

Research Report

From GAP III to GAP IV



ODI Europe

Rethinking the EU's global support for gender equality

Aline Burni and Aatif Somji

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Acronyms

AAP	Annual Action Programme
AD	Action Document
CLIP	Country-Level Implementation Plan
CSO	Civil Society Organisation
DAC	Development Assistance Committee (OECD)
DEI	Diversity, Equity and Inclusion
DG INTPA	Directorate-General for International Partnerships
EC	European Commission
EEAS	European External Action Service
EIB	European Investment Bank
EU	European Union
EUDs	EU Delegations
EP	European Parliament
EPP	European People's Party
FFP	Feminist Foreign Policy
GAP	Gender Action Plan
GCP	Gender Country Profile
GDP	Gross domestic product
GEWE	Gender Equality and Women's Empowerment
GFP	Gender Focal Point
HR/VP	High Representative of the Union for Foreign Affairs and Security Policy & Vice-President of the European Commission
HoC	Head of Cooperation
HoD	Head of Delegation
LGBTIQ	Lesbian, Gay, Bi, Trans, Intersex, Queer
MFF	Multiannual Financial Framework
MIP	Multiannual Indicative Programme
NDICI-GE	Neighbourhood, Development and International Cooperation Instrument – Global Europe
ODA	Official Development Assistance
OECD	Organisation for Economic Co-operation and Development

S&D	Socialists & Democrats group
SRHR	Sexual and reproductive health and rights
TEI	Team Europe Initiative
WEE	Women's Economic Empowerment
WPS	Women, Peace and Security

Executive summary

The European Union (EU) is a leading actor in setting global gender norms, consistently devoting more aid towards gender equality than other donors. In 2020, the EU set out its third Gender Action Plan (GAP III), an ambitious framework establishing commitments, targets and guidelines to integrate gender equality into its international partnerships and global action. A successor (or updated) document is expected to be developed in 2026.

GAP III was established in a relatively conducive policy environment. However, the current political context presents significant challenges. The EU's priorities have been drastically reshaped by a combination of political shifts, successive crises, global instability and a strong focus on economic competitiveness, security and defence. At the same time, a global backlash against democracy, human rights and gender equality has made the promotion of gender equality increasingly politically contested. The US' retreat from international commitments and the dismantling of diversity, equity and inclusion policies domestically and internationally have aggravated the situation and put additional political pressure on the EU.

Against this backdrop, this report assesses the implementation of GAP III and offers recommendations for a new (or updated) framework. It explores ways to strengthen global support for gender equality in light of the EU's evolving priorities and the rising political contestation of gender equality policies. It also considers how support for gender equality could respond to the EU's new frameworks and priorities – such as the Global Gateway and Team

Europe – without abandoning commitments to fundamental rights and more traditional areas of EU support.

The research was based on document analysis and 31 semi-structured interviews with key informants from EU delegations and institutions, civil society organisations, think tanks and other experts.

The consultation highlighted that GAP III is a valuable framework for promoting gender equality. Its language is regarded as progressive and ambitious, with interviewees emphasising its gender-transformative, intersectional and human rights-based approach. EU delegations view GAP III as a practical and concrete source of guidance. The integration of gender targets and Country Level Implementation Plans into the programming process has incentivised the mainstreaming of gender-sensitive approaches in external action, particularly in development cooperation.

The report also identified persistent implementation challenges across five key areas:

1. In practice GAP III has not been fully integrated in all areas of EU external action, and remains largely confined to the development sector. There are mixed views on the extent to which gender-sensitive approaches have been embedded in Global Gateway and Team Europe.
2. There is a persistent shortage of adequate human resources and capacity, and significant variability in expertise and commitment to gender equality within and across EU delegations and at headquarters. Leadership commitment is a key factor for successful implementation.

3. Issues emerged with regard to financial resources, notably the absence of a mechanism to accurately track gender equality expenditure. Despite being recognised as impactful actors driving local change, very limited funding is allocated to women's rights organisations (WROs).
4. Political will, both in the EU and in partner countries, remains crucial. A perception that gender equality is a low priority in Brussels sends a signal of disengagement. In some partner countries, anti-gender actors or authoritarian-leaning governments have created increasingly challenging environments for EU and international cooperation.
5. Accountability gaps persist, particularly in relation to the meaningful engagement of civil society actors, as well as in monitoring results and impact.

Despite the challenges, and the very real risk that EU policy-makers will discontinue this agenda, we found strong demand for retaining a document similar to GAP III.

We offer five policy recommendations to help keep gender equality on the policy agenda and strengthen the EU's global support in this field:

1. Demonstrate the added value of gender equality

- Build a compelling political case for gender equality.
- Show the tangible benefits of gender-sensitive approaches in Europe and globally.
- Frame gender equality and inclusion in a way that engages diverse audiences and broader alliances.
- Link gender equality with the EU's emerging priorities and strategic objectives.

- Highlight the EU's distinctive leadership and added value, which set it apart from other global players.

2. Align emerging EU approaches with gender equality priorities across external action

- Ensure the next (or updated) GAP responds to the EU's new international partnership frameworks and priorities.
- Establish clear guidelines and requirements to integrate gender equality into Global Gateway and Team Europe.
- Make the GAP a shared responsibility across all Commission services with external-facing policies, beyond DG INTPA and EEAS.

3. Maintain gender targets in external financing and strengthen accountability

- Keep or raise gender targets in the next Global Europe financial instrument.
- Define targets as a percentage of funding – not a percentage of actions – to ensure transparency and traceability.
- Reach the 5% target for gender-principal investments.
- Complement OECD Gender Marker reporting with EU-specific monitoring mechanisms tracing disbursements.
- Earmark a minimum share of funds to cover gender equality objectives in projects marked G1 (gender as a significant objective).

4. Leverage partnerships with Women's Funds to support WROs

- Work with Women's Funds to reduce risks and complexity in supporting WROs.
- Recognise the untapped potential of WROs in addressing shrinking civic space and democratic backsliding.
- Expand cooperation with WROs to strengthen the EU's partnerships and resilience in challenging contexts.

5. Strengthen implementation capacity

- Allocate sufficient human resources and training on gender-sensitive approaches, particularly for leadership.
- Prioritise skills development in emerging areas of EU external action, including infrastructure, energy, transport, digitalisation and private sector engagement.
- Learn from the experience of actors like the European Investment Bank and the World Bank, who have developed guidelines around gender-sensitive approaches in areas including public–private partnerships, public transport and investment decisions.
- Give Gender Focal Points a clearer mandate and the capacity to fulfil their tasks.

1 Introduction

Gender equality was a clear priority for the first von der Leyen Commission (2019–2024). Among key gender initiatives, the European Union (EU) launched its third Gender Action Plan (GAP III) in November 2020, covering the period 2020–2025 and later extended to 2027 (European Commission, 2023b). GAP III remains the EU’s main framework for supporting gender equality globally, an area in which the EU has historically been a leading actor. The European Commission is expected to start developing a new (or updated) framework in early 2026.

GAP III faced resistance from the start. As a Joint Communication by the European Commission and the High Representative/Vice President (HR/VP) to the European Parliament and the European Council, it is a non-legislative file outlining the EU’s direction and planned actions in this area. Opposition from Hungary, Poland and Bulgaria in the Council meant there were no Council conclusions on GAP III and the Presidency of the Council at the time, Germany, only issued presidency conclusions (Council of the European Union, 2020).

The gender equality agenda is facing even stronger opposition now, and could be completely sidelined by EU stakeholders. Three main factors challenge the EU’s support for gender equality. First, the EU’s priorities have been reshaped by a combination of a political shift to the right, successive crises and global instability and a reorientation of strategic objectives towards economic competitiveness, security and defence. Additional external political pressure comes from the US, where Donald Trump has signed executive orders impacting gender equality policies, domestically

and abroad. Second, substantial cuts to foreign aid budgets have particularly affected funds dedicated to gender equality. Third, anti-gender movements have gained funding and influence, both in Europe and globally.

Against this backdrop, this report provides an independent assessment of the implementation of GAP III and offers recommendations for a new framework (potentially GAP IV) or an update. In particular, it explores ways to strengthen global support for gender equality in light of the EU’s evolving priorities and the growing political contestation of gender equality policies worldwide. It also considers how EU support could be more closely aligned with new frameworks and approaches – such as the Global Gateway, Team Europe and the Global Europe instrument – without abandoning commitments to fundamental rights, including tackling gender-based violence (GBV) and protecting sexual and reproductive health and rights (SRHR).

This report is intended for EU policy-makers and the wider foreign affairs community, particularly those working on gender equality and human rights. It draws on analysis of key EU documents, academic literature and work by civil society organisations (CSOs) and think tanks. The desk research was complemented by 31 semi-structured interviews with key informants from EU delegations (EUDs), EU institutions, CSOs, think tanks and other experts. The interviews were conducted between February and May 2025, mostly remotely, using a guide questionnaire tailored to each respondent’s area of expertise and context. All interviews were carried out based on anonymity, and interviewees’ views are cited extensively

throughout this report. The majority of interviews were carried out with EU delegations (mostly Gender Focal Points) across diverse regions, including Latin America, Africa, Central

and Eastern Europe, and Asia (see Figure 1). The consultation was mainly with EU representatives abroad rather than local or national partners, and this is a limitation of the study.

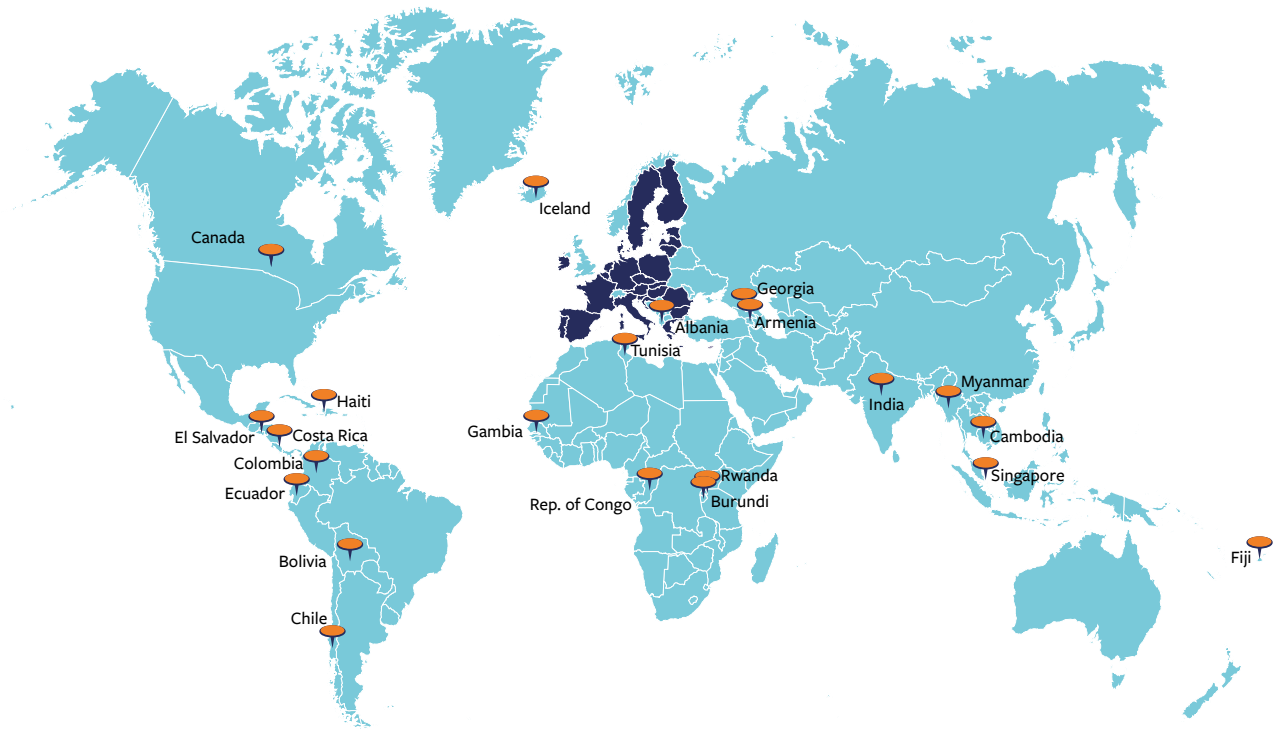


Figure 1 Geographical diversity of consulted EU delegations

Source: Authors

The next section outlines the challenges facing the gender equality agenda. Section 3 summarises the EU’s framework for supporting gender equality globally, revisiting the commitments established under GAP III. Section 4 focuses on the implementation and impact of GAP III, identifying

gaps and challenges and highlighting good practice and lessons learned. In Section 5 we present concluding remarks and offer recommendations for EU policy-makers and the wider foreign affairs community, particularly those working on gender equality and human rights.

2 Context

2.1 Changing priorities from von der Leyen I to II

When Ursula von der Leyen took office in 2019 as the first woman President of the European Commission (EC), gender equality was set out as a priority. Her 2019–2024 Political Guidelines highlighted gender equality and advanced ambitious commitments in this field (Bassot, 2020; Batura, 2024).

In her first term, von der Leyen appointed a gender-balanced College of Commissioners and created a dedicated post for a Commissioner for Equality. While gender inequalities remain a persistent challenge across the EU (EIGE, 2024), the Commission nonetheless delivered significant milestones. These include the Directive on Combating Violence Against Women and Domestic Violence, the EU's accession to the Istanbul Convention and the adoption of the Pay Transparency and Women on Boards Directives (Batura, 2024). The Commission's Gender Equality Strategy 2020–2025 was particularly welcomed by feminist civil society actors (EWL, 2020; IPPF EN, Centre for Reproductive Rights and End FGM European Network, 2020).

