specialists in Brussels, when the more suitable contact for them to engage in dialogue with are staff covering the peace and security file. A key conclusion of the Intermediate Evaluation of GAP III is that when the EU ‘linked its local interventions with national /global policy influence’ they achieved better results. However, the evaluators noted that there was often ‘inconsistent coordination and limited use of diplomatic influence’ here.³⁸

■ Progress on Gender Targets

The most recent EU Commission report Recent Commission reporting for 2021-2024 indicates³⁹ that:

- Gender equality was a significant or principal objective (G1 / G2) in 82% of new 2024: 89% INTPA, 87% DG NEAR, 82% FPI, 77% for other DGs.
- Gender equality was a significant or principal objective (G1 / G2) in 79% of actions cumulatively in 2021 – 2024
- For NDICI-Global Europe, 84% of actions in 2021-2024 had gender equality as a significant or principal objective (G1 / G2), with 4% having it as a principal objective (G2)

³⁷ Kvinna till Kvinna Foundation 'EU's Gender Action Plan III: Halfway there? Observations at the mid-term of the EU GAP III' (27 June 2023)

³⁸ Intermediary Evaluation, page ii

³⁹ European Commission: 2025 Annual Report on the implementation of the European Union's External Action Instruments in 2024 (3 December 2025) <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52025SC0390>

- 63% of blending operations and 69% of guarantees has gender equality as a significant or principal objective in 2021 -2025.

This demonstrates a clear expansion of mainstreamed projects as well as the importance of clear targets for increasing funding for gender equality. However, there are still challenges in the way the gender markers are used. Firstly, while the breadth of the target of 85% has been met, gender mainstreaming ‘remains uneven in quality and depth.’⁴⁰ Additionally, OECD-DAC Marker guidelines stipulate that the total budget of a project is counted being for gender equality even if one objective pertains to this goal.⁴¹

■ Progress on WPS indicators outlined in WPS Action Plan 2019-2027

Despite the importance of tracking progress on WPS implementation through GAP III – which, as explored above is one of the key mechanisms for overall progress on the 30 WPS indicators - this remains challenging based on publicly available documents. This is partly because the current tracking systems for monitoring WPS indicators are only partially used, and because their application remains inconsistent and insufficiently coherent.

The documents where Women, Peace and Security Indicators were tracked specifically throughout this GAP III include: the European Commission’s

- 2022 Annual Reporting
- 2023 Annual Reporting
- 2024 Annual Reporting
- 2023 Mid-Term Report on GAP III

From a review of these documents, it is difficult to assess what progress has been made on many of the indicators due to lack of reporting: many of the indicators have not been reported on in these documents. However, there are some indicators where there has been more substantial reporting and progress made, specifically relating to:

- indicators relating to EU-internal gender-responsive leadership – many of which have been fully or partially achieved;
- targets regarding the numbers of high-level statements made including content on WPS, WPS being included as priorities in country, and engaging with civil society on WPS;
- reporting on SGBV indicators has taken place, but reporting is not comprehensive regarding the projects and actions funded.

⁴⁰ Intermediary Evaluation, page ii

⁴¹ OECD, 2016

■ Human resources, institutional capacity and staffing

Human resources and capacity play a significant role in the extent and quality of gender equality commitments at EU Delegation and at Headquarters.⁴² In EU Delegations, Gender-Focal Points are often over-stretched and under-resourced⁴³, with the gender equality portfolio only one part of their role, and they may sit in the International Partnerships section of the EU Delegation without any direct access to the Political Section. The Intermediate Evaluation on GAP III found that gender-responsive leadership and staff capacity proved decisive for GEWE performance under GAP III, and there is often a reliance on individual champions, which means limited sustainability – especially in fragile contexts.⁴⁴ These issues all present ongoing challenges for the EU in implementing the WPS agenda through its work guided by GAP III/IV. Successful implementation is tied to sustained, strategic and coordinated engagement, to aligning programming with political action, and basing these on ongoing engagement and dialogue with women peacebuilders, rights activists and peace and security experts in conflict-affected countries.

■ Gender equality under Global Gateway

While Global Gateway is still a comparably new initiative, researchers and evaluators have documented concerns about the extent to which gender-sensitive approaches have been embedded into its design and implementation.⁴⁵ They have raised concerns that the strong focus on business and investment risks undermining a more values and human-rights-orientated approach.⁴⁶ ODI Europe have documented that gender focal points at EU delegations are now increasingly expected to identify projects which integrate EU interests, and are expected to engage more closely with private sector and financing institutions. This represents a shift from former approaches that placed a greater emphasis on working with CSOs.⁴⁷

The Intermediate Evaluation of the GAP III found that gender equality was mainstreamed less in the Global Gateway Flagship Projects in comparison to other EU external action, and that mainstreaming gender equality into infrastructure projects remains particularly challenging. The evaluators note that the development financing institutions they spoke

⁴² See e.g. ODI Global 'From GAP III to GAP IV: Rethinking the EU's global support for gender equality' (3 October 2025) <https://odi.org/en/publications/from-gap-iii-to-gap-iv-rethinking-the-eus-global-support-for-gender-equality/>

