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**European Commission Public Consultation on  
the next EU Action Plan for Gender Equality and  
Women's Empowerment in the EU External  
Action (GAP IV)  
ActionAid's Input**



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ActionAid is a global federation working for a world free from poverty and injustice. We want to see a just, fair and sustainable world, in which everybody enjoys the right to a life of dignity, and freedom from poverty and oppression. We work closely with people living in poverty and exclusion, civil society organisations, social movements and supporters. Together, we deliver grassroots programmes, provide emergency relief and campaign for women's rights, economic justice and climate justice.

Our work on women's rights is anchored in the objective to support local feminist movements and Women's Rights Organisations (WROs) to become stronger and more successful in their demands for feminist economic alternatives, decent and dignified work and system change to end violence against women.

The EU Gender Action Plan can be a powerful tool in this regard, acting as a steering wheel for the EU external action to deliver both gender targeted actions, gender mainstreaming and policy dialogue. This input reflects ActionAid's key messages and priorities for GAP IV and is the result of consultations with members of the ActionAid Federation who are or have been implementing EU funded projects to promote gender equality and empowerment.

### **Priority #1: strengthening GAP's three-pronged approach and core principles**

A continuation and strengthening of the three-pronged approach and the three core principles of GAP III – a gender transformative, intersectional and rights-based approach – should be a key priority for GAP IV. The **three-pronged approach** guarantees that EU external action systematically integrates the gender dimension in all areas of intervention through **gender mainstreaming**; that specific gender inequality issues are tackled through **targeted actions**; and that several stakeholders, including local civil society and WROs, are engaged through **dialogues** and platforms that can influence policy and programming processes.

As the GAP III intermediate evaluation showed, the three-pronged approach led to enhanced coherence of the implementation of GAP III and an increased perception by several stakeholders of the EU as a credible actor who “walks the talk”. When it comes to policy dialogue, the evaluation shows that CSOs and WROs viewed dialogue with and through the EU as highly valuable, as it strengthened their trust, visibility, and legitimacy, and provided effective platforms to advance gender equality and women's empowerment (GEWE). However, GAP III implementation also showed an asymmetry and inconsistency in the quality and frequency of these dialogues in different countries, where these processes can be untransparent or difficult to access especially for smaller, grassroots organisations. This is mirrored in the experience of the ActionAid Federation, where we see discrepancies in the level of commitment of the EU to carry out inclusive dialogues and consultations with civil society. We overall observe that local feminist and WROs are rarely included, both because gender equality is not always an explicit commitment of the EU in the country (and therefore other stakeholders covering other focus areas like climate, energy,

entrepreneurship are consulted) or due to barriers of accessibility (travel costs, lack of awareness/invitation, language barriers).

It is therefore crucial for GAP IV to address these gaps, and make sure that dialogues are more inclusive, accessible and systematic. Consultations should be carried out both for the drafting of gender country profiles (GCPs) and country-level implementation plans (CLIPs), as well as the monitoring and implementation of GAP IV. Beyond policy dialogues, consultations are also crucial to inform the programming phase, where local CSOs and WROs can be key actors to inform the analysis of local contexts and needs, strategic prioritisation, design of projects, project implementation, monitoring, evaluation and learning – to make sure that the funding provided by the EU is strongly anchored in the local realities and needs.

Such dialogues and consultations are especially relevant in a time where civic space is shrinking globally, and attacks on feminist movements and CSOs are rising alongside a well-funded, global anti-gender movement. EU support can contribute to counter these trends, by fostering safe spaces for exchange and co-creation. These efforts also contribute to strengthen the EU's reputation as a reliable partner, donor and value-based actor.