The third Gender Action Plan (GAP III) was introduced in November 2020, in the difficult context of the Covid-19 pandemic (UN Women, 2020; EIGE, 2022). The commitments established in GAP III are outlined in Section 3. Since then, the political environment has significantly changed. With Russia's full-scale invasion of Ukraine in 2022, the EU has increasingly prioritised security and defence, with corresponding expansion in political attention and investment. Meanwhile, European elections in 2024 saw progressives lose ground to

conservative and far-right parties (Burni, 2024a). Additional external political pressure has come from the US, where executive orders signed by Donald Trump have dismantled Diversity, Equity and Inclusion (DEI) programmes and policies, domestically and internationally. Against this background, the second von der Leyen Commission (2024–2029) has adopted a notably different approach to gender equality. There is no longer a standalone Commissioner for Equality, with this portfolio merged with Preparedness and Crisis Management.

Gender equality is not incompatible with economic, security and stability objectives. In fact, gender-sensitive approaches can and should be integrated into those agendas. The European Investment Bank (EIB) reports that taking action to advance gender equality could add \$13 trillion to global gross domestic product (GDP) by 2030 (EIB, 2024). In the EU, improving gender equality would lead to a 6.1–9.6% increase in EU GDP per capita, or €1.95–€3.15 trillion, and an additional 10.5 million jobs by 2050 (Ibid.). As one interviewee put it:

The reason the EU promotes gender equality is because of values and economic competitiveness – we should emphasise the 'and'; they are not exclusive. (Interview 13)

Yet, among many EU policy-makers, there remains a widespread perception that gender equality and broader societal dimensions, including human rights, are being sidelined at the expense of new priorities and a more 'strategic' approach to international partnerships. ODI Europe's recent extensive stakeholder consultation looking at the future of development aid and the EU's new

strategic agenda found significant concerns to that effect (Kumar et al., 2025). One interviewee for this study underlined the difficulties in keeping gender equality on the agenda:

A critical priority is to maintain gender equality as a topic on the agenda at all. At the moment, I don't think it's about whether the priority is women's economic leadership, gender-based violence, Women, Peace and Security, or something else. It's about simply keeping gender equality on the agenda, as part of a multilateral-based order, because it is being constantly questioned, scrutinised, and attacked.

(Interview 28)

2.2 Three key challenges for the EU

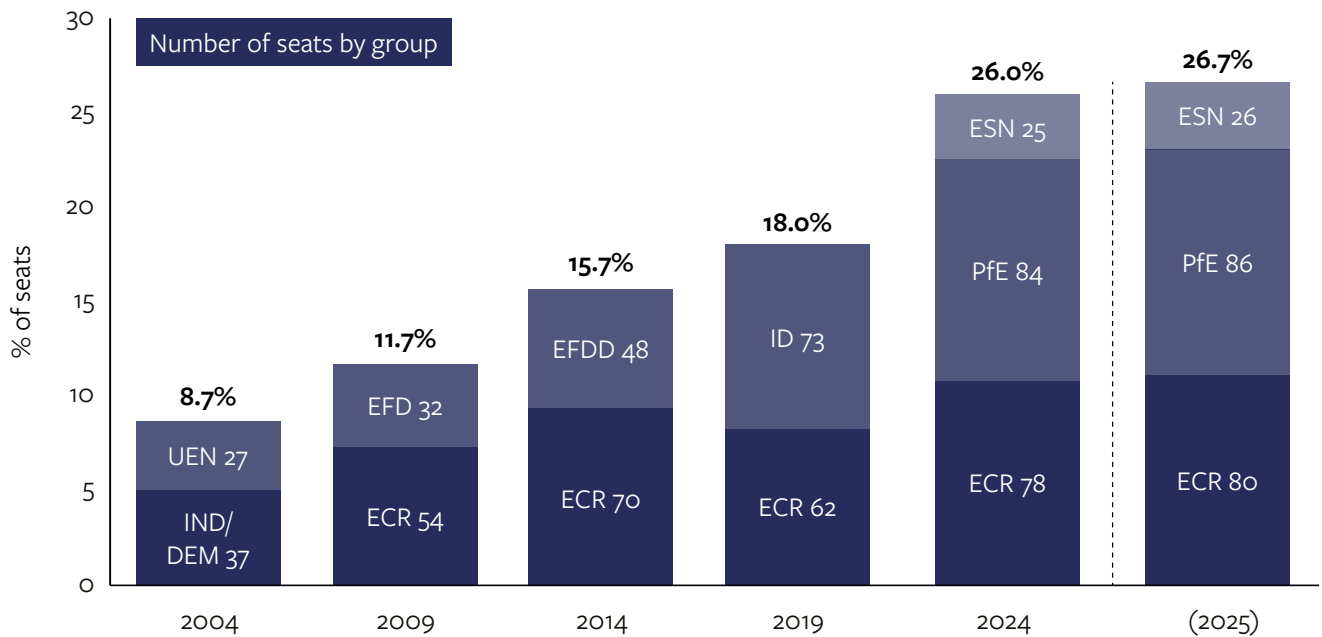
In Europe specifically, but also to some extent globally, we identify three major challenges to the promotion of gender equality: the changing political landscape; changing funding patterns; and the growing prominence of anti-gender actors.

The changing political landscape

The first challenge is the changing political landscape in European member states and EU institutions, where there has been a distinct shift to the right (Aktas, 2024). The political balance in the European Council – composed of national leaders of the 27 EU member states – clearly leans to the right. Between 2019 and 2025, far right and right-wing members increased from two to four affiliated with far-right groups and from eight to 11 with the centre-right European People's Parties (EPP) (Europe Elects, 2025). The centre-left bloc lost members, going from seven to four affiliated with the liberal group ALDE/Renew, and from eight to four affiliated with the Socialists & Democrats (S&D) group (ibid.).

In the last two decades, the share of far-right parties in the European Parliament has significantly increased, from 8.7% in 2004 to 26.7% in 2025 (see Figure 2). Although they are not united in a single political group, far-right parties share a similar agenda and have actively opposed gender equality and women's and LGBTQI+ rights (Kantola and Lombardo, 2021). They have increasingly framed 'gender' as a threat to national identity, the family or traditional values (Kuhar and Paternotte, 2017; Zervoulakou, Kesberg and Mügge, 2025). Additionally, for the first time the 2024 European elections resulted in a decrease in the share of women Members of the European Parliament (MEPs), reversing a historic trend (Burni, 2024b). While parties on the centre right vary in their support for gender equality policies, with some holding more progressive positions on topics such as LGBTQI+ rights (Beloshitzkaya, Lefkofridi and Ceron, 2025), political and electoral pressure from the far-right is prompting some to distance themselves from support for gender equality policies and sometimes to adopt anti-gender rhetoric themselves.

Figure 2 The far-right in the European Parliament, 2004–2025



Source: Authors’ own compilation from European Parliament (2025)

Note: 2004–2024: Number of seats by constitutive session; 2025: up-to-date figures. UEN: Union for Europe of the Nations; IND/DEM: Independence/Democracy; EFD: Europe of Freedom and Democracy; ECR: European Conservatives and Reformists; EFDD: Europe of Freedom and Direct Democracy; ID: Identity and Democracy; ESN: Europe of Sovereign Nations; PfE: Patriots for Europe.

Foreign aid cuts

The second challenge is linked to cuts in foreign aid budgets, and especially in funding targeting gender equality. In 2024, official development assistance (ODA) from major donor countries fell by 7% compared to 2023, marking the first decline after five consecutive years of growth and the largest single-year decrease since at least 2017. In 2025, major European donors scaled back their foreign aid commitments (see Figure 3), announcing reductions to ODA totalling

€30 billion over the next four years (Countdown 2030; 2025). The OECD projects that ODA is set to decline by 9–17% in 2025 (OECD, 2025).

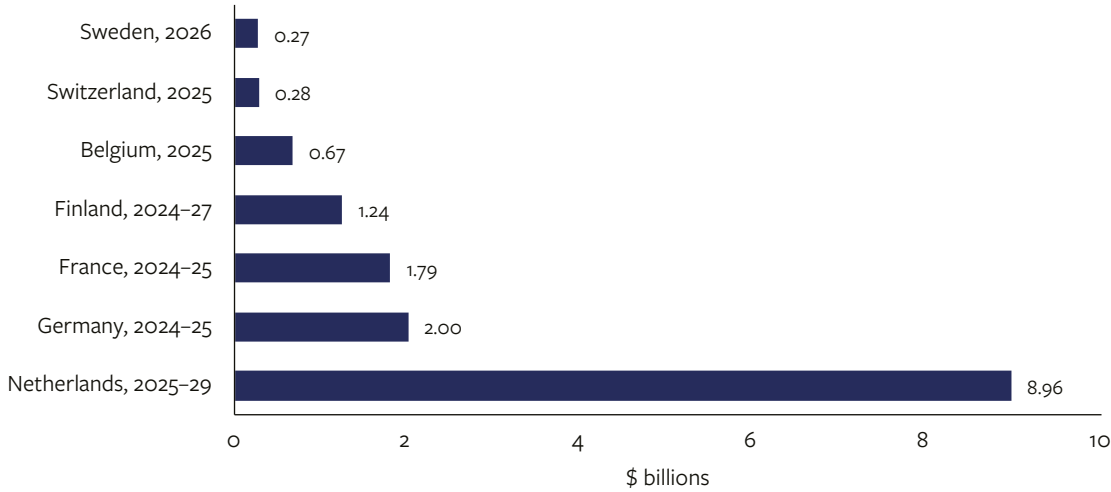
Aid cuts have been particularly pronounced in the area of gender equality (Harper et al., 2025). Among DAC members, the share of ODA with gender equality objectives fell from 45% in 2019–2020 to 42% in 2021–2022 (see Figure 4). Preliminary data for 2023¹ suggests a further drop, to 37%. Twenty of the 32 members of the OECD-DAC reduced their focus on gender equality in 2021–2022 compared to 2019–2020 (OECD, 2024). Just 4% of ODA (\$5.5 billion) targeted gender

¹ SEEK development Donor Tracker webinar, April 2024.

equality as a principal objective,² and 38% (\$54.9 billion) integrated gender equality as a significant objective, or as one policy objective among others (ibid.). This trend is likely to continue. The Alliance

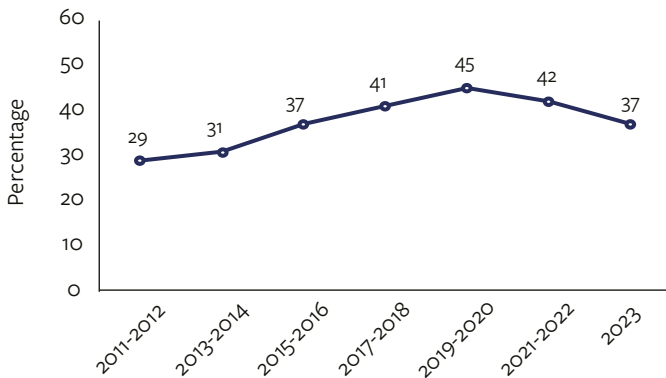
for Feminist Movements estimates that, starting in 2026, the women’s rights and gender equality sector will face annual losses of \$2.83 billion (Alliance for Feminist Movements, 2025).

Figure 3 Public announcements in 2024 on bilateral aid cuts, US\$ billions



Source: Kumar et al. (2025)

Figure 4 Share of DAC members’ ODA with gender equality objectives, 2011–2022



Source: OECD, 2024

² OECD-DAC members indicate for each project/programme whether it targets gender equality as a policy objective according to a three-point scoring system. Significant (score 1) means: gender equality is an important and deliberate objective, but not the principal reason for undertaking the project/programme. Principal (score 2) means: gender equality is the main objective of the project/programme and is fundamental in its design and expected results. Not targeted (score 0) means: the project/programme has been screened against the marker but has not been found to target gender equality.

Rise of anti-gender actors

The third challenge is the rise in the EU and globally of both state and non-state anti-gender actors (Goetz and Mayer, 2025). Anti-gender actors are ‘individuals, organisations, and networks that mobilise against what they call “gender ideology” – a term used to denounce a range of policies, rights, and academic fields associated with gender equality, sexual and reproductive rights, and LGBTQI+ rights. These actors include religious institutions, conservative civil society organisations, political parties, and sometimes state representatives, who collaborate to oppose the advancement of gender and sexual rights at national and transnational levels’ (Kuhar and Paternotte, 2017).

The US government is openly taking steps not only to dismantle existing policies, but also to significantly reshape the landscape of gender equality, human rights and democracy, both within the US and globally (Datta, 2025a). Among his first actions in office, Trump signed executive orders mandating the termination of all policies, programmes and initiatives promoting ‘diversity, equity and inclusion’, which the White House characterised as ‘immense public waste and shameful discrimination’ (The White House, 2025). In Europe, anti-gender movements have become more professionalised and coordinated (Datta, 2021), and their funding has increased: funding for anti-gender movements has grown four-fold in a decade, from \$22.2 million in 2009 to \$96 million in 2018, totalling \$707.2 million over the 10-year period (Datta, 2021). In the five years between 2019 and 2023, anti-gender movements raised \$1.18 billion (Datta, 2025b).

Anti-gender actors have used mis- and dis-information to erode gender equality policies (Gehrke and Amit-Danhi, 2025), including in the field of development cooperation. For example, the Heritage Foundation, a US conservative think tank, referred to Joe Biden’s gender equality support via the USAID as ‘radical gender policy to export cultural colonialism’ and as ‘ideological colonialism’ (Melton, 2022). In Europe, one interviewee gave an example of the French development agency AFD being attacked by far-right actors for ‘*using resources only to promote woke ideology...*’ (Interview 14). This illustrates how disinformation creates significant risks for gender equality investments, when actually most of the EU’s support is dedicated to important basic, frontline services, such as addressing gender-based violence.

