



A Strategy for Implementation: WAVE's Analysis of the EU Gender Equality Strategy 2026–2030

April 2026

Introduction

WAVE's statement on the Gender Equality Strategy 2026–2030 sets out our overall assessment of the Strategy and the structural concerns that will shape our engagement with its implementation. This document takes that assessment further, examining each of the eight principles of the Roadmap for Women's Rights and identifying, principle by principle, what WAVE welcomes, where the Strategy falls short, and what we call on the Commission to do during the implementation period.

The analysis is grounded in WAVE's sustained engagement with EU policy on violence against women and in the daily work of our 1,800 member organisations across 46 countries — the shelters, helplines, women's centres, and specialist services that support women survivors of domestic violence, sexual violence, technology-facilitated violence, harmful practices, and the forms of discrimination that compound each of these. It is measured against the standards of the Istanbul Convention, which remains the most comprehensive international framework on violence against women, and to which the EU has been bound since its 2023 accession.

Key WAVE positions at a glance

- ▶ Implementation must be rigorous, not procedural. Soft instruments alone will not deliver the Strategy's ambition.
- ▶ The Istanbul Convention must function as a living accountability framework, with EU-level action on the gaps GREVIO identifies.
- ▶ Women and girls must remain the primary subjects, named by the Strategy, with disaggregated data consistently foregrounded.
- ▶ Women's specialist services must be structurally integrated into implementation monitoring and sustainably funded.
- ▶ Intersectionality requires a legal definition and concrete measures, not only a horizontal reference.

Principle 1: Freedom from gender-based violence — the right to security and dignity

WAVE position: *This is the area of greatest concern to WAVE, and where the gap between the Strategy's diagnosis and its proposed actions is most visible; implementation of the VAW Directive and technology-facilitated violence measures matter, but they cannot substitute for action on prevention, femicide, harmful practices, women's specialist services, the harmonised criminalisation of rape on the basis of consent, and the specific situation of women with disabilities.*

The GES 2026–2030 opens Principle 1 with data that accurately reflects the reality our members face daily: one in three women in the EU has experienced gender-based violence in their lifetime; femicide claims the lives of 18 women per week. These figures are the daily caseload of WAVE's member organisations, and we welcome their inclusion in the Strategy's framing.

We welcome the Commission's commitment to support Member States in transposing the Directive (EU) 2024/1385 on Violence Against Women by the June 2027 deadline, and its undertaking to follow up on the 2026 GREVIO baseline evaluation on the EU accession to the Istanbul Convention, and implement subsequent recommendations. Tying the Strategy's VAW commitments explicitly to the Convention's monitoring process is the right approach. It is also an urgent one: [WAVE's shadow report to GREVIO](#) identified systemic gaps in how EU institutions are meeting their obligations on prevention, data collection, and the treatment of women in the most marginalised situations. One of those gaps is the continuing absence of a consent-based definition of rape across the EU, a standard the Istanbul Convention itself establishes in Article 36, and one the VAW Directive failed to deliver in its adopted text.

WAVE acknowledges the Commission's commitment to update its mapping of the legal landscape on rape legislation in the EU and to support national reforms introducing consent-based definitions. This is a useful step, **but mapping without legislative follow-through will not close the gap**. In the absence of binding harmonisation at EU level, progress will remain uneven across Member States, **and women who experience rape will continue to face radically different prospects of recognition and justice** depending on where they live. WAVE reiterates its call for the Commission to bring forward a legislative proposal on the harmonised criminalisation of rape based on lack of consent, aligned with the European Parliament's position (2025/2040(INI)) and with the Istanbul Convention standard. The Commission's longer-term work on adding violence against women to the list of Eurocrimes under Article 83(1) TFEU should continue in parallel.

We welcome, too, the Strategy's engagement with technology-facilitated violence against women, including the commitment to enforce the Digital Services Act against very large online platforms, to support trusted flaggers, and to address the specific harms caused by non-consensual intimate imagery and AI-generated deepfakes. Online violence is not a separate category from offline violence; it is another dimension of the same patriarchal violence our members see in their services every day, and it demands a serious, sustained response. For survivors, the gap between reporting non-consensual intimate imagery or AI-generated abuse and its actual removal can stretch into days or weeks, by which time the harm has multiplied across platforms. The forthcoming guidelines on trusted flaggers must close that gap, with concrete timeframes for takedown and clear accountability where platforms fail to meet them — not only sustained dialogue.