At the same time, the **three core principles** of **gender transformative, intersectional and rights-based approach** should be strengthened. These principles are key to set a political direction that strives towards system change, eradicate power imbalances linked to patriarchy and other systems of oppression. As also highlighted in the GAP III intermediate evaluation, while intersectionality has been increasingly integrated into CLIPs, implementation remains uneven and only partially translated into practice. To counter this, there is a need to strengthen internal capacity and understanding of the concept, through mandatory trainings of EU Delegations and relevant staff to ensure that these approaches are systematically integrated in the EU's external actions and that their implementation does not rely on the presence of individual champions in EU Delegations. A strengthened intersectional approach would require the EU to more explicitly acknowledge intersecting layers of discrimination (gender, class, race, disability, sexual orientation, migratory status etc) that perpetuate inequalities in societies, by integrating this approach systematically in its programming work, local civil society consultations, and data gathering for monitoring and evaluation. This would translate in interventions that take into account more explicitly rural women, women working in the informal sector, female migrant workers, women with disabilities, LGBTQIA+ individuals and avoid treating "women" as a homogenous group. At the same time, the engagement of men and boys is crucial to promote transformative approaches, challenge patriarchal norms and redistribute power relations. In this sense, intersectionality and transformative objectives are deeply intertwined, as men, boys, gender-diverse individuals and women in all their diversity need all to be engaged to shift patriarchal behaviors and norms. Overall, when it

comes to the gender transformative principle, the GAP III intermediate evaluation<sup>1</sup> shows that progress can be noted in several areas, including the green and digital transition, but implementation is uneven and sometimes superficial. An action is gender transformative when it contributes to shifting gender-power relations, aiming at system change to eradicate discriminations and inequalities: in the current global context, it is crucial that the next GAP intentionally centres transformative approaches, and that these are translated into concrete implementation measures. Indeed, a core challenge for CSOs and WROs – as also shown in the GAP III evaluation – is to conciliate the gender transformative work within the limits of short-term project cycles. To address this challenges, the next GAP could integrate clearer guidelines and indicators for how to achieve gender transformative work within a project lifetime, and make the requirement to align with GAP objective in calls for proposal more explicit; at the same time, the next GAP can also be an opportunity for the EU to present innovative funding models that can respond more adequately to the needs of gender transformative work.

## **Priority #2: inclusion of gender equality spending targets**

Spending targets for gender equality are crucial to make sure that enough resources are allocated both to targeted actions and gender mainstreaming, that partner countries can count on EU long-term, sustained and predictable support in the promotion of GEWE and guarantee increased transparency and accountability of the budget.

Both the GAP III and the NDICI instrument in the current budget cycle include **gender equality targets**. Several analyses have shown that the presence of targets in GAP III and NDICI helped steering EU Delegations engagement on gender equality, by increasing awareness, commitment, resources and incentives to integrate gender equality in their work.<sup>2</sup> The GAP III intermediate evaluation shows the relevance of having targets to drive EU external action, especially in sectors that are predominantly male-dominated and where interventions risk being gender-blind. Targets have also been a useful tool to steer NDICI programming and align it with GAP III requirements.

However, in the European Commission proposal for the next Multi-Annual Financial Framework, most thematic targets have been removed from the Global Europe Instrument in the name of flexibility. This is an extremely concerning development, given the recent cuts to ODA globally, and the severe impact they had especially on

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<sup>1</sup> *Intermediate Evaluation of the implementation of the EU's Gender Action Plan III (2021-2027)*. (December 2025). International Partnerships. [https://international-partnerships.ec.europa.eu/publications-library/intermediate-evaluation-implementation-eus-gender-action-plan-iii-2021-2027\\_en](https://international-partnerships.ec.europa.eu/publications-library/intermediate-evaluation-implementation-eus-gender-action-plan-iii-2021-2027_en)