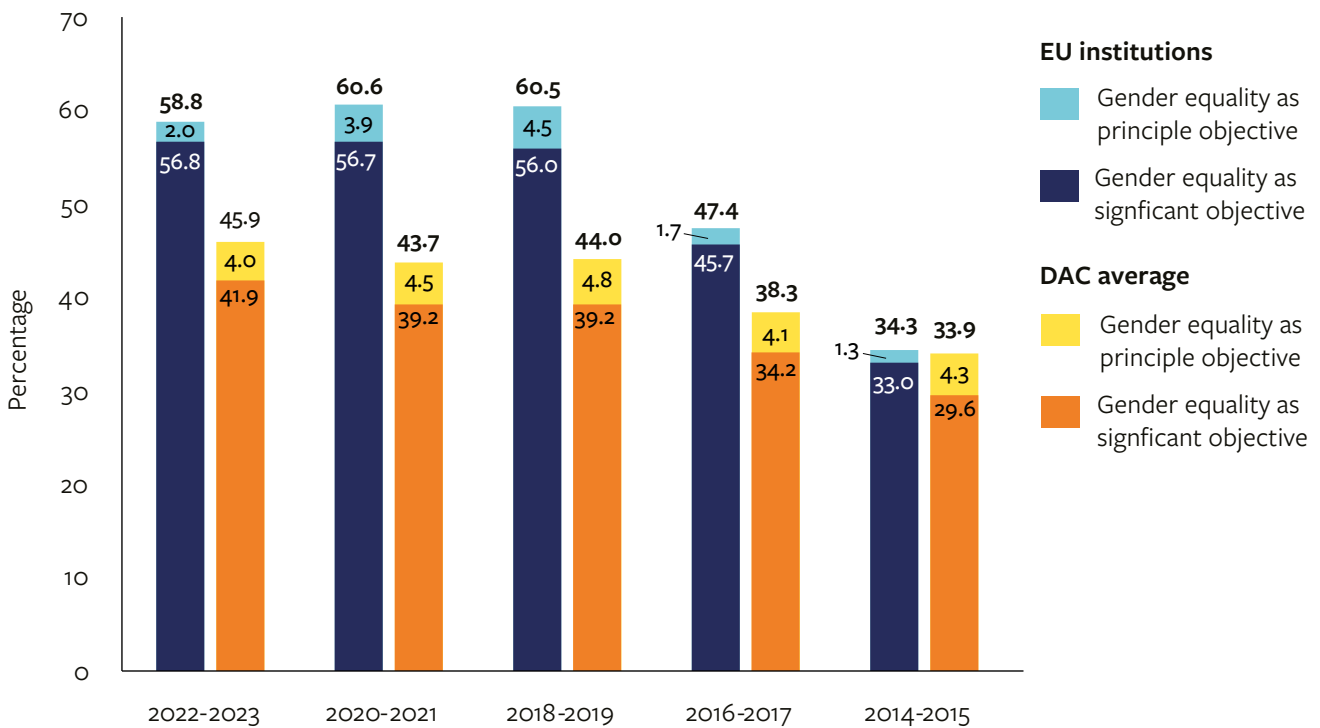
3 The EU’s global support for gender equality: the current framework

3.1 The EU as a gender equality actor

Gender equality has been a fundamental value of the EU since its foundation. While the EU has promoted gender parity and the empowerment of women within its borders for decades, it was not until the 2000s that it began to extend this commitment globally. The EU has become a leading actor in setting global gender norms and promoting gender equality. In 2021–2022, the EU

Institutions and Germany provided the largest volumes of ODA with gender equality as either a principal or significant objective, with \$12.3 billion and \$12.1 billion respectively. (Williams and Hedman, 2024). Over the last decade, the share of ODA committed by the EU institutions to gender equality objectives (both principal and significant) has been consistently above the DAC average, as shown in Figure 5.

Figure 5 Share of ODA with gender equality objectives, 2014–2023



Source: OECD, 2025

3.2 A focus on development cooperation

Gender equality was initially positioned as part of the EU's broader development cooperation. The first explicit commitment to gender equality in the EU's external relations appeared in the Cotonou Agreement, which until 2020 governed the EU's relations with 79 African, Caribbean and Pacific countries. The agreement endorsed the equal participation of women and men in all spheres of political, economic and social life, and supported the adoption of specific measures to advance women's rights.

The Cotonou Agreement was signed in June 2000. The following year, the Commission of the European Communities issued the 'Programme of Action for the Mainstreaming of Gender Equality in Community Development Cooperation (2001–2006)'. This document highlighted the importance of gender mainstreaming in development cooperation and emphasised the need to improve women's conditions and livelihoods to address poverty. A subsequent Communication released in 2007, 'Gender Equality and Women's Empowerment in Development Cooperation', recognised the Commission and the EU Member States as key players in the effort to close gender gaps in the 'developing world'. These frameworks promoted gender equality through mainstreaming, with a particular thematic focus on women's economic empowerment and the prevention of gender-based violence.

The first Gender Action Plan (GAP I), covering the period 2010–2015, established what is known as the 'three-pronged approach', whereby the EU would advance gender equality through mainstreaming, targeted actions and political dialogue with partner countries. GAP II (2015–2020) included as a crosscutting priority a shift in the institutional

culture of the EEAS and encouraged the EU and its member states to increase the proportion of ODA directed towards programmes with a gender component (Allwood, 2018).

3.3 Broadening the scope to all EU external action

Up to this point, the EU's support for gender equality had been largely confined to the development sector. GAP III (2020–2025) broadened this commitment to encompass all areas of EU external action, including trade, climate policy and peace, security and defence. However, although GAP III theoretically applies to all areas of the EU's external action, in practice support for gender equality is still predominantly focused on development cooperation, and concentrated within DG INTPA. The thematic focus has remained gender-based violence and women's economic empowerment.

GAP III was issued as a joint communication by the EC and the High Representative of the Union for Foreign Affairs and Security Policy (HR/VP). In July 2021, an EU Ambassador for Gender and Diversity was appointed, demonstrating the increased attention to gender equality and steps to strengthen institutional capacity. However, despite engagement on several fronts, including through the introduction of the concept of gender-responsive leadership in senior EEAS management meetings, the office has not had the capacity to deliver on the extensive mandate it has been given (Di Ciommo et al., 2023). The role does not have a dedicated budget and staffing is limited, with most personnel seconded by EU member states (ibid.).

One interviewee (Interview 28) noted that, although GAP III is a responsibility of both the EEAS and DG INTPA, *'there seems to be some misunderstanding across the EU institutions*

and across teams that the EEAS is only in charge of implementing the WPS part of GAP. But this certainly is not true. The EEAS is responsible for the GAP III – full stop. Just like other colleagues in INTPA are responsible for this.’

3.4 GAP III commitments

GAP III commits to action across five key pillars, complemented by a set of objectives and indicators to guide implementation (European Commission, 2020b; 2020c):

1) Making EU engagement for gender equality more effective

This elevates gender equality to a cross-cutting priority across all EU external action, incorporating three core principles for tackling the root causes of gender inequality: a gender-transformative, rights-based and intersectional approach. Gender mainstreaming is encouraged through gender analyses and gender-responsive and sex-disaggregated data. Any actions not contributing to gender equality require justification.

GAP III references the EU’s commitment that at least 85% of all new external actions will contribute to gender equality by 2025, either as a significant or a principal objective (G1 or G2, respectively), according to the OECD-DAC gender equality scoring system. In addition, at least one action per country and region should have gender equality as a principal objective (G2).

2) Promoting strategic engagement

This pillar encourages a coordinated, strategic and coherent approach to EU engagement at country, regional and multilateral levels. At the country level, this is achieved through a Country-Level Implementation Plan, or CLIP, prepared by EU delegations. It also requires partnership between the EU and national ministries, local authorities

and civil society organisations, including women’s rights organisations, human rights defenders, young people and faith-based organisations.

At the regional level, EU engagement, dialogue and partnership is encouraged with regional stakeholders, while multi-country gender analyses are proposed to mainstream the regional gender perspective. At the multilateral level, the EU is expected to use its authority and convening power to support its leadership role on gender equality: advancing resolutions and declarations in favour of gender equality, and consistently promoting the inclusion of gender-responsive language in resolutions and declarations.

3) Towards a gender-equal world: focusing on key thematic areas of engagement

This pillar aims to accelerate progress towards gender equality and women’s empowerment by focusing action on six key thematic areas, each with its own objectives and indicators:

- Ensuring freedom from all forms of gender-based violence.
- Promoting sexual and reproductive health and rights (SRHR).
- Strengthening economic and social rights and empowering girls and women.
- Advancing equal participation and leadership.
- Integrating the women, peace and security agenda in the EU’s actions on all matters related to peace and security.
- Addressing the challenges and harnessing the opportunities offered by the green transition and the digital transformation.

4) The EU leads by example

GAP III also includes a commitment to enhancing the EU’s own institutional capacity in promoting gender equality and taking on greater leadership in this area. EU leadership – including heads of

delegations – must demonstrate that they are promoting gender equality, and all relevant EU services should report against this as part of the annual reporting process. In terms of capacity, all management-level staff are expected to receive mandatory training on gender equality and implementing GAP III, while broader upskilling on gender knowledge and expertise should take place for all staff. Finally, there is a commitment to gender parity in management positions, as per von der Leyen’s 2019–2024 Political Guidelines. Success indicators include all EU delegations having gender advisors and/or Gender Focal Points; 100% of management trained on gender equality and GAP III; and 50% women in middle and senior management positions in EU delegations and HQ EEAS.

5) Reporting on and communicating results

The EU commits to monitor progress each year on the implementation of GAP III and to publish quantitative and qualitative results at the mid-term and end-point of GAP III implementation. Thematic indicators accompanying the GAP are designed to be integrated into CLIPs.

3.5 Relevant frameworks connected to GAP III

While GAP III guides the EU’s approach to gender equality for external action, it sits within a wider set of frameworks that encompass various aspects of gender equality and women’s empowerment, including inside the EU. These include:

- **The EU Gender Equality Strategy (2020–2025)**, which sets out key policy objectives and actions for the European Commission’s work towards gender equality within Europe. It focuses on three main areas: violence, economy and leadership (European Commission, 2020a).

An updated strategy for 2026–2030 underwent public consultation between May and August 2025 and is set for adoption by the Commission in the first quarter of 2026 (European Commission, 2025b).

- **The LGBTIQ Equality Strategy (2020–2025)**, which outlines a series of targeted actions to enhance equality for LGBTIQ people within and outside the EU – including tackling discrimination and enhancing safety and inclusion (European Commission, 2020d). An updated strategy for 2026–2030 underwent public consultation between April and June 2025 and is set for adoption by the Commission in the fourth quarter of 2025 (European Commission, 2025a).
- **A Roadmap for Women’s Rights (2025)**, which reaffirms key principles on women’s rights to guide future strategies and action, most notably the upcoming EU Gender Equality Strategy 2026–2030.

Several large-scale EU initiatives for external action refer to or build on GAP III commitments:

- **NDICI-GE (2021–2027)**. The Neighbourhood, Development and International Cooperation Instrument – Global Europe is the EU’s main external financing instrument, with an estimated budget of almost €80 billion over the seven-year period. It is based on three pillars: geographic programmes, thematic programmes and rapid response actions (European Commission, 2021; 2024b). At least 85% of new actions implemented under the Instrument should have gender equality as a principal or a significant objective, and at least 5% of those actions should have gender equality as a principal objective.

- The **Instrument for Pre-accession Assistance (IPA)** provides financial and technical assistance to support reforms in the enlargement region. IPA III (2021–2027) is intended to support beneficiary countries in adopting and implementing the political, institutional, legal, administrative, social and economic reforms required to comply with EU values and progressively align to the rules, standards, policies and practices of the EU (European Commission, 2025c). Funds operating under the IPA are guided by the principles of gender equality and promote women’s rights in line with the EU’s Gender Action Plans (European Parliament and Council of the European Union, 2021).
- The **Global Gateway (2021–2027)** aims to mobilise up to €300 billion of investment in digital, energy, transport, health, education and research sectors around the world (European Commission, 2023a; Tagliapietra, 2024). The main funding source is the NDICI-GE, but it relies on significant mobilisation of private investment of up to €135 billion (Eurodad, 2024; Tagliapietra, 2024).
- **Team Europe Initiatives (TEIs)** refer to joint external action by various European actors including the EU, its member states, their implementing agencies and public development banks, financial institutions like the European Investment Bank (EIB) and the European Bank for Reconstruction and Development (EBRD) and the European private sector (Karaki et al., 2022; European Commission, 2025d).

- **Global Europe (2028–2034)** is the successor to the NDICI-GE. Its proposed budget is over €200 billion, though this is expected to decrease during negotiations with the European Council and the European Parliament. Unlike the NDICI-GE, there is no gender target in the proposal.

An external, independent mid-term evaluation of GAP III (MacKellar et al., 2023) was conducted in May 2023, and the Commission published an internal mid-term report in November 2023 (European Commission, 2023b). Following the extension of GAP III to 2027, the EU decided to carry out a second evaluation process. This second evaluation is expected to be released by the end of 2025.

3.6 GAP III policy design: improvements and caveats

Previous assessments (Teevan et al., 2021; Di Ciommo et al., 2023; MacKellar et al., 2023; Sergejeff and Ciommo, 2023) and our consultations have highlighted significant improvements in the design of GAP III compared to previous GAPs.

First, the language of GAP III is described as progressive and ambitious, and interviewees highlighted that it adopts a gender-transformative and intersectional approach (Debusscher and Manners, 2020), aiming to address the structural causes of gender inequalities and gender-based discrimination. GAP III also highlights the importance of engaging men and boys in challenging gender norms and stereotypes.

Second, in terms of scope and thematic focus, GAP III articulates ambitious commitments across all areas of the EU’s external action. This has been welcomed by both the European Parliament (European Parliament, 2022) and civil society

actors (CONCORD, 2020; End FGM European Network, 2020; EuroMed Rights, 2020; Ball, 2023). Some interviewees highlighted as particularly important the inclusion of a separate focus on SRHR and WPS (Interviews 1 and 28).

Third, there is an explicit link between GAP III and programming (Teevan et al., 2021). The integration of CLIPs into the programming process has provided an additional incentive to mainstream gender approaches in EU delegations' activities, including securing some funding.