Against these welcome commitments, however, the GES 2026–2030 leaves gaps across the continuum of violence against women. The first gap concerns prevention beyond law enforcement. The Strategy references the Network for the Prevention of Gender-Based and Domestic Violence as a mechanism for sharing best practices among Member States, and WAVE welcomes the network’s existence. However, it is principally a dialogue space between Member State representatives, with limited and unstructured participation from civil society organisations and specialist services, and it does not currently translate into binding recommendations or measurable resourcing for prevention work at the national level. Comprehensive prevention, as required by the Istanbul Convention, goes significantly beyond law enforcement capacity-building. It requires community-level work, long-term behavioural change approaches, educational engagement with young people, and the sustained involvement of those organisations with frontline expertise. The Strategy does not articulate how this will be achieved, nor does it strengthen civil society’s role in the prevention architecture.

A related gap concerns femicide. While the Strategy names femicide in its diagnostic framing, it does not commit to any dedicated action, such as a legislative mapping or a harmonised data collection framework that would allow the EU to systematically track and respond to this most extreme form of violence against women. The Commission’s commitment to support administrative data collection with EIGE is welcome but falls short of an EU-wide approach to femicide prevention and documentation that the scale of the problem demands.

WAVE also notes with concern the unfinished commitment on harmful practices. The Recommendation on preventing and combating harmful practices against women and girls, a commitment made in the 2020–2025 GES, for which a consultation process was launched in May 2022, has neither been adopted nor carried forward in this new Strategy. The Commission has not explained the discontinuation of this process, which involved expert organisations and built significant institutional knowledge. Harmful practices, including female genital mutilation, forced sterilisation, forced marriage, and obstetric violence, continue to affect women and girls in the EU and in countries seeking accession, and their absence from both the Roadmap for Women’s Rights and the GES 2026–2030 is a gap WAVE urges the Commission to address during the implementation period.

A further structural gap concerns specialist services. The Strategy does not explicitly commit to monitoring or ensuring the adequacy of women’s specialist service provision against Istanbul Convention standards. GREVIO’s evaluations consistently document underfunding and underprovision of these services across EU Member States, and without EU-level attention, this gap will continue to widen.

Women with disabilities are a further and related concern. They experience disproportionate rates of violence against women and face specific barriers that are rarely designed with their needs in mind. The new GES does not actively include women with disabilities in its violence against women commitments, and this gap must be addressed in implementation, in coordination with the EU Disability Rights Strategy and with the respective civil society organisations.

Finally, on the universality of the Istanbul Convention, we welcome the Commission’s reiterated call on all Member States to ratify and fully implement it. WAVE stresses, however, that the Commission should go further and publicly name the situation of those Member States that have yet to do so, including Latvia’s recent move towards withdrawal, which represents a direct threat to the Convention’s standing within the EU.

WAVE calls on the Commission to:

- Bring forward a legislative proposal on the harmonised criminalisation of rape based on lack of consent, aligned with the European Parliament’s position (2025/2040(INI)) and the Istanbul Convention standard, and maintain the longer-term trajectory towards adding violence against women to the list of Eurocrimes under Article 83(1) TFEU.
- Connect VAW Directive transposition monitoring with Istanbul Convention service requirements, and use AgoraEU (CERV and Daphne) funding to actively close identified gaps in specialist service provision.
- Develop a dedicated EU framework on femicide prevention and harmonised data collection.
- Reopen and complete the process on the Recommendation on preventing and combating harmful practices against women and girls.
- Actively include women with disabilities in the implementation of violence against women commitments, in coordination with the EU Disability Rights Strategy and with disabled women’s organisations.
- Embed structured civil society participation, including WAVE and its members, into the Network for the Prevention of Gender-Based and Domestic Violence.
- Publicly name and address the situation of Member States that have not ratified, or are moving to withdraw from, the Istanbul Convention.