<sup>2</sup> See: *From GAP III to GAP IV: Rethinking the EU's global support for gender equality*. (2024). In ODI Europe. ODI Europe. <https://odi.org/en/publications/from-gap-iii-to-gap-iv-rethinking-the-eus-global-support-for-gender-equality/> ; *Implementing the EU Gender Action Plan III: Turning ambition into impact?* - CONCORD. (2023, September 22). CONCORD. <https://concordeurope.org/resource/implementing-the-eu-gender-action-plan-iii-turning-ambition-into-impact/>

local actors and WROs. Targets and flexibility are not mutually exclusive: the **G1 target** aims to mainstream gender equality across all areas of EU external policy, thereby allowing for budget allocations to reflect needs and priorities across several sectors, while making sure that these also contribute positively to advance GEWE, rather than reinforcing discrimination and inequality. At the same time, the need to have targeted interventions on GEWE is more pressing than ever, given the rising needs in conflicts and humanitarian crises, the growing anti-gender movement, and systematic attacks on women's rights, including SRHR, globally. For these, a dedicated **target (G2)** is necessary to guarantee adequate funding allocations and focused interventions. NDICI implementation showed that a vast majority of external actions tackling gender equality, did so at the level of mainstreaming (G1) rather than tackling deeper issues of structural inequalities and pursuing long-term, transformative objectives (G2).

For these reasons, ActionAid demands that G1 and G2 targets are included both in the next GAP IV and Global Europe Regulation, to ensure full alignment of the instruments governing EU external action on gender equality, and that the targets are counted **as share of ODA** rather than single actions. Indeed, transforming targets of 'actions' into **spending targets** would bring more clarity in the implementation of the GAP. 'Actions' is a broad term, not clearly defined neither in GAP III nor NDICI and several Delegations shared confusion in how to do the reporting for G1 and G2 actions, as they were not sure what to count.<sup>3</sup> Also, if the target is not explicitly a spending target, it will not give a picture of how much money is actually allocated to GEWE, especially in G1 actions where gender is mainstreamed but does not represent the totality of the intervention. Therefore, ActionAid demands that the next GAP and Global Europe Instrument both include the following spending targets for gender equality:

- **85% of ODA** where gender equality is a significant or principal objective (G1 or G2 OECD marker). Of which:
- **20% of ODA** where gender equality is a principal objective (G2 OECD marker)

Finally, the crucial role of WROs needs to be acknowledged. Local WROs and feminist movements are critical actors to challenge patriarchal norms and gender stereotypes. In contexts of fragility and emergency response particularly, WROs are far more than projects implementers: they act as frontline actors shaping access, protection, and continuity of services. They are closely connected to marginalised groups and local communities, playing a key role in promoting social inclusion, cohesion, protecting rights and strengthening democratic participation. Localized, innovative approaches also contribute to bridging gender gaps in humanitarian settings, particularly in fragile and crisis-affected contexts – building solid bases for post-conflict scenarios, long-lasting peace and resilient and inclusive societies. WROs are also not a homogenous group and represent a plethora of organizations closely

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<sup>3</sup> *From GAP III to GAP IV: Rethinking the EU's global support for gender equality.* (2024). In ODI Europe. ODI Europe. <https://odi.org/en/publications/from-gap-iii-to-gap-iv-rethinking-the-eus-global-support-for-gender-equality/>

connected to specific communities that are subjected to intersecting layers of discriminations, such as women with disabilities, LGBTQI+ individuals, or female migrant workers, and can actively engage men and boys to advance gender transformative work. Yet they remain critically underfunded with less than 1% of ODA globally being directed to them, and have been severely hit by recent aid cuts by major donors, including USAID: UN Women found that one out of three surveyed WROs and CSOs have suspended or shut down programmes aimed at ending gender-based violence, due to aid cuts.<sup>4</sup>The GAP III intermediate evaluation also shows that intersectional and gender-transformative approaches are most often implemented through CSOs or WROs led projects, and lead to results that are more equitable, context-sensitive and sustainable. Therefore, to support this work, a dedicated **spending target of 5% of ODA for WROs** should feature both in the next GAP IV and Global Europe Regulation.

### **Priority #3: making funding accessible for local WROs**

Funding accessibility is another key issue. Despite the key role played by local WROs and grassroots organisations, access to EU funding remains extremely challenging.