Fourth, consulted EU delegations identified GAP III as a source of guidance, providing a clear reference framework and a flexible and practical document that can be adapted to different contexts. Many EU delegations noted that they prioritised specific thematic areas among the six focus areas set out in GAP III.

What I liked about GAP III in terms of implementation is that it is very concrete-driven. I think that gives a lot of flexibility of instruments and tools to be tailored to our specific context. (Interview 10)

Even delegations in partner countries that are not recipients of ODA demonstrated awareness of GAP III and reported having applied aspects of it in their work – for example, the requirement to coordinate with other gender equality champions in multilateral for a (Interviews 13 and 15).

Finally, GAP III plays an important role in the relationship between EU institutions, serving as an additional accountability tool. MEPs, for instance, can refer to it to hold the EC to account.

For MEPs, having the GAP means they can [ask the Commission] to report on it, ask for questions, prepare self-initiative reports. It's a strong tool of accountability. (Interview 31)

Despite these positive aspects, GAP III is not legally binding and lacks both a financial and an enforcement mechanism. This limits its implementation, as we explore in Section 4. In addition, EU delegations have considerable discretion in how they apply GAP III (Di Ciommo, 2021).

A lot is left to EU delegations to implement, both at the level of the design of the intervention they want to take forward, and also the execution of that policy ... giving that margin of manoeuvre to EU delegations is on the one hand understandable, because contexts are different, but it also leaves a lot of room for inaction. (Interview 7)

The next section provides more detailed stakeholder feedback and evidence regarding the impact of the implementation of GAP III in practice. It also highlights good practices and lessons learned.

4 Key findings: GAP III implementation and impact

Based on the document analysis and key informant interviews, we identified five key areas in relation to the implementation and impact of GAP III: the integration of gender equality into European external action; human resources; financial resources; political buy-in; and accountability.

4.1 Integration of gender equality into European external action

There is a degree of internal coherence and consistency between GAP III and other European frameworks and strategies that, in theory, should translate into the mainstreaming of gender across EU external action. However, there are also factors that risk undermining commitment to gender equality across the EU's external action.

NDICI-GE

The most significant step towards the integration of gender equality in European external action has been the inclusion of gender language and targets in the EU's main external action financing instrument, the NDICI-GE. As we have seen, the NDICI-GE sets two key targets related to gender equality: that 'at least 85%' of actions implemented under the Instrument should have gender equality as a 'principal or a significant objective', of which 5% should have gender equality as a 'principal objective'. Although the 85% target was already stated in GAP II, it was only embedded in a financing instrument under the NDICI-GE (MacKellar et al., 2023). The 5% target in the NDICI-GE goes further by specifying a minimum percentage of actions with gender equality as a principal objective.

The inclusion of gender targets within the NDICI-GE has been unequivocally positive in encouraging greater mainstreaming of gender through EU external action, and for holding EU actors accountable.

For me one of the elements of GAP III has been its ability to ensure not only standalone gender equality projects, but also that gender equality is mainstreamed in all we do. As head of cooperation, I've asked everybody to ensure that not 85% but 100% of the projects we fund look at how they are going to affect men and women. (Interview 22)

The GAP is the main tool in mainstreaming gender in the EU accession processes, because it refers both to the financial support of IPA programming but also to political dialogue, at least it should guide the political dialogue in the EU accession processes ... In terms of the funding, there is a huge commitment that 85% of the IPA external funding will be marked with gender marker 1 or 2 ... which is very high. There is a reason why it's called an ambitious plan. (Interview 3)

The inclusion of targets in the financial instrument in line with GAP has been welcomed by CSOs and EU delegations. However, interviewees stressed that the targets would be more meaningful if expressed as a percentage of funding, rather than solely as a percentage of actions. This distinction is important, as the current approach risks creating ambiguity regarding which initiatives should be

counted towards the targets (e.g. only those involving budget allocations, or also political actions without financial implications).

GAP III talks about external actions – and that’s important ... but that also means political actions and commitments, and these may be more difficult to track. What are these political actions? Is it a declaration ... a joint statement with a country? Is it a partnerships document? Does it mention gender equality, does it not? Are there specific actions in the partnership document? (Interview 28)

It depends on what you refer to as actions. Because GAP is not clear on that. There are contracts and decisions on actions. (Interview 29)

What action is actually new and what really counts as action? It would be simply much easier for understanding, but also for accountability purposes if you just were to speak about the money ultimately. (Interview 2)

EU delegations are not directly involved in negotiating the financial regulation. One interviewee mentioned having limited influence over decisions referring to the EU budget. However, EUDs tend to substantially engage with the NDICI-GE regulation through programming and implementation (Teevan et al., 2021). We explore some of those frameworks below.

The Global Gateway

Consultations revealed mixed views on the extent to which gender-sensitive approaches

have been integrated into the EU’s investments in infrastructure and connectivity through the Global Gateway. But there was broad consensus that the Global Gateway should embody EU values, including a strong commitment to gender equality.

Some interviewees pointed to efforts to mainstream gender in Global Gateway projects. Examples ranged from urban transport to green hydrogen, demonstrating that staff are exploring opportunities to make Global Gateway projects more inclusive. The so-called 360-degree approach³ combines investment in hard infrastructure with action in the enabling environment to ensure that these investments are sustainable and inclusive (Bossuyt and Sabourin, 2024).

In all these Global Gateway [projects], we try to have a gender sensitive approach, and consultations with CSOs ... We promote not only female participation but also empowerment of women ... One of the things we will be doing on green hydrogen is training and there is co-financing to make sure gender policy and mainstreaming is included ... For the future, one of the areas of work is transport. We want gender equality in the transport system. (Interview 5).

Such examples remain limited, however, and achieving transformative change through infrastructure projects was viewed as particularly ‘difficult’ (Interview 4).

Similar to findings from a stakeholder consultation conducted by ODI Europe, respondents expressed concerns that Global Gateway’s increasingly

³ The Global Gateway 360-degree approach aims to create an enabling environment for sustainable and quality investments. It promotes high social, environmental and governance standards (ESG) and includes fundamental principles such as respect for human rights and the rule of law (European Commission, n.d.).

business-oriented focus risks undermining the EU's foundational values and principles, particularly gender equality, human rights, LGBTQI+ inclusion and democracy promotion (Kumar et al., 2025).

I hope we won't forget EU values when we switch to Global Gateway. This business-oriented approach really worries me ... It's completely out of the logic of the EU. (Interview 8)

In this regard, interviewees reported a shift in expectations of the role of Gender Focal Points. Rather than working primarily with CSOs or with a traditional development cooperation perspective, GFPs are expected to increasingly engage with the private sector and financing institutions. They are also under pressure to find gender entry points in projects that integrate a stronger EU interest dimension. Demands from EU headquarters to link projects with gender objectives to Global Gateway have left some staff feeling their expertise is no longer fit for purpose.

For someone like me who has been working in this more traditional approach, we are struggling to understand our role and our new opportunities in this big shift to Global Gateway ... We need to understand the new ways of working, the new actors, for instance I need to better understand how to work with the private sector ... There are possible scenarios, but it's not easy. (Interview 19).

It's a different vocabulary, timing, even the chain of responsibilities has to be different ... When you speak with a bank, you have to speak the same language. But I have the language of human rights and civil society, not so much of the private sector. (Interview 24)

Several respondents were sceptical of the 360-degree approach, perceiving it as superficial.

They tick the box I would say, but nothing more ... This 360 overview of Global Gateway includes gender issues and civil society, but for me, as civil society focal point it's just blah blah, just to tick the box. (Interview 8).

One EU institutional staff member suggested that, while the 360-degree framework seeks to integrate rights and sustainability, partners may find the growing list of mandatory components burdensome:

Of course there is all on paper, there's human rights, gender equality, everything should be integrated, but in reality ... it is a challenge. Because what we have now and even stronger is the green requirement. Everything should be sustainable and green, which is good. But then it becomes too much for some partners ... It's a compromise and a dialogue. (Interview 23)

Another recurring concern was that Global Gateway might replace traditional development cooperation – including in more vulnerable countries – and might be perceived as more transactional and more closely tied to EU political and economic interests. Some EU delegations found it challenging to explain this shift to partner countries, particularly because Global Gateway is not a standard development cooperation funding instrument. This finding is similar to previous research showing that partner countries have had difficulties understanding what Global Gateway actually means.

Since this transition started... there has been a lot of misunderstandings ... We announced thousands and thousands of Euros on Global Gateway, but that was not a fund, a financial

instrument or a basket of funds, it was the expectations of the EU in terms of investments: bringing in the development bank, private sector and everything. So having to explain this to the [partner country] stakeholders has been a pain, it was not easy for them to understand ... Also on our side we are learning by doing. This was the first time we are talking about this, interacting more with investment sector, private banks, restructuring projects and investments. We are all learning by doing, both in the delegation and with our counterparts. (Interview 19).

Despite these challenges, interviewees acknowledged Global Gateway's potential to drive positive impact, particularly by embedding gender equality into large-scale and long-term investment programmes. Some delegations highlighted ongoing efforts to raise awareness about the importance of solid social foundations in the context of Global Gateway to ensure investments are both impactful and sustainable.

Ideally ... I would like to mainstream gender in every area, particular the Global Gateway. Because you can introduce the gender perspective in all these areas, like energy, transport, in so many different things. This is where the big money is going. So this is what we are looking into, towards the future. I've been exploring opportunities with new financial instruments that could have a gender focus, a gender perspective. (Interview 17)

From the point of view of GFPs, one potential entry-point to bring 'soft issues' like gender equality into Global Gateway projects is the emphasis on the genuine added value that the EU can bring as a partner.

The Global Gateway is a strategy of economic development, but which is different from the

others because it is based on European values. This is where we need to be involved and included in the elaboration of the projects since the beginning to make sure that it's rights-based, it's inclusive, nobody is left behind. That's the way we try to frame it. (Interview 11)

Our motto now is Global Gateway – big projects like digitalisation, energy, transport infrastructure ... That's also good, but we need at the same time to defend the specificity of what Europe can bring to these countries, and I think that democratic values and principles, it's clearly the specificity of what we can bring ... because of what we see with the US, it becomes more prominent. We need to defend even more our values. It's OK to work on big infrastructure projects, but we cannot leave out our work on human rights. This is also how we try to defend our position here – the importance of including these parameters even if you want to support big projects in the country. (Interview 14)

Research shows that competition with China or emphasis on 'EU values' are not enough to make the EU an attractive partner (Di Ciommo, Veron and Ashraf, 2024). But, if the EU's offer is based on shared interests and shared values, and adds to the strategic objectives of partners countries (Chen, Faure and Gulrajani, 2023; Di Ciommo, Veron and Ashraf, 2024), emphasising the EU's added value can be an interesting approach. Non-financial elements including technical capacity, institutional autonomy and commitments to shared values also form a source of influence with partners (Chen, Faure and Gulrajani, 2023).

EU delegations are actively looking for ways to integrate gender approaches in Global Gateway and ensure that projects have a positive impact on gender equality.

We have to look into other ways, creative ways through new financial instruments and through Global Gateway investments to make sure women are not left behind ... All these new opportunities, new kind of industries ... we have to make sure that we have this enabling environment and the 360-degree approach, that it trickles down to women as well as men. (Interview 8)

It has been noted that some major financial actors involved in Global Gateway have

significant gender expertise and tools, which could be leveraged to effectively integrate gender-sensitive approaches in private sector investments (see Box 1).

Many of the private sector actors like the EBRD and the EIB also have capacity, gender experts, gender plans, so it's about reminding them they should use what they have, make the proposal and better monitor it. When it comes to women in business, that's been successful. But there could be much more. (Interview 23)

Box 1 Integrating gender approaches in private sector investments: examples of frameworks and tools

Investment actors including the European Investment Bank (EIB) and the World Bank have adopted gender equality strategies and developed practical tools offering guidance, indicators, checklists and best practices to integrate gender approaches in private sector investments.

The EIB has included gender equality goals in its business model and is implementing a Strategy on Gender Equality and Women's Economic Empowerment (European Investment Bank, 2017). One of the pillars of this strategy is support for Gender Lens Investing (GLI), which helps integrate gender considerations into investment decisions and processes to advance gender equality and women's economic empowerment (European Investment Bank, 2024b). The EIB applies Financing for Gender Equality (F4GE) criteria and works through initiatives like the ShelInvest programme to invest in women-led companies, promote women in leadership and in the workforce, and support products and services that benefit women and girls, aligning with frameworks like the 2X Challenge criteria (ibid.).

In the field of public transport, the EIB recently released a study benchmarking existing gender practices in this industry. Based on consultations with key stakeholders in the transport sector, the study offers an overview of policies and practices to include gender-sensitive perspectives in the design and planning of mobility services, as well as good practices. It also identifies persistent challenges to integrate gender approaches in the transport sector, such as the lack of sex-disaggregated data, and provides recommendations for public transport authorities and operators (European Investment Bank and Union Internationale des Transports Publics (UITB), 2024).

In the area of Public–Private Partnerships (PPP), the World Bank has developed a toolkit to mainstream gender in infrastructure. Considering that the inclusion of gender-responsive measures in PPPs can help to further promote gender equality and achieve stronger socioeconomic impacts, the document provides practical tools and guidelines for developing gender-responsive PPPs. It includes an extensive glossary defining terms such as ‘gender-certified business’, ‘inclusive infrastructure’ and ‘gender impact assessment’, as well as design features, measures and specific actions for reducing inequalities through PPPs (World Bank Group, 2024).

Team Europe

Joint action by the EU, its member states and its financial institutions through Team Europe Initiatives (TEIs) is meant to ‘foster synergies by pooling resources, expertise and financial contributions towards critical development priorities’ (European Commission, 2025d). Gender is included as a ‘horizontal priority’, alongside human rights, inequalities, youth and disability (European Commission, 2024a).

