

CONCORD

European Confederation of NGOs working on
sustainable development and international cooperation

CONCORD's Position Paper on GAP IV



ABOUT CONCORD

CONCORD is the European Confederation of NGOs working on sustainable development and international cooperation. We are made up of 58 member organisations representing more than 2600 NGOs and are supported by millions of citizens across Europe.

We are the main interlocutor with the EU institutions on sustainable development policy and international cooperation. We are a member-led organisation which means that the members give the strategic direction of the Confederation.

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INTRODUCTION

CONCORD is the European **Confederation** of NGOs working on sustainable development and international cooperation and its expertise lies in EU external policies, including on gender equality. In this paper, CONCORD outlines its key recommendations for a Gender Action Plan IV (GAP IV).

Gender equality is both a fundamental EU value, as laid down in the Treaties, and an essential component of effective and equitable international cooperation. It is not only right that the EU amplifies women's, girls' and marginalised communities' agencies and power; it is also critical to achieve peaceful, stable and prosperous societies, which are beneficial to everyone. Gender stereotypes and restrictive gendered social norms directly affect individuals' rights, choices, freedoms and capabilities. They limit people's potential to thrive in school, at work and in their personal and family life and prevent women, girls, marginalised and underrepresented groups from participating in the economic, political and social lives of their countries. Gender equality is also an integral part of achieving Agenda 2030 through contributing to the achievement of SDG 5 on gender equality, which in turn contributes to advancing other SDGs on eradicating poverty, improving health, reducing inequalities, achieving peace, etc.

We commend the European Union's efforts to support gender equality in its external action, especially through the Gender Action Plan III (GAP III). As exemplified by **CONCORD's own assessment of the GAP III implementation**, GAP III has an enormous potential to advance gender equality. When present, EU high-level leadership on gender equality and active collaboration with local women's and feminist movements have been seen as really moving the needle on gender equality, including at partner country level. We consider GAP III as an excellent tool to achieve gender equality and we recommend that GAP IV continues on this solid basis, while focusing even more on implementation, strengthening collaboration with local feminist movements and women's rights organisations, and embracing feminist principles explicitly. On this matter and based on **CONCORD's paper on 10 feminist principles**, we believe that GAP IV must continue to be based on the principles of an intersectional, gender-transformative and human rights-based approach, while being more explicitly a tool to pursue systemic change, correct power imbalances and counter colonial continuities.



WHAT TYPE OF DOCUMENT DO WE WANT GAP IV TO BE?

We recommend that the GAP IV be a policy document that reaffirms the EU's ambition on tackling inequalities, building on the progress and achievements of GAP III. There is strong support from actors implementing GAP III activities for retaining a document similar to GAP III for its next iteration¹. To ensure sufficient resources to deliver a GAP IV as well as cohesion across all of the EU's foreign and security policies, GAP IV financial commitments should also be reflected in the EU's next Multiannual Financial Framework (MFF).

Strong political support in the form of the following would strengthen the effectiveness of this tool:

- **GAP IV being a Joint Communication**, as was the case for **GAP III**, which provided a clear and strategic vision for the EU's external action on

gender equality and women's empowerment. This format requires inter-institutional dialogues and sends a strong message to all relevant stakeholders that the Union as a whole commits to gender equality, giving the strategy greater political weight and visibility.

- The **formal endorsement of GAP IV by Member States through Council Conclusions**: Member States should commit to the full implementation of GAP IV in their external action, so as to ensure shared political ownership and full alignment and implementation across the EU and its Member States. In their Council Conclusions, Member States should also commit to report more systematically on their actions contributing to GAP IV to ensure alignment, high quality reporting and accountability.

WHAT DO WE WANT TO SEE IN GAP IV?