⁴³ Intermediate Evaluation, page 55

⁴⁴ Ibid., page ii

⁴⁵ Ibid., page xx

⁴⁶ Claire Kumar, Karen Hargrave, Nerea Craviotto, Jessica Puduserry(ODI Global) 'The case for development in 2025: exploring new narratives for aid in the context of the EU's new strategic agenda' (4 July 2025) <https://odi.org/en/publications/the-case-for-development-in-2025-exploring-new-narratives-for-aid-in-the-context-of-the-eus-new-strategic-agenda/>

⁴⁷ ODI Global 'From GAP III to GAP IV: Rethinking the EU's global support for gender equality' (3 October 2025) <https://odi.org/en/publications/from-gap-iii-to-gap-iv-rethinking-the-eus-global-support-for-gender-equality/>

with in their evaluations noted they found this kind of gender mainstreaming challenging, especially under EFSD+ guarantees and in grants.⁴⁸

■ Outlook

The next policy cycle presents an important opportunity for the EU to strengthen the implementation of its WPS commitments across external action. GAP III has contributed to an expansion of gender-mainstreamed action and strengthened support and engagement with women's civil society organisations. At the same time, the implementation experience shows that progress remains uneven, particularly on the quality of gender mainstreaming, the four WPS pillars, meaningful participation of women's organisations in political and policy dialogue, and the availability of flexible and sustainable funding.

GAP IV, the next WPS Action Plan and the 2028–2034 MFF should therefore be developed and implemented as mutually reinforcing frameworks. Clear targets, meaningful indicators, adequate resources and transparent reporting will be essential to ensure that existing commitments translate into sustained action. This is particularly important in a context of shrinking civic space, increasing conflict and pressure on resources, where women's CSOs and peacebuilders are often among those closest to affected communities and at the forefront of prevention, protection, participation, relief and recovery.

Ultimately, the next policy cycle should ensure that WPS is not treated as a standalone policy commitment or a programming objective, but as an integral part of the EU's political, diplomatic and external action. Sustained engagement with women peacebuilders, WROs and other CSOs in conflict-affected contexts will be essential to making this ambition a reality.

⁴⁸ Intermediary Evaluation, page iv

Key recommendations

1. **Increase and expand funding to diverse women-led, women-focused and feminist organisations working across the four pillars of the WPS agenda (prevention, participation, protection and relief and recovery), and design funding in an intersectional way, under GAP IV and the next MFF.**
 - In drafting the GAP IV, DG INTPA should include a target of 85% of EU external funding to G1 actions, 20% to G2 actions, and 5% specifically earmarked for WROs, to ensure continuity of ambition.
 - Earmark a minimum share of funds to cover gender equality objectives in projects marked G1.
 - The EP and the Council should support the inclusion of binding targets of 85% for G1 actions, 20% for G2 actions, and 5% specifically earmarked for WROs in their final agreement on the Global Europe instrument.
 - The Commission and Member States should ensure to commit core, long-term and flexible funding to WCSOs in conflict-affected countries which will allow them to effectively support communities and rights holders and respond quickly to changing circumstances. This should include reviewing funding procedures that structurally prevent long-term, core, flexible funding to local CSOs.
 - Provide support to and engage with diverse types of local WCSOs working on peacebuilding, conflict prevention, conflict-resolution and providing relief, support and human rights advocacy to communities during and after conflict. This should include organisations outside capital cities, organisations working directly in conflict-affected regions; organisations led by people with disabilities; organisations led by racialised people, ethnic minorities and indigenous peoples; youth-led organisations, LGBTQI-led organisations; organisations where staff does not speak English or other European languages, and organisations focused on the environmental impacts of conflict.
 - When it is not possible to fund local organisations directly due to administrative burdens of managing EU grants, shrinking civic space in partner countries, or because of lack of EU capacity to build connections with the above spectrum of NGOs, the European Commission and EU Delegations should fund local WCSOs through intermediary INGOs, foundations and women's funds that have longstanding, trusted partnerships with networks of WCSOs in conflict-affected countries.
 - Clearly and transparently monitor and report on the proportion of funding going to CSOs and WCOs in fragile and conflict-affected countries.
2. **Overhaul the proposed indicators in the Proposed Performance Regulation for the next MFF.**
 - Significantly review the indicators under the headings Conflict, Peace and Security (where gender equality is almost absent), Democracy and Rights and Humanitarian in the proposed Performance Regulation, to ensure that gender is mainstreamed into the existing proposed indicators.
 - Review the proposed indicators against the current indicators for WPS from the AP, the Strategic Approach to WPS, and the current commitments

on WPS in GAP III as well as the EU's commitments to UNSCR 1325, the UN Sustainable Development Goals and the Beijing Platform for Action. Add missing indicators on this basis.

3. Take steps to ensure that infrastructure and other spending under Global Gateway and Team Europe initiatives is conflict and gender-sensitive, follows a human-rights based framework, and does not do harm to the peace, security and human rights of women, girls and minorities living in partner countries.