TEIs are financed by member states’ bilateral resources as well as by the NDICI-GE. Bilateral sources may not have the same gender targets as EU instruments, and may not systematically mainstream gender in the same way as the NDICI-GE, for example – meaning there are no overall gender targets or requirements for Team Europe Initiatives as a whole. The extent to which gender equality is prioritised in a given TEI will vary according to the motivations and incentives of the actors involved (Sabourin and Jones, 2023). Not all Team Europe Initiatives will have clear gender equality objectives. Concerns have also been raised that, in multistakeholder partnerships involving financial institutions, gender inequality – along with other forms of inequality – will be deprioritised in favour of advancing the commercial proposition (rate of return, profitability, etc.) (MacKellar et al., 2023; CONCORD, 2024).

TEIs can potentially provide opportunities for more coordinated action on gender equality. Some explicitly prioritise this objective: one example is a programme addressing gender-based violence in Colombia, co-financed by the EU and Spain and implemented in cooperation with Expertise France and GIZ. From the perspective of consulted EUDs, collaboration between the EU and member states to support gender equality objectives is particularly valued when it involves shared funding, given that working in a Team Europe approach requires considerable coordination.

If it’s co-funding it is a good idea. If member states, other EU agencies are providing additional funding, yes. If they are only implementing partners, then not necessarily. (Interview 11)

Another interviewee highlighted that Team Europe could provide an opportunity for member states to take the lead on particular initiatives.

The EU delegation does not have to lead on everything ... For example, for everything Team Europe we could appoint one MS that makes sure gender equality is included there ... that would be coherent with what we offer ... Why not have one MS in every Team Europe Initiative responsible for the gender aspects, including with money? (Interview 5)

Finally, in the view of respondents, Team Europe could convey a strong political message by demonstrating that democracies are working collectively to promote gender equality abroad. This is considered an important part of the EU's international identity.

The Team Europe approach is a good idea, it's better to coordinate together. It's also linked to our values, as democracies [are] working together. It's important to show that we can work together. We can do more when we work together. (Interview 8)

Country-Level Implementation Plans

GAP III encourages EU delegations to conduct detailed gender analysis at the country-level through a gender country profile (GCP) and gender-sector analysis. This analysis forms the basis of a country-level implementation plan (CLIP), which outlines policy priorities relating to gender equality, along with proposed actions and objectives (European Commission, 2020b). By the original mid-point of GAP III at the end of 2023, 131 country-level implementation plans had been produced out of a total of 144 EU Delegations and Offices (European Commission, 2023b).

CLIPs are a new addition for GAP III and have been generally well received. The mid-term evaluation of GAP III found that they represent a 'significant step forward' in pursuing gender equality objectives and increase the likelihood that results are achieved (MacKellar et al., 2023). For CSOs, CLIPs are an important tool to ensure and evaluate the implementation of GAP III at the country level (Maes and Taylor, 2023). For EU delegations, CLIPs have helped define a clear roadmap and set of priorities for the EU's work in partner countries, and have connected gender equality objectives to programming.

GAP III was a game changer because of the CLIP, which we worked on with EU member states, so we actually list what we are going to do, what's the priorities and they did the same. We compiled a document, we did an update when we did the mid-term review of the MIP (Multi-annual Indicative Programme). We actually had a roadmap ... We are not in the dark because we knew what we had to do. (Interview 27)

CLIPs vary widely in form, content and quality across countries, in line with the quality of the gender analysis and how recent it is (MacKellar et al., 2023). For example, if an EU Delegation has not updated its gender country profile, the CLIP may not reflect up-to-date priorities for gender equality in the country. Similarly, if those carrying out the gender analysis and drafting the CLIP lack significant gender expertise, it may fall short. This highlights the importance of adequate human resources, in particular internal capacity on gender equality and the externalisation/outsourcing of gender expertise.

A final critique of CLIPs is that they rarely set out a strategic vision for gender-transformative change and the set of forward-looking interventions required to get there. Rather, they end up being a stock-taking exercise of existing gender-related projects (MacKellar et al., 2023).

I think there has been a missed opportunity. When we developed the CLIP, it was more a compilation of what we were doing, more than what do we want to do and who can contribute with what. That could be another way for doing it, maybe for the next GAP. (Interview 11)

4.2 Human resources

A second theme relevant to GAP III implementation relates to the personnel within

the EU responsible for advancing gender equality. A key finding is the large variability in capacity, expertise and commitment to gender equality within and across EU Delegations, and at HQ. Commitment and sensitivity at the leadership level is a clear enabling factor for the successful implementation of GAP III.

Gender Focal Points

At both headquarter and EU delegation level, GFPs and gender experts/advisers play a pivotal role in delivering GAP III. According to the GAP III objectives and indicators, all EU Delegations and HQ external services should have GFPs in place and trained, with job descriptions that refer to their work on gender equality and implementation of the Gender Action Plan (European Commission, 2020c).

GFPs are often expected to lead the process within their units, despite having limited human and financial resources and holding multiple roles. GFPs perform their mainstreaming responsibilities as an additional commitment, on top of their day-to-day work, which limits their ability to engage substantively on gender-related issues (Gianesello et al., 2024). In 2021, less than 40% of EUD GFPs had this role included in their job description, while a quarter of GFPs surveyed in 2023 reported spending 20% or less of their time on gender responsibilities (MacKellar et al., 2023; Maes and Taylor, 2023). The absence of job descriptions is a persistent trend: *'We don't really have a job description as Gender Focal Point. It does take quite a significant amount of my time'* (Interview 10).

Most interviewees – including representatives from civil society and the expert community – clearly identified a lack of capacity, time and, in

some cases, appropriate training or expertise as key obstacles to the effective implementation of GAP III.

'When somebody asks me to work on their documents, I do my best. I'm a focal point, I'm not a gender expert, because I have my own work and I work in other sectors ... social protection, nutrition, conservation of natural resources, agroforestry ... so doing gender is not like the main part of the work, but part of it' (Interview 27).

The gender focal points are not only focal points on gender, they are covering so much and also at HQ ... INTPA are supposed to undertake monitoring, but they are ... two or three working on gender ... there are so many country offices, so it's not feasible [to track all the programmes]. (Interview 23)

GFPs' responsibilities are wide-ranging. They include designing and managing gender-specific projects, organising consultations with civil society, drafting foundational documents such as Gender Country Profiles and CLIPs, monitoring and reporting on gender equality outcomes, shaping the gender dimension of policy dialogues, and co-ordinating with international and local stakeholders and funding partners. GFPs are also responsible for gender mainstreaming: they contribute to programming exercises to ensure that gender considerations are integrated across delegation activities, and support and advise colleagues including providing up-to-date guidance and tools for the preparation of action documents and initiatives.

Most GFPs interviewed have relevant knowledge about gender equality issues in their specific contexts and can offer valuable insights into local trends, as well as comparisons with other regions. However, most of those interviewed were new to

either the role or the delegation. Some had been appointed due to their experience in related fields – such as migration, civil society or human rights – without necessarily having specific expertise or training in gender.

Our gender focal point left a year ago ... Since he left, I'm not fully replacing him, but doing some kind of replacement, but I'm not full time. My focus is on governance, rule of law, CSOs, Human rights, democracy, and now gender. This was to be a full-time job, but it's only part of everything else that I do. (Interview 6)

I am the GFP since the 1st of April. Another colleague used to be GFP for the last two years, but she's now left to Algeria. I'm also the human rights focal point and focal point for communications and migration. (Interview 20)

Many GFPs occupy lower positions within the organisational hierarchy and lack decision-making power, limiting their ability to drive the gender agenda.

There is a general tendency in international organisations ... the GFP tend to be the junior staff. GFPs are not very high up in the teams, they have little leverage to drive the gender agenda and they don't have a decision-making power. (Interview 28)

It also depends on where that person is – if it's somebody from the EU, a local, junior or not. Being from the [partner] country can definitely be an advantage if they have a lot of experience in that sector and context. But sometimes, if they have just started, if they are junior, not from the EU, it can be also a disadvantage. (Interview 26).

Certain factors can help enhance impact, notably the length of time in the role. This helps GFPs leverage institutional memory and relationships with in-country partners (MacKellar et al., 2023).

I arrived in this country in 2020 and until recently the management was not very aware of gender ... I was trying to find money and to influence throughout the steps, also trying to develop cooperation with civil society and other member states ... I was speaking with colleagues so they could have the good will to incorporate a gender perspective ... Now we are organising various trainings, we have a technical assistance on gender, focused meetings to prepare for the Human Rights review of the UN, and a network with feminist organisations ... Since 2023, I am collecting the fruits of what has been planted. (Interview 24)

In summary, despite the pivotal role that GFPs can play in delivering on GAP III, uneven awareness and expertise across GFPs and EUDs leads to varying levels of implementation when it comes to gender-sensitive and gender-transformative actions as well as gender mainstreaming.

EU Delegations

Responsibility for gender-transformative actions cannot lie with GFPs alone. By definition, gender mainstreaming requires a broader approach that involves building capacity within delegations and at HQ. According to the GAP III objectives and indicators, 100% of management at EU Delegations and HQ external services should receive mandatory training on gender equality and GAP III (European Commission, 2020c). Yet recent research finds that there are substantial gaps in knowledge at all levels of EUDs, suggesting

that capacity is lacking and that gender has not yet been fully institutionalised (Maes and Taylor, 2023; Giancesello et al., 2024).

Adequate training and capacity development are key to building gender expertise within EU Delegations. This is not simply a one-off training module or a tick-box exercise but, crucially, requires sufficient training to allow staff to feel confident in understanding, proposing and implementing gender-transformative actions – integrating gender equality across programmes, and at the same time relieving pressure on GFPs who may feel solely responsible for this.

The EEAS reports that it has its own gender experts and currently supports a network of GFPs in 73 divisions (out of how many in total is unclear). A number of delegations and HQ have conducted training programmes on gender-responsive leadership. According to our consultation, 86% of managers have received training in at least one module of the gender-responsive leadership programme (Interview 28).

Heads of Delegation play a particularly important role as a key decision-making authority, and their commitment to gender equality is a ‘decisive factor’ in translating GAP III commitments into tangible action (MacKellar et al., 2023). Examples from our interviews suggest that women’s leadership may be particularly conducive to advancing gender equality across the work of EU Delegations, although male Heads of Delegation have also demonstrated strong commitment. Despite some progress, the gender balance within the EU diplomatic service remains far from parity: the share of female Heads of Unit increased from 27.7% in 2019 to 35% in 2025, while men still account for 65% (down from 72.3% in 2019) (European Parliament, 2021; EEAS, 2025).

Gender now has the support of the highest level in our team, the Ambassador. That helped a lot. It’s not always the case that you have the chance to have a woman Ambassador and have this level of support for gender. But it is our case ... Gender equality is no longer something that’s left only for the GFP alone. Now my colleagues in each sector talk about it in their respective areas, like rural development, civil society, etc. (Interview 19).

I think that it does make a difference to have female ambassadors on two scores. One, I think they are more conscious and more active when it comes to gender issues. There’s nothing given about that. It’s not necessarily the case ... we had high-level visitors from Brussels who are women and really didn’t want to address the issue, didn’t want to take the opportunities. But, the women ambassadors that I have had have been active and keen to take up the issue. That’s not to say that the issue has not been priority under the male ambassadors that I’ve served. But I think that I noticed, yes, there is a difference in the enthusiasm and ... that female ambassadors are listened to more with respect to gender issues. (Interview 31)

The EEAS has recently come under considerable budgetary pressure. A reform plan for the EU’s diplomatic service, to be implemented over the next two years, proposes a reduction in personnel and the introduction of ‘super-delegations’ or regional hubs (Moens and Barigazzi, 2024). This restructuring is likely to further diminish EU delegations’ capacity to implement GAP III.

Externalisation of gender expertise

A final aspect relating to human resources concerns the outsourcing of gender expertise to external actors. This could be through hiring

consultants or agencies like UN Women, for example, to carry out gender analyses or draft the gender country profile/CLIP (MacKellar et al., 2023). External gender expertise can be useful in addressing the capacity constraints in EU Delegations identified above. However, this will not address the underlying issue of limited knowledge and understanding on gender issues unless capacity development and knowledge transfer are included as part of this external support.

The outsourcing of gender expertise without requisite capacity development compromises the responsibility and accountability of EU Delegations to mainstream gender in all policies and actions, as per GAP III (European Commission, 2020b). Interviewed GFPs reported benefiting from technical assistance in support of GAP III implementation, for example in developing context-specific gender indicators for individual projects. However, in cases where technical assistance was discontinued, delegations' capacity to design and monitor gender-related actions has likewise been reduced.

4.3 Financial resources

Another key factor for the implementation of GAP III is adequate financial resources channelled towards its aims and objectives. Two main issues arise: the lack of a mechanism to accurately track expenditure on gender equality, and the limited funding allocated to women's rights organisations (WROs).

Expenditure on gender equality

The NDICI-GE's targets⁴ provide a strong incentive to mainstream gender and allocate financial resources from the EU's external action budget towards gender equality and women's empowerment (EU, 2021). However, as noted the targets in GAP III and the NDICI-GE refer to the proportion of actions, rather than the proportion of funding. This ambiguity, along with aspects linked to the design of the OECD DAC Gender Marker, makes it difficult to accurately track expenditure on gender equality.

The OECD DAC Gender Marker guidelines recommend that the total budget of a project/ programme is counted as gender equality-focused even if just one of its objectives refers to this goal. This is in response to the need to minimise donors' reporting burden (OECD, 2016). Moreover, like other OECD DAC policy markers the Gender Marker applies to spending commitments rather than actual disbursements (ibid.). In practice, the marker is unable to accurately track how much of the EU's financial commitments are specifically contributing to gender equality (George and Gulrajani, 2023). There may also be discrepancies between commitments and disbursements.⁵

I think it is possible to track [disbursement for gender equality], at least those for G2. But for G1 it is a problem because it's gender mainstreamed, but how much is it gender mainstreamed? So to say that this many million are under mainstreamed, what does it actually mean? ... For the G1 there is no requirement that there should be a budget for gender equality

4 At least 85% of new actions should have gender as a principal (G2) or significant (G1) objective, and at least 5% of these actions should have gender as a principal objective.