Local WROs and feminist grassroots organisations are central in the humanitarian and development response, by providing key services aligned with local needs, being closely linked to the communities and most marginalised groups, conducting advocacy that is closely connected to the reality on the ground, and maintaining their operations even in the most fragile and complex contexts, being present where others leave. Even though their role is often recognised by international actors and donors, **recognition alone is not enough**. Local actors, particularly WROs, remain at the margins of decision-making and receive only a fraction of direct funding. Structural constraints in accessing funding are linked to short-term, compliance-heavy grants, English-only documentation and limited access to decision-making spaces.

The GAP III evaluation also found that a crucial challenge in the support to WROs in fragile and conflict affected contexts was precisely the inaccessibility of funding: short funding cycles, administrative burdens and limited access to core or flexible funding were major obstacles for WROs to be eligible and/or have capacity to apply to EU grants – thereby limiting localisation efforts and transformative gains. In particular, the evaluation finds that *“From 2021 to 2024, support to WROs increased, yet direct funding to national and local actors dropped significantly. Data indicates that direct contracting with NGOs based in developing countries declined significantly over the evaluation period (by 87%), while contracting with international NGOs increased. Overall, the number of interventions implemented by WROs remain a marginal part of the EU portfolio: actions coded under OECD DAC 15170 account for only 7% of all G1*

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<sup>4</sup>Aid cuts shutdown or suspend one in three women's anti-violence programmes (2025) UN Women. <https://news.un.org/en/story/2025/10/1166186#:~:text=with%20her%20guardian.-,Aid%20cuts%20shutdown%20or%20suspend%20one%20in%20three%20women&apos;s%20anti,and%20girls%20will%20only%20rise.%E2%80%9D>

actions, underscoring the limited integration of WROs".<sup>5</sup> While this trend particularly impacts WROs in fragile and conflict affected contexts, inaccessibility of funding for WROs is a widespread issue in other contexts as well.

It is time to match the rhetoric on localisation and leadership of WROs with concrete commitments. Effective ways to do so include:

1. the use of **intermediary actors**, like women's and feminist funds or INGOs that can act as sub-granting cascades and assume the responsibility for compliance and administration
2. **capacity building of local WROs** so that they can compete for funding and implement projects directly. Capacity building would especially be useful in the areas of financial management and sustainability; policy, advocacy and evidence generation to strengthen influence in EU dialogues; digital literacy and security (especially to protect activists in contexts of shrinking civic space) and intersectional program design.
3. Development of **new funding models** that allow for the EU to provide **long-term, core and flexible funding to WROs directly**. This type of funding would allow local WROs to develop institutional resilience, long-term strategy and free themselves from the constraints of "survival fundraising". Successful examples of such models already exist, and the EU can leverage the expertise of Women's Fund and other similar realities to adapt its funding structure to meet the needs of local actors.

### **Women's Humanitarian Leadership Fund (WHLF)**

In Ukraine, ActionAid, Oxfam and 12 WROs launched the **WHLF**: a feminist, locally led financing model that provided flexible, core-style funding with light, transparent administrative and reporting processes.

The WHLF gave WROs the autonomy to act quickly, adapt to shifting realities, and strengthen their organizations from within. The initiative aimed to test a simple but transformative idea: trust WROs to decide how humanitarian resources are best spent to support affected communities. The WHLF was made possible through funding from the Disasters Emergency Committee (DEC).

Flexibility is embedded throughout the model: WROs can allocate funds to their own priorities, shift resources between budget lines, and adjust timelines to respond to changing circumstances. Instead of asking for permission, partners simply notify Oxfam/Action Aid of changes so they can be captured for learning. This positions the WHLF as a mechanism for autonomy and trust, rather than control. Eligibility criteria included meeting the GiHA definition of a WRO, being engaged in some level of humanitarian response, having legal registration in Ukraine, at least one year

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<sup>5</sup> *Intermediate Evaluation of the implementation of the EU's Gender Action Plan III (2021-2027)*. (December 2025). International Partnerships. [https://international-partnerships.ec.europa.eu/publications-library/intermediate-evaluation-implementation-eus-gender-action-plan-iii-2021-2027\\_en](https://international-partnerships.ec.europa.eu/publications-library/intermediate-evaluation-implementation-eus-gender-action-plan-iii-2021-2027_en)

of operational experience, and a demonstrated commitment to humanitarian principles.