Strong political will

GAP III successes partly come from strong political will from the highest level in the European Commission, and a firm commitment to put forward and implement an ambitious agenda. To pursue in this direction, the same level of ambition and commitment from the highest levels must underpin GAP IV adoption. This should be done through:

- **Recommitment to the institutional cultural shift and leading-by-example approach, building on the progress made in GAP III**. This should translate into:
 - Ambitious efforts to **increase the representation of women in senior leadership roles**, including EU Ambassadors,

Heads of Delegation, and decision-making posts across EU external action structures.

- **Involvement and commitment of high-level management** at EU headquarters (in the EEAS and all relevant DGs, and not only in DG INTPA), EU Delegations, and Member State Embassies to gender equality, for example by replicating the Gender Champion rotation practice in the Philippines.²
- **Adequate financial and human resources to EU Delegations' Gender Focal Points** so that promoting gender equality in EU external action at the country level is a priority rather than an add-on. Allocation of time should be transparent and reflected in their job description, with opportunities

¹ p.37, ODI Europe (2025) *From GAP III to GAP IV: Rethinking the EU's global support for gender equality*

² See CONCORD (2023) *Implementing the EU Gender Action Plan III: Turning ambition into impact?*

for visibility and capacity sharing with other EU Delegations. Decision-making power, reporting and accountability lines need to be clear and included in their job description.

- **Investment in in-house expertise** of all EU Delegations staff in particular through regular **training**. Training should not be limited to gender focal points or dedicated teams; all staff, across all levels and functions, must receive training and develop a working

understanding of gender equality, especially on women's rights international frameworks, gender analysis, the core principles of GAP IV (gender-transformative, human rights-based and intersectional approach) and gender mainstreaming. A broad-based, informed understanding of gender across the EU's external action will help ensure that commitments are not isolated but fully integrated into policy, programming, and diplomacy.

CONTINUATION OF THE THREE-PRONGED APPROACH BASED ON THE THREE PRINCIPLES OF GAP III

The approach of the EU's GAP IV must build on the solid foundations laid in GAP III by:

- **Reinforcing the three-pronged approach:** targeted actions, gender mainstreaming, and political and policy dialogue. Gender-targeted actions are especially critical to achieving gender equality and more funding must be allocated to them (see our recommendation on funding).
- **Reaffirming in GAP IV the three key principles of GAP III:** a gender-transformative, intersectional and rights-based approach that must be applied not just in theory, but also in practice through:
 - **Applying consistently inclusive and non-binary language** across the entire strategy, particularly strengthening the sections on sexual and reproductive health and rights (SRHR), participation, and leadership.
 - **Implementing an intersectional approach by:**
 - Providing structured training to EU Delegation staff on the concept and practice of intersectionality;
 - Ensuring regular, early, and meaningful **consultation with diverse women's rights organisations and feminist movements,**
- **Adopting a gender-transformative approach** that addresses the root causes of gender inequality and rebalances power relations, with a clear commitment to systemic change as the foundation of all EU external action.
- **Ensuring that all EU external policies respond to the GAP IV objectives.** Applying gender equality objectives across EU external policies has been strengthened in GAP III but more remains to be done to ensure a *Whole of Government Approach* that guarantees coherence and consistency across sectors such as humanitarian, development, trade, climate, security, digital, taxation, and macro-economic policies. In GAP IV, in addition to the continued focus on the thematic issues included in GAP III, particular focus should be given to:
 - **Taxation and Domestic Resource Mobilisation (DRM):** GAP IV should recognise the impact of tax justice on funding gender equality and mainstream gender in taxation and domestic resource mobilisation;

particularly those representing marginalised communities, and including those outside of capitals and ensuring resources to cover the costs of this.

- **Trade:** Gender equality must be systematically mainstreamed, with mandatory gender impact assessments of trade agreements;
- **Corporate Accountability:** The EU must move beyond voluntary guidelines and ensure binding regulations for and accountability of companies that violate the rights of women and girls;
- **Macro-economic policies:** GAP IV should address the gendered impact of austerity, fiscal orthodoxy, and conditionalities, and advocate for gender-responsive budgeting globally.