5 The OECD Gender Marker is applied at commitment stage and not reassessed even if the commitment is lowered/ does not happen, or if the nature of the project changes, including regarding its contribution to gender.

and I think that if that was a requirement, then it also needs to be shown in the budget, because it costs money. (Interview 23)

That's the problem with the gender marker 1 and they take the total amount. So let's say you have €100,000 project and it's marked gender marker 1 but they say all €100,000 goes towards gender marker 1 when in fact it might only be €20,000. (Interview 12)

EU institutions also appear to come up short against their own targets. According to recent OECD analysis, in 2022–2023 58.8% of screened bilateral allocable ODA was committed to gender equality and women's empowerment. The share committed to gender as a principal objective was 2%, against the 5% target (OECD, 2024). These figures should be put into perspective: EU institutions still provided the largest volume of ODA with gender equality as a policy objective (together with Germany) over 2021–2022 – totalling \$11.4 billion per year on average (ibid.).

Funding for women's rights organisations

Women's rights organisations (WROs) play a critical role in promoting democracy, gender equality and fundamental rights. Being embedded in local, national and regional settings means that WROs offer contextual knowledge which other actors (especially external actors, including international and even national agencies and entities) lack, and would struggle to build (Maung et al., 2025). This grounding means that WROs are aware of 'gaps, needs, risks, norms and power relations' within the local community (Njeri and Daigle, 2022). WROs are also well-positioned to understand the intersecting and complex needs of marginalised groups.

WROs remain chronically underfunded globally. According to OECD data, in 2020–2021 DAC donors committed \$574 million in ODA to WROs, down from \$581 million in 2018–2019 (OECD, 2023b). This corresponds to less than 1% of total ODA with gender equality objectives. Although the EU and some member states (France, the Netherlands and Sweden) were among the largest donors of ODA to WROs in 2020–2021, less than 0.6% of EU gender equality ODA was allocated to WROs (OECD, 2023a; Coordination SUD, 2024). Speaking from the perspective of the Western Balkans, one interviewee noted that many WROs fight corruption and defend human rights and democracy in their countries, and could be strong allies for the EU in addressing the rise of Eurosceptic attitudes in the region, if only they had more support.

The EU still doesn't understand that most WROs are highly political and influential organisations in their countries. If the EU would understand that, they would find a biggest ally in the society, because the EU's position at the moment is not the best. (Interview 3)

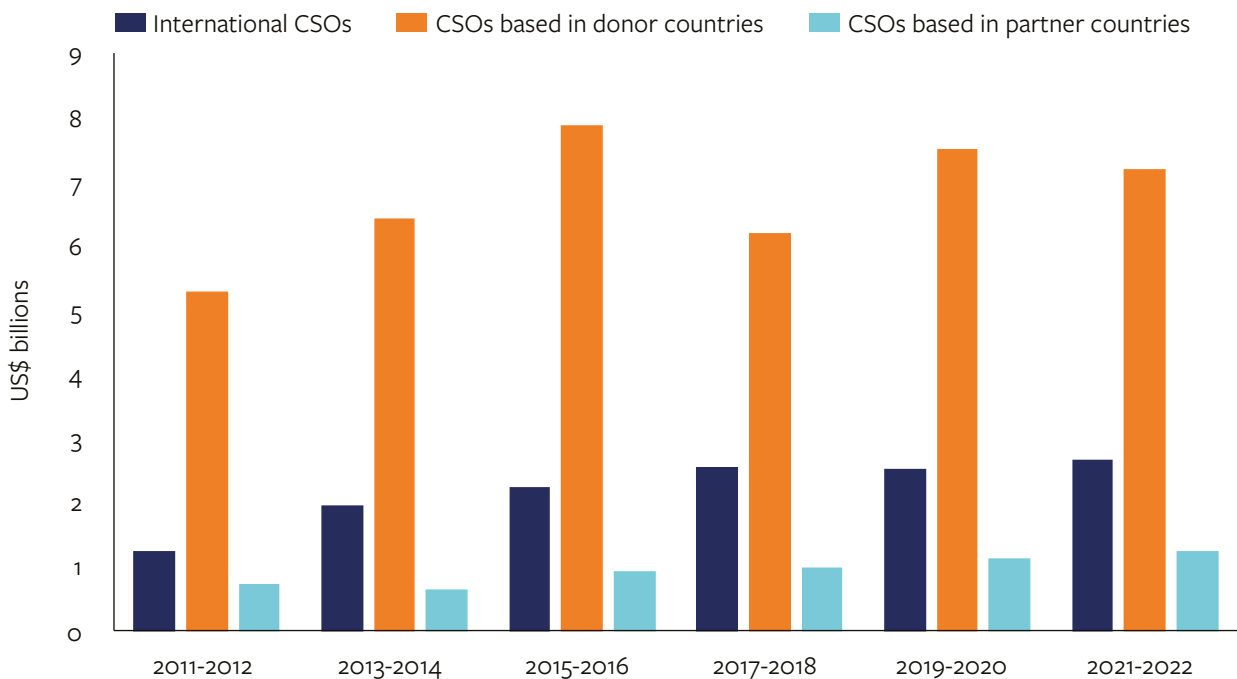
Recent ODA cuts by the US and European donors will have a significant impact. In March 2025, UN Women surveyed 411 WROs in 44 crisis settings, and found that 90% reported being financially impacted by the US cuts, with 47% expecting to shut down within six months if current conditions persist (UN Women, 2025). The thematic areas reportedly most affected were gender-based violence, protection, livelihoods and cash assistance and healthcare (ibid.).

The vast majority of gender equality ODA still flows to or through partner-country governments and multilateral agencies (OECD, 2024). Although half of funds to CSOs were allocated for projects having gender equality objectives in

2021–2022, only 11% of that reached CSOs based in partner countries, while 22% was channelled

to international CSOs and 66% to CSOs based in donor countries (OECD, 2023): see Figure 6.

Figure 6 Volume of ODA with gender equality objectives by type of CSO, 2011–2022



Source: OECD, 2024

Our consultations identified several barriers preventing EU funds from reaching WROs directly. Within the EU, the main obstacles appear to be path dependency, complex bureaucracy and a preference for fewer but larger contracts. Externally, the key challenges are the capacity of local NGOs and WROs, formal restrictions imposed by partner-country governments, and the shrinking of civic space in certain contexts.

The first challenge at the EU level – path dependency – creates a tendency for European institutions to collaborate with the same, established partners. These are most frequently

ministries and other governmental bodies in partner countries, or multilateral organisations, particularly those within the UN system.

The EU is working with usual relationships, usual partners, with specific groups ... Many times the EU, and specifically EU delegations, work based on a pre-arranged coalition of organisations that they have been supporting traditionally, which from a funding point of view has proved beneficial. (Interview 7)

So the EU is actually used to working with governments, most of the time. And it has learned that a ministry is more effective than another, it has a better absorption capacity

than others ... and they will keep doing that because it's just a reassurance that if you have a lot of resources and big stakes and you need to deliver and with all the accountability, evaluation frameworks, monitoring and exercises that the EU has to do the reporting to the member states. (Interview 2)

The second internal challenge relates to the EU's administrative and bureaucratic burden. Smaller organisations appear to be systematically excluded from EU funding largely due to the complex requirements of accessing EU funds (Coordination SUD, 2024). Interviewees noted the lengthy procedures involved, particularly in relation to reporting. Many of the EU delegations consulted expressed the view that local NGOs often struggle to meet these demands and are frequently unable to absorb large volumes of funding.

I think with our financial instruments in terms of awarding, I don't think we have much of a choice [about working with international NGOs or UN agencies], our processes are so complex that there is no alternative ... It's a recurrent criticism that we receive from CSOs and women-led organisations, that they want to implement the project, but very often their capacities are not adequate. (Interview 11).

It works well with partners who are used to working with these tools. If you go to usual suspects like the UN ... the member states, they know what needs to be reported, the fact that numbers need to be disaggregated by sex – that kind of stuff. It becomes much more complicated when you're working with smaller organisations, especially the local ones, they really struggle, you know the EU bureaucracy is generally very heavy for these organisations. (Interview 16)

The point and the issue we are facing here, and maybe also in countries around, is that the capacity of local NGOs is very low. So, considering our processes, our standards also in terms of accountability, we cannot take the risk of having direct contract with local NGOs and also for contract management, we cannot have like 30 contracts. It's easier for us to manage fewer contracts. (Interview 14)

The third challenge restricting the flow of EU funds to WROs is the recent shift towards favouring a smaller number of larger, more substantially funded contracts. This trend has been attributed partly to the administrative burden that managing numerous contracts places on programme managers, but also to the perception that larger contracts provide the EU with greater visibility.

For us at the delegation level it's easier to manage one contract of 10 million than 10 contracts of 1 million. There is this focus for the last 10 years or so to have less contracts and bigger contracts. (Interview 8)

From an administrative point of view, it's very difficult for us to do targeted, small-scale interventions. Because our contractual implications are a nightmare. Which is why we do 50 million Euro projects, because it can take a whole year to sign a contract. (Interview 20)

We are constantly under pressure to sign fewer contracts. (Interview 25)

The level of experience, activity and professionalisation of local WROs and wider civil society is another factor. In some contexts, civil society is highly active, well-organised and capable.

In others, CSOs are less developed, with limited capacity and insufficient professionalisation to meet the EU's requirements or absorb its funding.

It's working well with the local women's organisation, but there are not so many. (Interview 24)

What we struggle with is that the organisations here are very small and we had cases whereby granting them funds – even though not what we would consider very much – we've had cases of like killing small CSOs and I don't want to do that again. (Interview 16)

Civil society is surprisingly weak here, compared to what I've seen in other countries. At least on some areas. It's also a high task to write an application in English ... If you are doing it for the first time, it's hard. But I'm still a bit surprised by the level of applications we receive here. So that's certainly a challenge. Hopefully they will become better. (Interview 25)

Partner-country governments are increasingly imposing formal restrictions on foreign funding to local NGOs. This is making direct support for civil society and WROs more difficult.

There will be a law on grants, so if I want to support a CSO which is trying to empower women in a small village, I have to apply to government to ask for permission to do that ... So the legislative context is becoming increasingly difficult – might end up being impossible – both for me as a donor to provide the grant and also the CSO to receive the money. (Interview 22)

Even in the absence of formal restrictions on foreign funding, political conditions for civil society can be difficult. Local WROs and women's

and feminist movements in particular – along with LGBTQI+ organisations – tend to be the first to be affected by (and to fight against) shrinking civic space (Maes and Taylor, 2023; Coordination SUD, 2024). In some cases, these organisations do not feel safe engaging with or receiving funds from the EU due to the political risks this may entail.

Throughout the last years the shrinking space for civil society organisations in the MENA region has been intensifying, with attacks from states where these groups are active ... This also has an impact on what groups the EU can fund and what groups feel comfortable with receiving funding from the EU. (Interview 3).

We have seen, when the ambassador travels to the regions, there are some people we invite to take part in events, they say, 'It's OK if I don't come? Because there are risks for me to be too closely seen with the EU', particularly in the regions. (Interview 22).

A number of EU delegations have sought to ensure that at least part of the EU budget reaches local feminist and women-led organisations. In many cases, delegations have relied on funding instruments originally designed to support civil society, human rights or democracy, tailoring calls for proposals to include specific requirements.

Examples include a thematic focus on gender issues; provisions that encourage consortia of applicants involving smaller CSOs; and requirements that larger CSOs work in partnership with smaller ones. In some cases, calls for proposals have included stipulations that a percentage of funds should be channelled from larger to smaller CSOs.

We don't have a dedicated budget line for WROs. They are usually co-applicants, but we

make sure that they are co-applicants ... We can't fund the WROs directly, but we make sure that bigger organisations that are awarded the contract work with those in the field. It's already described in the guidelines, call for proposals. I think it's a good way to make sure they are there. Sometimes we can even put a percentage of the budget that needs to be channelled. It depends on the proposal. But very often we do that. Maybe including those requirements in the call for proposals is the only way that we can make sure our funding reaches those organisations, because the way our funding works, I think it would be basically impossible for them. (Interview 11)

We managed to secure some funds in the Human Rights and Democracy budget lines, so we had a top up of one of the projects which was also supporting the grassroots organisations here who were advocating against the repeal [of law prohibiting female genital mutilation]. (Interview 16)

Delegations have also partnered with umbrella organisations to cascade funding to local grassroots groups and strengthen their capacity. As respondents explained:

Very often we fund bigger civil society organisations to support smaller CSOs and we very often have grants where the primary purpose is to re-grant. So that's how we support civil society. The subject areas come second. The main purpose is that they become better at what they do. (Interview 25)

[Working with] bigger civil society [organisations], I would say it's also what we are doing through these framework partners,

to use them as a way of channelling funds and building capacity and supporting those [smaller organisations]. (Interview 23)

This approach can enable funding to reach WROs that otherwise would not be able to get it, and provide protection for WROs operating in restrictive settings. At the same time, however, intermediaries are often unaccountable, and may exert undue influence on a WRO's operations and priorities, or take credit for their work (Maung et al., 2025).

4.4 Political will

Gender relations and inequalities relate directly to power. This means that gender-transformative change can often be enabled or hindered according to the level of political will (Michalko and Somji, 2023). In the case of GAP III implementation, this primarily relates to political will at the EU level, with like-minded states and within partner countries.