- Prioritise the Sustainable Development Goals, UN Charter on Human Rights, Beijing Platform for Action, and UNSCR 1325 as key frameworks by which to create success indicators and thereby measure success and accountability of Global Gateway and Team Europe projects. Assess to what degree the investments are contributing to the EU's commitments across these frameworks.
- Conduct mandatory gender-sensitive conflict analysis, gender-sensitive human rights impact assessments, and gender-sensitive climate and environmental impact assessments before or at the project proposal / identification phase of infrastructure projects and other initiatives funded by Global Gateway and Team Europe. Ensure that these have a binding effect on whether such projects can be approved.
- Revisit these assessments and their recommendations on a regular basis throughout the life cycle of projects, and incorporate relevant indicators connected to them into the monitoring of these projects, adjusting, pausing or halting projects as appropriate.
- Engage in regular dialogue with a broad spectrum of community-based organisations – including CSOs, women-led organisations, peacebuilding experts, trade unions, human rights groups, indigenous groups, religious leaders, and others – to discuss priorities and concerns regarding the impact of projects funded by Global Gateway and Team Europe initiatives – including regarding participatory planning, dispute resolution, and the governance of resources, land and water. This should be integrated from the design / project selection phase up until the evaluation phase of an EU investment.
- Incorporate assessments of land use, and forced and pressurised displacement into decision-making regarding large-scale infrastructure and other projects funded by Global Gateway. This should include assessments of informal land use and ownership, customary law, cultural heritage, common land, indigenous people's rights, nomadic people's rights, land held under collective and communal titles, rights of way for grazing, and land of religious significance, and how these relate to gender, peace and security.
- Ensure that there are clear, transparent and accessible feedback and complaint mechanisms for people in communities affected by infrastructure projects funded by Global Gateway, ensuring accountability of the EU, and private sector partners at all levels of the supply chain regarding peace and security, including gendered peace and security impacts of projects, gendered human rights impacts, labour rights, land rights, and environmental degradation. Review the safety of existing complaint mechanisms for complainants and adapt or create new mechanisms as appropriate.

4. Ensure political and policy dialogue with women peacebuilders, mediators, conflict prevention and human rights experts and CSOs in conflict-affected

countries to set funding priorities in the implementation of Global Europe, political priorities in partner countries, and ensure oversight of the EU as a funder and political actor in conflict-affected contexts

- Ensure that staff at both EU Delegation and HQ level engage in regular dialogues with these groups, and that engaging in dialogues with women experts and CSOs is resources, and that the safety of participants is protected.
- Involve a diverse range of CSOs – including those focused on WPS - in developing Gender Country Profiles and CLIPs and MIPs – and ensure that these cover peace and security issues from a rights-based, gendered perspective.
- Ensure that EU Ambassadors and the Heads of Political sections take full ownership of GAP III and WPS commitments and proactively engage in discussion with WROs, feminist movements and women experts on peace and security, rule of law and human rights issues, and economic issues.
- Include WPS in the job descriptions of senior staff of the political sections of each Delegation.

Annex I: List of abbreviations

AFET	European Parliament's Committee on Foreign Affairs
BUDG	European Parliament's Committee on Budgets
CLIP	Country Level Implementation Plan (of the EU's Gender Action Plan)
CSDN	Civil Society Dialogue Network
CSDP	Common Security and Defence Policy
CSFP	Common Foreign and Security Policy
CSO	Civil Society Organisation
DEVE	European Parliament's Committee on Development
DG	Directorate General
DG ECHO	DG for European Civil Protection and Humanitarian Aid Operations
DG ENEST	DG for Enlargement and Eastern Neighbourhood
DG INTPA	DG for International Partnerships
DG MENA	DG for the Middle East, North Africa and the Gulf
EBRD	European Bank for Reconstruction and Development
EC	European Commission
EIB	European Investment Bank
EEAS	European External Action Service
EP	European Parliament
EPLO	European Peacebuilding Liaison Office
ESFD+	European Fund for Sustainable Development+
EU	European Union
EUD	EU Delegation
FEMM	EP's Committee on Women's Rights and Gender Equality
GAP III	EU Gender Action Plan III
GAP IV	EU Gender Action Plan IV
GFP	Gender Focal Point
INGO	International Non-Governmental Organisation
FPI	Service for Foreign Policy Instruments
LGBTQI+	Lesbian, Gay, Bisexual, Transgender, Queer, Intersex + other identities
MIP	Multiannual Indicative Programme
MFF	Multiannual Financial Framework
NDICI	Neighbourhood, Development and International Cooperation Instrument
ODA	Overseas Development Aid
OECD	Organisation of Economic Cooperation and Development
OECD-DAC	OECD-Development Assistance Committee
ODI	Overseas Development Institute
SGBV	Sexual and Gender Based Violence
SRHR	Sexual and Reproductive Health and Rights
VAWG	Violence Against Women and Girls
WCSO	Women's CSO
WEE	Women's Economic Empowerment
WRO	Women's Rights Organisation
WPS	Women, Peace and Security
UN	United Nations
UNSCR	UN Security Council Resolution