PURSUE STRONG FOCUS ON IMPLEMENTATION

GAP III has a strong focus on implementation and we recommend that GAP IV keeps this focus through:

- **Retaining the requirement for EU Delegations to update their gender country profiles (GCPs) and to design an updated Country-Level Implementation Plan (CLIP),** based on the gender analysis and robust and inclusive consultation with local civil society organisations.
- **Keeping the thematic priorities included in GAP III:** freedom from all forms of gender-based violence (GBV), promotion of SRHR, respect of economic and social rights, including access education and health, equal participation and leadership, the Women, Peace and Security (WPS) agenda, and gender equality in the digital and green transition are all important priorities for the EU to continue working on. We commend the progress already made in advancing these thematic areas, particularly in strengthening economic and social rights and empowering girls and women. We also particularly welcome the inclusion of unpaid care work as well as agriculture, food, land, and natural resource rights in GAP III. These topics should be kept, as part of the priorities listed above, in GAP IV.

Improvements could be made in the thematic focuses, namely:

- **Online GBV should be better included,** either in the GBV section or the digital transition section, as this is a major barrier to women's and girls' access to, and engagement in, digital spaces.
- The pillar on **green transition should be better linked with the European Green Deal to ensure strong synergies and policy cohesion between EU internal climate policies and GAP IV focus on green transition.** It should also include an explicit recognition of the important work of women environmental defenders, as well support and protection mechanisms when needed.
- The **WPS agenda** should go beyond participation targets and commit to addressing the structural barriers that prevent women's meaningful engagement in peace and security. The link between SRHR and WPS should be strengthened, recognising that access to sexual and reproductive health services, including the Minimum Initial Service Package (MISP), is critical for women's safety, dignity, and agency in conflict and crisis settings.
- **Strengthening engagement with local women's rights organisations and feminist movements.** Although GAP III has provided more opportunities for local women's rights

organisations and feminist movements to engage, [CONCORD's evaluation of the GAP III implementation](#) called for more to be done:

- **Monitor, promote and protect civic space and fundamental rights** (freedom of assembly, association and expression) online and offline, ensure that civil society is free from all forms of repression, and explore how existing tools such as the CSO roadmaps or the human rights dialogues can contribute to strengthening an enabling environment for vibrant feminist movements working at the intersection of inequalities.
- **Proactively engage with representatives of marginalised groups**, ensuring that they not only have a seat at the table but also have meaningful influence over outcomes and can actually shape the policies that affect them. By actively engaging with marginalised communities, policymakers can better understand their unique challenges, perspectives and needs, and thus prepare more effective and equitable policies. In doing so, it is important to reach out beyond

the “usual suspects” to CSOs that do not usually receive EU funding and to engage with a wide variety of CSOs and WROs, including local CSOs, WROs and CSOs outside of capitals, organisations representing people experiencing intersectional discrimination. This requires a comprehensive mapping of organisations and their gender expertise across sectors, as well as proper financial resources to support the participation of a variety of civil society actors.

- **Engage CSOs and local WROs in all their diversity beyond CLIPs consultation throughout all stages of the GAP IV implementation and monitoring cycle:** context analysis, strategic prioritisation, design of projects, project implementation, monitoring, evaluation and learning. Regular exchanges on gender equality and the implementation of GAP IV to discuss progress should be organised by EU Delegations. The “sounding board” set up by the EU Delegation in the Philippines as part of GAP III implementation is an example of a best practice to replicate in different countries.

ENSURE ADEQUATE FINANCIAL RESOURCES FOR GAP IV IMPLEMENTATION

Prioritising funding to gender equality, to match commitments and resources, is crucial to ensuring that GAP IV can actually be implemented. The inclusion of gender and gender mainstreaming in the current MFF and of the gender targets within the NDICI-GE financial instrument have been critical to the success of GAP III implementation³. To see this continued success, we call on the European Commission to include in GAP IV:

- **A commitment to adopting a gender-responsive and disability-inclusive approach to budgeting** and integrating intersectional analysis into all budget planning and allocation processes. This involves conducting rights and

gender impact assessments and identifying gender equality objectives for each budget category.