EU level

The level of political commitment to gender equality in Brussels sends a strong signal to EU delegations and has an impact on their work (Gianesello et al., 2024). As discussed in Section 2, gender equality is currently a low priority within the EU, both internally and in its external actions. More than 50 CSOs from across Europe have expressed their 'shock and dismay' at the Commission President's decision to do away with the standalone EU position of Equality Commissioner in 2024, describing it as a 'downgrading' of efforts to address inequality and discrimination (Kassam, 2024). Guerrina et al. (2023)'s study of post-Covid-19 recovery plans finds that the value formally afforded to gender equality was not necessarily accompanied by

measures to put these principles into action. They find little evidence that the EU or member states have been fully committed to centring gender equality, gender mainstreaming or intersectional approaches.

Some interviewees reported a declining level of interest from headquarters in gender-related actions, while others observed that backlash against gender equality appears to be more challenging within Europe than in their local contexts:

Since the last two years, Brussels is not interested anymore on gender, they are interested in Global Gateway. Everything that is not Global Gateway was pushed in this 'Vision 360'. But it means nothing ... The money doesn't go to gender anymore. Gender is no longer a priority in headquarters and there is this dumping effect that is not a priority anymore. (Interview 24)

Even if in this country there is a more conservative trend at the moment, despite that I don't see it [the country] going backwards, regressing on the questions. I see it less than in Europe. (Interview 29)

Like-minded states

One factor that appears to create more favourable conditions for supporting gender equality is collaboration with like-minded countries, both in multilateral fora and in partner countries. In several instances, cooperation with countries such as Australia, Canada, Iceland, Switzerland, New Zealand, Japan, and the United States (prior to the Trump administration) was reported to have been particularly valuable to the EU.

On the world stage, the EU and Iceland are like-minded actors, supporting each other in a number of areas. Iceland shares the EU's support for the multilateral system and often aligns itself with the EU on foreign policy issues. Iceland is not as much represented abroad through delegations, but they work on development cooperation projects in a few countries, notably in Africa and try to emphasise gender equality. We have been trying to link up to them in the field. (Interview 15)

In our programmes, with our resources, we need to choose priorities. Of course there are other elements that are very important for [gender] equality, but what we do here from a strategic perspective is to finetune our interventions with other donors. We are in a part of the world where we are quite a small donor, compared to the others. Here we are the sixth donor. Before us, it's mainly Australia, New Zealand, Japan, World Bank, USA before Trump. We try to complement what other bigger donors, like-minded partners are doing. (Interview 18).

A shared feminist foreign policy (FFP) approach likely facilitated increased coordination among major gender equality champions and created a conducive environment for this agenda globally. In 2023, 15 countries had declared the intention to adopt or adopted a FFP (Michalko, 2023). FFP countries engaged in groups, networks and initiatives including ministerial conferences (Ministère de l'Europe et des Affaires étrangères, n.d.) and the Feminist Foreign Policy Group (FFP+) (Ministerio de Asuntos Exteriores, Unión Europea y Cooperación, 2024) to defend gender equality at multilateral level. However, the concept of FFP has been losing momentum recently, and key proponents including Sweden, Germany and the Netherlands have distanced themselves from it.

Partner country level

Commitment to driving gender-transformative change often depends on the partner country's own political priorities and enabling environment. The EU cannot impose its own agenda in partner countries, and increasingly the EU's support for gender equality is being met with resistance as a 'Western' or 'foreign' value allegedly at odds with local, national, traditional or religious norms (MacKellar et al., 2023; Browne and Somji, 2025):

From my perspective there is no advantage in trying to push that agenda in a country without being politically smart, where there is also a lot of questioning. Who is the EU to ultimately push that agenda? Because it's our own [the EU's] agenda rather than engaging in a serious conversation with the change makers and the actors that can make change happen, so [they] have to be convinced within every context, and [the EU has to] do that in a way that is culturally sensitive but also politically smart. (Interview 2).

Some governments may be difficult to engage with because gender equality is not a priority, or because the political environment generally is repressive:

The country is going through a very difficult moment. There is a change in this government ... [it is] going towards a top-down approach ... they have asked us to erase mention to SRHR in schools, to change the language. At the technical level they still allow us to intervene, but sometimes it's a question of semantics. Now we tend to talk more about integral health. (Interview 17).

There is this concerted backlash in the country, which is also affecting the mentalities of people and as in many countries, a backlash on women's

rights and gender equality. It's very difficult with a government which is absolutely not listening to us and just refusing even to engage with us ... The programming for activities in [this country] has been extremely difficult because of this political turmoil which has led to a constant reprogramming of what we can and can't do. (Interview 22).

Many stakeholders consulted for this research pointed to growing constraints being imposed on international partners like the EU, and a general shrinking of civic space. This trend is closely linked to a rise in government restrictions on foreign funding to NGOs over the past two decades: more than 60 countries have introduced policies to regulate, restrict or even cut off foreign funding to NGOs as part of a broader backlash against global liberalism (Bromley et al., 2020). These measures are often justified as efforts to protect national sovereignty from 'foreign' influence.

4.5 Accountability

A final theme relating to the implementation of GAP III is the degree of accountability at various stages in the process: consultation, implementation and monitoring and reporting, relating particularly to the OECD Gender Marker.

Consultations

The guidelines for implementing GAP III state that the drafting of gender country profiles (GCPs) and country-level implementation plans (CLIPs) should be in consultation with 'national stakeholders and other actors' (European Commission, 2020c). The intention is to ensure that diverse groups' needs are taken into account and to promote visibility and shared ownership of implementation plans (MacKellar et al., 2023).

The majority of EU delegations interviewed reported working with CSOs and WROs. However, for actors outside EU institutions the quality and depth of this engagement is questionable, with plenty of room for improvement (Kvinna till Kvinna Foundation, 2020; Maes and Taylor, 2023). For instance, the extent to which WROs have been involved in the development of CLIPs varies significantly.

The process of drafting the CLIPs should include and involve women's rights organisations. However, the extent to which they were involved differed from country to country. In some countries, women's groups were hardly consulted at all. In others, they led the process ... Kosovo and Macedonia have been used as best practices because [WROs] were actually contracted by the EU to lead the process ... because of the network, it ensured that women's voices were heard throughout the process of establishing the CLIP ... Where women's groups are not contracted and involved, where UN women and others have led the process, WROs have been less engaged. (Interview 12).

Engagement with local CSOs is often limited and restricted, focusing mainly on a few larger NGOs or networks, while consultations are not sufficiently inclusive – particularly of organisations in rural areas, and those led by people with disabilities, LGBTQI+ people and those facing other forms of intersectional exclusion or discrimination (Ball, 2023). CSOs also highlighted a lack of proper follow-up and an absence of structured dialogue with civil society, noting that participants are rarely informed about whether, and how, their contributions have been taken into account in the work of EU delegations.

In partner countries a handful of well-established organisations are familiar with GAP III, whereas smaller, grassroots organisations often receive little or no information about it.

Local organisations are not aware of GAP; it is not something that is proactively communicated to women's rights organisations ... A few really established, well connected, major women's rights organisations were aware of what the plan was ... But it was not something that came to the attention of the broader movement and even less to smaller, more grassroots organisations. (Interview 7).

When it comes to the political dialogue, there are things that are happening ... There are countries with good practices where civil society organisations and women's civil society organisations are included in all meetings. And then there are countries where they're only consulted, for example on justice, freedom and security ... It's also a challenge because usually for the EU the way forward for these consultations is to consult networks ... but the organisations who are not part of networks, platforms ... there should be a way to consolidate the information on what are the active CSOs working on gender in certain countries that should be involved. (Interview 3)

Even the consultation process within EU Delegations for drafting gender implementation plans like CLIPs presents a mixed picture. Some delegations involve a wide range of EUD staff in these discussions and seek their substantive input, while others hardly engage with wider staff. This lack of an institutionalised approach means there is significant variation in the extent of internal consultation, despite more inclusive processes yielding stronger EUD-wide ownership of these

gender implementation plans and increasing the likelihood of successful gender mainstreaming (MacKellar et al., 2023).

Monitoring

Monitoring remains one of the most critical challenges hindering GAP III implementation. When they are monitored, gender-related initiatives tend to be reported in terms of outputs rather than impact. For example, when asked about types of initiatives, many consultations mentioned organising events, such as on International Women’s Day or the 16 Days of Activism against Gender Violence. When asked about how impact is assessed, simple disaggregation of results by sex was often mentioned.

When reporting the results, at a minimum we have to disaggregate data between women and men, age, etc, and the benefit of what we do to the different groups, also in terms of age. (Interview 14).

For example, if the project is on agriculture, what percentage of women do you target? ... The lead applicant always includes female youth in their citizenship training, and they give us the percentage. Then we can understand how many women participate in the project. (Interview 6).

Since EU delegations can select the GAP III indicators they wish to report on, there does not appear to be a clear mechanism for comparing results over time or for aggregating them. In addition, we identified significant inconsistencies in the Commission’s monitoring exercises, as well as issues with the correct and coherent application of the OECD-DAC Gender Marker by EU delegations.

Several delegations reported that they had not conducted impact assessments of their interventions. This is striking given that, according to the original timeline, implementation of GAP III would now be in its final stages. GFPs often face challenges with data availability, which they explain as largely due to the quality of the information provided by implementing partners (contractors, NGOs, Member State or UN agencies).

The absence of mechanisms for consolidating or aggregating data appears to be an additional challenge.

We assess [progress on GAP III targets] through projects specific to gender equality and monitoring missions. We haven’t done a global evaluation of our interventions on gender yet ... Our main difficulty in reporting is that the main part of reports does not make the differentiation between sexes, they make a general reporting of the project overall ... Being frank, we have a hard time to assess the gender impact of our projects. Reports are produced by the implementing partner ... Every project manager gives guidance, but I’m not sure this is done in a very structured manner. We have a lot to improve in this area. (Interview 4).

The GAP document states that ‘Commission services, in cooperation with the EEAS, will monitor progress each year on implementing GAP III’ (European Commission, 2020b: 23). While EU delegations reported completing annual surveys at the request of HQ, there was some confusion and variability regarding the focus and level of detail. Tracking progress as an external stakeholder is particularly challenging, given that the EC no longer publishes an annual GAP implementation report (Maes and Taylor, 2023).

Regarding the annual survey, some EU delegations indicated that it focuses specifically on GAP III, while others described it as whole-of-delegation reporting – to which they contribute a gender section. Delegations can choose the indicators on which they report, and reporting tends to emphasise narratives rather than quantitative indicators. Changes in HQ requirements have made reporting more flexible and less demanding, with programme evaluations no longer mandatory.

Evaluations are what we are supposed to do at the end of programmes or projects to assess impact. It used to be a requirement, but when we had the simplification, with relevant DG promising to have less burden on our work, one of the things we kind of ... gave away was evaluation. Now evaluations are no longer mandatory. It doesn't mean that we no longer do them, but ... when something is no longer mandatory in the EU system, it falls down the trail ... it's just one less thing to do and one less procedure to worry about. (Interview 27).

While delegations noted that HQ colleagues are supportive and carry out quality control of actions, they often receive little substantive feedback from HQ on their reporting. Delegations also observed that HQ's interest in monitoring gender-related actions has declined in recent years, reducing the incentives for delegations to provide detailed information or undertake rigorous assessments of gender targets.

I still find it difficult to aggregate quantitative results. The staff working document has a long list of indicators ... Initially, I used this as an inspiration, and I was very strict with my colleagues to use the indicators. I thought ... we would be asked to report on a yearly basis on how we've been performing on some of

those indicators ... At the end there has been no demand from HQ around this. I think partly they do it through the result reporting exercise ... part of the results are aggregated like that ... they came up with this staff working document ... a heavy document with quasi a million indicators and ... I felt it was not very followed through. (Interview 10).

When I started two years ago, reporting was part of the mid-term [review], then it was very detailed. Every year we monitor the number of G1s, G2s etc, that comes through the system ... they also asked for each section of the GAP that we should describe what we were doing, if there have been any good practices. That was very comprehensive. Now it's more of a few questions every year ... I don't think INTPA has time to really make an analysis, and provide feedback. Ideally, they should also provide feedback on the reporting. (Interview 23).

Most interviewed delegations felt that they were meeting the 85% target for gender-significant or gender-principal actions, but acknowledged the absence of a systematic mechanism to track this. Interviewees noted that gender is considered a cross-cutting or horizontal priority, with GFPs seeking to include gender indicators in most, if not all, actions.

I'm not sure colleagues in the cooperation session do monitor that because it's not so easy, it's not so straightforward to assess the 85%. 85% of all actions should have a gender dimension; I would say yes. It doesn't necessarily mean it's a priority of all actions. It won't be correct to say that for 85% of our portfolio gender is a priority. It's a horizontal priority. Between G1 and G2, I never understood really how they work, how they measure this. (Interview 21).

We don't create our events simply in order to meet the targets. We try to put gender at the top of our priorities in whatever we do. So I have to say this 85% is not something that we specifically address ... I think that we just put the focus on gender issues wherever we can. (Interview 31).

According to one interviewee's information based on official sources, 60% of delegations have at least one G2 programme in place. We observed a similar proportion in our sample of consulted EUDs: eight out of 22 (approximately 36% of our sample) reported not having a G2 programme or action in place. As noted, there was some confusion regarding which types of gender actions should be counted when assessing progress on the targets, and whether this should include only project-funded initiatives or also political ones.

In some cases, the absence of a G2 programme was explained by the partner country not being eligible for foreign aid, illustrating that GAP III targets remain primarily linked to the development cooperation sector. In other instances, reasons cited included a lack of available funds or broader challenges related to implementing development cooperation programmes in the partner country, such as a restrictive political environment.

OECD-DAC Gender Equality Policy Marker

Despite its limitations, the OECD Gender Marker remains a useful accountability tool; it is essential for tracking the EU's commitments to gender equality, and enabling comparability over time and across OECD-DAC countries. What is less clear is the extent to which reporting on these targets is accurate. For instance, many EUD staff are unsure of what counts as a G1 (gender-significant) action. As there is a strong incentive to meet the

85% target and classification is self-reported, the G1 gender marker ends up being applied liberally and in some cases incorrectly – leading to an overstating of the share of projects with gender equality objectives (Ball, 2023; MacKellar et al., 2023; Maes and Taylor, 2023).