For many WROs, the WHLF represented more than financial relief: it provided the conditions to withstand shocks and adapt strategically. Flexible funding enabled WROs to invest in institutional stability during a period marked by donor volatility. For several organizations, WHLF grants provided the only unrestricted funding, allowing them to retain staff, cover core costs, and sustain operations while other projects were suspended or delayed.

The experience also challenged assumptions about which actors are “high-risk.” Many WROs demonstrated robust financial systems, transparent governance, and adaptive planning — reallocating funds or adjusting timelines responsibly when circumstances changed. Flexibility reduced operational risk by allowing timely course correction and responsive decision-making.

At the same time, the experience showed that INGOs can collaborate effectively when they prioritize purpose over profile. Joint implementation also reduced duplication, streamlined learning, and signalled to donors that feminist partnerships are possible across international agencies. Building on this collaboration, Oxfam and ActionAid have since secured funding through the Disaster Emergency Committee's Middle East Appeal to replicate the WHLF model in the Occupied Palestinian Territory.

Read more about the WHLF [here](#).

#### **Priority #4: Global Gateway at the service of GAP IV, not the opposite**

The Global Gateway strategy was launched by the European Commission in 2021 with the aim to mobilize up to €300 billion in investments through large infrastructure projects in the Global South. Global Gateway has faced several criticisms: beyond the figures themselves, the criticisms centre on the approach, which prioritises a self-serving development policy, focusing on EU economic interests in infrastructure projects in Global South countries. This approach has since gained momentum and is now fully embedded in the proposal for the next Global Europe Instrument starting from 2028. Here, EU strategic interests – including on competitiveness, economic security and private sector investments – become predominant over the EU's treaty-based commitment to poverty eradication, sustainable development, gender equality, human rights and democratic governance.

In this context, it is crucial that the **next GAP responds to the scaling-up of Global Gateway, without being swallowed by it**. Otherwise, there is a risk of reducing the promotion of gender equality to a tool to enhance the enabling environment for investments. Instead, Global Gateway projects and the 360-degree approach must put gender equality and equal rights at their core, both as cornerstones for sustainable development and as a prerequisite for the EU's values-based offer to partners. This

can be achieved by including **mandatory gender and inclusive development analysis** in project design, strengthening the **oversight role of civil society**, and including **stronger human rights clauses**, to position gender equality as essential to EU integrity and credibility and not just as an optional “add-on” to investment projects.

Overall, involvement of civil society in Global Gateway remains limited, hindering projects' transformative effects, inclusivity and external oversight. The GAP III evaluation showed that, in global Gateway projects, gender mainstreaming was particularly challenging to achieve in EFSD+ investments and guarantees, and in technically driven interventions in the green and digital sectors. The evaluation finds that *“most Global Gateway Flagship Projects integrated a gender perspective, but several challenges were encountered in infrastructure projects. Interviewees indicated that they found gender mainstreaming more challenging in these types of projects, as private sector actors, in particular promoters/investees under EFSD+ guarantees, did not perceive the opportunity, and/or lacked the capacity to integrate gender equality in their investment plan. Desk analysis also confirmed that blending contracts mainstreamed GEWE less frequently than other types of contracts”*.<sup>6</sup> The evaluation also finds that gender mainstreaming has often been treated as a compliance exercise rather than a driver of change and it was mostly limited to monitoring and reporting, for instance by tracking the participation of women in activities rather than capturing changes in gendered power relations and structural inequalities. Previous analyses have shown that it is possible for European DFIs to better connect with marginalized groups by narrowing the targets of programmes and actively assist financial intermediaries to engage with groups beyond the ‘usual suspects’ – however this was not always pursued and generally absent in EFSD implementation channels.<sup>7</sup>