- **An alignment of GAP IV with the MFF programming process of the next international cooperation instrument (Global Europe Instrument).** The experience of adopting GAP III right before the NDICI programming process has shown that it supported EU Delegations in embedding a gender-transformative approach into the long-term budget by allocating funding to gender equality in their multiannual indicative programmes (MIPs). This good practice must therefore be replicated.

³ p.14, ODI Europe (2025) *From GAP III to GAP IV: Rethinking the EU's global support for gender equality*

- **A renewed commitment to the OECD gender markers and strengthened benchmarks for gender equality** by changing their measurement from number of actions to level of ODA: 85% of all EU ODA should therefore be dedicated to programmes that have gender equality as one of their objectives (OECD marker G1 or G2) with 20% of ODA dedicated to gender-targeted projects (OECD marker G2). This shift would ensure a stronger, more impactful commitment to advancing gender equality through focused and adequately resourced initiatives and would be supported by actors already working on implementing GAP III activities⁴. These targets should also be reflected in the implementation of the EU budget by other European Financial Institutions, such as the EIB or the ERBD. Likewise when EU public financing is leveraged, EU's standards and commitments must be respected by all intermediaries involved.
- **A dedicated target of at least 5% of ODA to support Women's Rights Organisations**

(WROs). Local WROs and feminist movements are critical actors to change harmful gender and social norms, protect rights and uphold democracy, achieve gender equality and sustainable development. Yet they remain critically underfunded with less than 1% of ODA globally being directed to them.

- **A commitment to work hand in hand with partner countries to scale up efforts for domestic resources mobilisation (DRM)** - which is the only sustainable way for partner countries to fund women's rights in the long term. There was no reference in GAP III to DRM or to the need to scale up efforts to **address illicit financial flows and tax avoidance** by large companies, including European companies, which adversely impact the capacity of developing countries to invest in gender-responsive public services. This blind spot should therefore be addressed in GAP IV to ensure fair redistribution and sustainable funding to gender equality and women's rights.

MONITORING AND REPORTING

We have noticed significant improvements in monitoring and evaluation in GAP III. The adoption of a set of clear indicators in GAP III, their inclusion in the EU Development and Cooperation Results Framework and the release of two interim evaluations are all contributing to better monitoring and evaluation. To build on this strong basis, we recommend that in GAP IV, the European Commission:

- **Invest even more in collecting disaggregated data and in supporting partner countries in doing so**, in order to know whether the results of interventions are having a positive impact on those furthest behind. In line with SDG target 17.18, data should be disaggregated by income, gender, age, race, ethnicity, migratory status, disability and geographic location.
- **Give specific guidance to EU Delegations and HQ staff in properly using and reporting on**

GAP indicators and OECD Gender markers.

We continue to see discrepancies in the way reporting is done on OECD Gender markers, with programmes being marked G1 while not really having gender equality as one of their objectives.

- **Continue to include both quantitative indicators and qualitative indicators such as inclusive monitoring and evaluation.** This implies not just measuring the number of people that participate in an activity, but also evaluating the transformative potential/ impact of that activity (e.g. in terms of changing mindsets related to gender roles).
- **Include in GAP IV a requirement for all external policies** (including economic policies, investments, trade, etc.) **to report on their impact on gender equality.**

⁴ p.14-15, *Ibid.*

CONCLUDING REMARKS

In conclusion, GAP IV should not only sustain but strengthen the momentum built under GAP III. GAP IV presents a crucial opportunity for the EU to reaffirm and strengthen its commitment to gender equality as a core value and strategic priority in its external action. To do so, it should focus even more on implementation, deepen partnerships with women's rights organisations (WROs), and explicitly embrace feminist principles, while ensuring adequate resources and capacity to deliver and implement.



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