In our regional report covering all six western Balkan countries, the findings are not very promising. There is a huge increase in action documents being marked with the gender marker one or two. But when we looked a bit deeper, we saw that they are not actually fulfilling the OECD DAC criteria to be marked with gender marker one and two. This is not new to GAP III, it has been an issue with GAP II before ... When you read through EPA documents, it looks like actions are contributing to furthering gender equality, but in practice, this is not happening. (Interview 3).

Sometimes the G1 marker can be inflated. In the contract or the conditions for financing, we write that it is G1, we quote things. When you check the contract it reads 'mainstreaming', but there is nothing concrete, there are no concrete indicators on it. We tick the box. (Interview 29).

One interviewee recalled how producing gender-disaggregated data in the monitoring of a given action led to that action being marked as 'gender-significant':

Most of the programmes will be G1. But even for G1, we require that in the objectives or in the reporting that you have gender disaggregated data. (Interview 5).

To address this, three areas for improvement emerged from our consultations.

First, training for EU delegations on the correct application of the marker could be strengthened and regularly updated, alongside increased capacity for GFPs and HQ to conduct quality control checks. As reviewing all projects at HQ level would place a considerable burden on the small teams responsible for gender issues, periodic in-depth quality assessments of a representative sample could be a more feasible approach.

Second, the threshold for classifying projects as G1 could be raised. Some interviewees proposed that G1 projects should be required to allocate a defined proportion of their budget specifically to gender-related activities. This would improve the accuracy of G1 project classification, and strengthen the tracking of financial expenditure for gender equality and securing funds for gender objectives, which is currently lacking:

There could be a requirement for example that 10% of the budget should be dedicated to gender in order to call it gender mainstreaming ... this would make more sense and would make it easier to say it is gender mainstreamed. If there is a programme on economic development, usually they add a component on women's economic empowerment, but it's not reflected in the budget. If this was the case, then it would be easier to track and monitor what actually goes to gender equality ... In other cases, they have a consultant to support with gender mainstreaming ... at least their salary could be there, in the mainstreaming costs. (Interview 23).

Finally – and related to the previous point – some stakeholders proposed complementary monitoring of actual expenditure on gender equality. This could build on the contract and budget information already recorded by EU

delegations in the Commission's IT systems (such as OPSYS), providing a more reliable basis for assessing actual investments in gender equality.

Our proposal is to have both. You can use the policy marker which is used globally and is standard, and they could still use OPSYS to track actual financing. It is possible to do both and not undermining either one because they measure different things. (Interview 12).

5 Conclusions and policy recommendations

While GAP III built on a series of evolving EU frameworks to promote gender equality globally, and was launched in a relatively conducive policy environment, the current political context presents significant challenges. There is a real risk that EU policy-makers withdraw support to gender equality, as the considerably weakened financial backing for gender equality in the new EU budget proposal suggests (Gianesello et al., 2025). The EU's priorities have been drastically reshaped by a combination of political shifts, successive crises, global instability and a strong focus on economic competitiveness, security and defence. At the same time, a global backlash against human rights, democracy, and gender equality – including within the EU and its traditional partners – has made the promotion of gender equality increasingly politically contested.

This report has identified positive developments produced by GAP III, but also persistent challenges across five key areas.

First, in practice GAP III has not been fully integrated in all areas of EU external action and remains largely confined to the development sector. We found mixed views on the extent to which gender-sensitive or gender-transformative approaches have been embedded in Global Gateway and Team Europe, for example.

Second, there is a persistent shortage of human resources and capacity to implement GAP III. This is compounded by significant variability in expertise and commitment to gender equality within and across EU delegations and at HQ, including awareness, commitment and active

engagement at leadership level. Third, several issues emerged with regard to financial resources, notably the absence of a mechanism to accurately track expenditure on gender equality and the limited allocation of funding to local WROs.

Fourth, political will – both in the EU and in partner countries – remains crucial to the successful implementation of the Gender Action Plan. A perception that gender equality is a low priority in Brussels sends a signal of disengagement, while some partner governments and anti-gender actors have created increasingly challenging environments for EU/international cooperation in this area.

Fifth, considerable accountability gaps persist – particularly in relation to the meaningful engagement of CSOs in actions promoting gender equality and monitoring results and impact.

Despite these implementation challenges, based on our consultations there is strong demand for retaining an action plan similar to GAP III. It has proved a positive framework enabling the EU to step up its support and consolidating its position as a global leader on gender equality. GAP III also created internal awareness, incentives and mechanisms for gender mainstreaming, and encouraged positive change in partner countries.

In this consultation, the question of the political feasibility of a new Gender Action Plan was raised. Political pressure from anti-gender actors, increasing opposition to gender equality policies and the prevailing view that this agenda is at odds with the EU's emerging priorities all threaten EU commitments in this area. GAP III was already

contested by some member states, and ended up being implemented as an internal, non-binding framework. For it to maintain its relevance, a new or updated framework should retain the same level of ambition and the same values. It must also fit with the EU's evolving approach to external action/international partnerships, such as the Global Gateway and Team Europe.

In the context of the dismantling of USAID and the general scaling back of donors' international commitments, consultations conducted for this research also highlighted a strategic opportunity for the EU to step up its engagement by firmly integrating a human rights-based approach across all its external action – trade, investment, diplomacy, security, climate policy and development cooperation.

Against this backdrop, we offer five policy recommendations (see Figure 7 for an overview).

1. Demonstrate the added value of gender equality

EU and global stakeholders must better articulate a compelling political case for gender equality. At a time when gender equality is being increasingly contested, it is more important than ever to demonstrate the tangible impact that gender-sensitive approaches can have on people's lives – both within Europe and globally. Technical arguments alone are not sufficient; progress also depends on commitment at the highest political level. This requires framing gender equality and inclusion in ways that resonate with diverse audiences and help build broader alliances.

Equally important is to make a clear articulation of how gender-sensitive actions can advance broader EU strategic objectives, making investments more impactful and politically feasible. While

maintaining actions addressing GBV, supporting SRHR and defending fundamental values, an additional approach could be to **link gender equality with other emerging priorities at the core of the EU's agenda** – including trade and economic competitiveness, security and defence, democracy, multilateralism, resilience and prosperity. It is essential to demonstrate that these are not mutually exclusive objectives and that gender equality can, in fact, help deliver them.

Another avenue would be to **leverage the added value and distinctive assets that set the EU apart from other major global actors**, such as China. In some contexts, this can mean values, principles and standards, while in others it refers to technical capacity, credibility and consistency (Chen et al., 2023). Our interviews emphasised that partner countries appreciate the fundamental values underpinning EU cooperation and enhancing the EU's credibility and reputation as a stable partner, particularly in a period of unpredictable relationships and changing global alliances. A values-based approach is considered especially pertinent as the US withdraws from its traditional global commitments.

Figure 7 Five policy recommendations

<p>1 Demonstrate the added value of gender equality</p> <p>Build a compelling political case for gender equality</p> <p>Show the tangible benefits of gender-sensitive approaches in Europe and globally</p> <p>Frame gender equality and inclusion in a way that engages diverse audiences and broader alliances</p> <p>Link gender equality with the EU's emerging priorities and strategic objectives</p> <p>Highlight the EU's distinctive leadership and added value that sets it apart from other global players</p>	<p>2 Align emerging EU approaches with gender equality priorities across external action</p> <p>Ensure the next (or updated) GAP responds to the EU's new international partnership frameworks and priorities</p> <p>Establish clear guidelines and requirements to integrate gender equality into Global Gateway and Team Europe</p> <p>Make the GAP a shared responsibility across all Commission services with external-facing policies, beyond DG INTPA and EEAS</p>	<p>3 Maintain gender targets in external financing and strengthen accountability</p> <p>Keep or raise gender targets in the next Global Europe financial instrument</p> <p>Define targets as a percentage of funding – not a percentage of actions – to ensure transparency and traceability</p> <p>Reach the 5% target for gender-principle investments</p> <p>Complement OECD Gender Marker reporting with EU-specific monitoring mechanisms tracing disbursements</p> <p>Earmark a minimum share of funds to cover gender equality objectives in projects marked G1 (gender as a significant objective)</p>	<p>4 Leverage partnerships with Women's Funds to support Women's Rights Organisations</p> <p>Work with Women's Funds to reduce risks and complexity in supporting Women's Rights Organisations (WROs)</p> <p>Recognise the untapped potential of WROs in addressing shrinking civic space and democratic backsliding</p> <p>Expand cooperation with WROs to strengthen the EU's partnerships and resilience in challenging contexts</p>	<p>5 Strengthen implementation capacity</p> <p>Allocate sufficient human resources and training on gender-sensitive approaches, particularly for leadership</p> <p>Prioritise skills development in emerging areas of EU external action, including infrastructure, energy, transport, digitalisation, and private sector engagement</p> <p>Learn from the experience of actors like the EIB and the World Bank, who have developed guidelines around gender-sensitive approaches in areas including public-private partnerships, public transport and investment decisions</p> <p>Give Gender Focal Points a clearer mandate and the capacity to fulfil their tasks</p>
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Source: Authors

2. Align emerging EU approaches with gender equality priorities and apply them comprehensively across external action

Without abandoning long-standing EU commitments to fundamental rights, **the next Gender Action Plan should respond to the EU's new international partnership frameworks and**

priorities. In particular, the new document should set out clear guidelines and requirements for effectively integrating gender into Global Gateway and Team Europe.

The next GAP should be a shared responsibility across all Commission services with external-facing policies and actions – extending beyond

DG INTPA and the EEAS to include DG ENEST, DG ENV, DG DEFIS, DG TRADE, DG ECHO, DG MENA and others. To embed gender equality across all EU external action, the application of GAP should move beyond the current de facto focus on development policy. A stronger coordinating mechanism, ideally located in the EEAS, should be established, alongside a network of gender focal points across relevant DGs. This would enable expertise from diverse thematic areas – security, trade, climate, technology and humanitarian aid – to be integrated into gender-sensitive approaches, and vice-versa.

3. Maintain ambitious gender targets in the new external financing instrument and actually reach them, while improving monitoring and accountability systems

A key finding from our analysis is the positive impact of gender targets in the EU's external action financing instrument (NDICI-GE), in line with the commitments established in the GAP. These targets have helped to increase awareness, commitment and resources to implement GAP III. They created a clear incentive for EU personnel to integrate gender equality across their work. The gender targets helped the EU step up its game, evolve its commitments and consolidate itself as a global gender actor. As such, it would be a huge loss if the EU were to abandon the gender targets, as currently suggested in the Multiannual Financial Framework proposal under negotiation.

It is strongly recommended that gender targets be maintained or strengthened in the next Global Europe financial instrument.

One way to strengthen the targets would be to reduce the ambiguity about what they apply or refer to. The gender targets will be stronger and more transparently traceable if they refer to a

percentage of funding in the new Global Europe instrument, rather than a percentage of actions. The current 85% target has been especially beneficial in driving gender mainstreaming actions, but reaching the 5% target for gender-principal (G2) actions remains a challenge. A higher G2 target would signal the EU's commitment and ambition to advancing gender equality, but actually reaching the existing 5% target may be a more realistic goal.

Targets are an important accountability tool, but they are not the only one. The next Gender Action Plan should consider some **simple, pragmatic steps that could considerably increase the accuracy of monitoring and transparency for tracking progress**. Concrete ideas from this consultation include complementing OECD Gender Marker reporting with EU-specific monitoring mechanisms tracing disbursements related to gender equality, ideally with a distinction between spending on gender-related projects (GBV, SRHR) and support for WROs; earmarking a minimum percentage of funds to be invested in the promotion of gender equality objectives; and covering gender mainstreaming costs in the case of projects marked as G1.

4. Leverage partnerships with Women's Funds to support WROs

The EU has yet to fully utilise the potential of local WROs and other civil society actors. One of the main barriers to directly funding local WROs, as identified in our interviews, is their perceived limited capacity to absorb large-scale funding. Given this constraint, one solution is **closer cooperation with Women's Funds**. These Funds can act as intermediary grant-makers, enabling a cascading model of financing similar to that already employed by some EU delegations through umbrella CSOs or larger INGOs.

Partnering with Women’s Funds offers significant advantages for the EU. It can reduce the risks and administrative burden associated with managing many small grants to local organisations, while ensuring that funding is contextually relevant and channelled to organisations with the greatest potential to drive transformative change. This approach can also help overcome resistance to international donors in some partner countries by fostering more local ownership and political legitimacy, moving away from perceptions of imposing ‘foreign’ or ‘Western’ agendas. Collaboration with Women’s Funds represents a more strategic and effective way of investing EU resources in support of gender equality. In the face of a concerted and well-funded global backlash against rights and democracy, supporting WROs would also send a strong signal of the EU’s commitment to upholding fundamental values and the wider multilateral order.

5. Strengthen implementation capacity

In line with previous evaluations, we highlight the continued need for more human resources and training on gender-sensitive approaches – particularly at leadership level – to ensure effective implementation of the GAP. A new recommendation emerging from our analysis is that **training, skills development and capacity-building should place greater emphasis on integrating gender into emerging areas of EU external action**, such as infrastructure, energy, transport, digitalisation and engagement with the private sector – all of which will take on greater relevance through the EU’s flagship initiatives such as the Global Gateway and Team Europe. As an example, energy is one of the most critical sectors, as it ranks among the lowest in terms of focus on gender equality objectives, second only to the humanitarian sector (OECD, 2023b). As outlined

in our first recommendation, it is crucial that EU staff are able to demonstrate the compatibility of gender equality with these strategic EU priorities. This will mean giving Gender Focal Points **a clearer mandate and corresponding capacity to dedicate to their GFP-related tasks, as well as equipping staff across EU Delegations and HQ with the tools and knowledge to mainstream gender effectively** in their work. Greater commitment is required by senior leadership to institutionalise this approach, including through ongoing professional development, to ensure gender equality is strengthened in all external action, at every level.

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