Ultimately, it is crucial to acknowledge that gender equality can be a driver of inclusive growth and investment opportunities only if women have access to rights and essential services first. **If the playing field is not even to begin with, big investments projects in sectors that are traditionally male dominated only risk further increasing gender inequalities.** This is also echoed in the GAP III evaluation findings on the green transition, which show that a limited number of interventions led to structural shifts in gender norms and women's decision-making power due to persistent structural barriers like land tenure systems, limited access to finance and markets, gender norms and stereotypes, and unpaid care burdens.<sup>8</sup>

Another key concern is the risk that Global Gateway's narrow focus on sectors that attract private investment, would lead to a **de-prioritization of other crucial areas of intervention** that more openly promote gender equality and sustainable

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<sup>6</sup> *Intermediate Evaluation of the implementation of the EU's Gender Action Plan III (2021-2027)*. (n.d.). International Partnerships. [https://international-partnerships.ec.europa.eu/publications-library/intermediate-evaluation-implementation-eus-gender-action-plan-iii-2021-2027\\_en](https://international-partnerships.ec.europa.eu/publications-library/intermediate-evaluation-implementation-eus-gender-action-plan-iii-2021-2027_en)

<sup>7</sup> PÉREZ, A., ALBHAKIT, N., & RUIZ, B. (2023). *The implementation of EFSD+ operations from an inclusive perspective* (By European Parliament).

[https://www.europarl.europa.eu/RegData/etudes/STUD/2023/702595/EXPO\\_STUD\(2023\)702595\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2023/702595/EXPO_STUD(2023)702595_EN.pdf)

<sup>8</sup> Ibid.

development, such as GBV and SRHR. This is reflected in the ActionAid Federation experience, in particular in countries that are considered priorities for Global Gateway like West Africa.<sup>9</sup> In these contexts, the perception is that gender equality no longer represents a standalone priority for the EU, whose interest centres around tech and digitalisation, climate, promoting youth entrepreneurship, migration and border governance – while the support to feminist issues and WROs is left in the background.

Therefore, it is crucial that the GAP three-pronged approach is strictly applied to Global Gateway by:

- Strengthening gender mainstreaming through:
  - mandatory gender analysis in the design and evaluation of investments projects
  - capacity building for project managers and implementing partners to take into account the gender dimension of actions supported and avoid the reproduction of inequalities
  - stronger gender equality and human rights safeguards
- Policy and programming dialogues that guarantee a stronger role for civil society in Global Gateway to act as watchdog and ensure programming that is inclusive, sensitive to local context, and does not reproduce social and gender inequalities

At the same time, gender mainstreaming of Global Gateway should not replace gender targeted actions and grant funding to promote gender equality in GAP IV. That is why GAP IV should **maintain the thematic priorities** included in GAP III: **gender-based violence, sexual and reproductive health and rights, economic and social rights and empowerment, equal participation and leadership, women, peace and security** and **green and digital transition**.

Ultimately, the link between GAP IV and Global Gateway should be based on the premise that **GAP IV is an instrument that can hold Global Gateway accountable**, through monitoring mechanisms and ensuring compliance with pre-existing EU obligations on gender equality and fundamental rights.

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<sup>9</sup> Commissioners Sikela and Brunner recently visited Senegal to deepen strategic cooperation on Global Gateway and border management: [https://home-affairs.ec.europa.eu/news/commissioners-sikela-and-brunner-visit-senegal-deepen-strategic-cooperation-2026-03-04\\_en](https://home-affairs.ec.europa.eu/news/commissioners-sikela-and-brunner-visit-senegal-deepen-strategic-cooperation-2026-03-04_en)