Principle 2: The highest standards of physical and mental health

WAVE position: *Women’s health is a rights issue, not a productivity calculation, and the Strategy’s health architecture cannot be complete while the intersection between violence against women and health systems remains absent.*

Health appears in the GES 2026–2030 not as a sub-theme within employment or violence, as in the previous Strategy, but as a principle in its own right. WAVE has called for this recognition, and its inclusion is a structural step forward. We therefore agree with the Strategy’s diagnosis of the barriers women face in accessing healthcare, including the specific challenges facing racialised women, migrant women, Roma women, women with disabilities, and women in rural areas. We welcome the commitment to launch a new initiative with the World Health Organisation on women’s health, to expand women’s participation in clinical trials, and to develop a framework for data collection on sexual and reproductive health and rights.

We particularly welcome the Commission’s response to the *My Voice, My Choice European Citizens’ Initiative*, acknowledging unsafe abortion as a public health matter and signalling that Member States may use the European Social Fund Plus (ESF+) to improve equal access to legally available abortion services. This is the right approach; however, reallocation depends on national political will and a formal programme amendment, the very conditions that are missing in the Member States where abortion access is most restricted. Women in those Member States, therefore, remain dependent on whether other governments choose to act, and this matters acutely for the women whom restrictive national laws affect most directly.

WAVE notes that the Strategy's framing of the economic benefits of closing the women's health gap, while legitimate, risks reducing women's health to a productivity calculation. Gender equality in health is a matter of human rights and of the intrinsic value of women's lives. A case in point is the mention of women's mental health with no identified actions, despite strong evidence of the mental and psychological impact of domestic violence, as well as of uneven care responsibilities.

This intersection, including the role of healthcare providers in identifying and referring women experiencing violence, is absent from the Strategy and represents a significant missed opportunity. The Strategy similarly fails to address the range of institutional and medical contexts in which women experience harm: obstetric violence, recognised in the stakeholder consultation as a form of institutional violence requiring mandatory professional training, is one example. More broadly, healthcare settings are a critical point of contact for survivors of gender-based violence. WAVE, in collaboration with the WHO, has developed [guidelines for healthcare providers](#) on responding to the needs of victims of sexual violence, identifying the key role that providers can play in supporting survivors and facilitating access to appropriate services; expertise that the Commission's implementation work should draw on.

WAVE calls on the Commission to:

- Ensure the WHO women's on health initiative draws on existing tools, including the WAVE-WHO guidelines for health providers to respond to the health needs of women and girls who experience VAW, and that member states adopt them, in close cooperation with WSS.
- Translate the stated mental health objective into concrete actions that explicitly recognise the VAW - mental and psychological health link.
- Address obstetric violence explicitly during the Strategy's implementation period, including through professional training standards.
- Accompany the ESF+ signalling on abortion access with clear guidance to Member States, so that access to legally available services does not remain contingent on national political will alone.

Principle 3: Equal pay, economic empowerment and financial independence

WAVE position: *Economic security is foundational to women's safety; a strategy that does not name migrant and undocumented women in its economic empowerment commitments, and does not engage with the gendered impacts of the Pact on Migration, cannot claim to protect the women most exposed to violence against women and exploitation.*

WAVE broadly welcomes the Strategy's commitments under Principle 3, including the focus on implementing the Pay Transparency Directive, closing the gender investment gap, addressing the pension gap, and integrating a gender perspective in the Anti-Poverty Strategy and the European Affordable Housing Plan. These are substantive commitments, and the proposed Council Recommendation on housing inequality with an intersectional approach is a positive development.

The intersectional dimension of economic inequality is nonetheless insufficiently developed, and this has direct implications for WAVE's work. **Migrant women, undocumented women, and racialised women are disproportionately represented in the informal care economy, in low-paid and precarious work, and among those most at risk of poverty,** and economic dependence is one of the

most consistent drivers of women's vulnerability to and entrapment in violence. The structural conditions that prevent these women from accessing equal pay protections, equal opportunities, and economic independence merit explicit recognition and targeted action, not only a horizontal reference to intersectionality.

These concerns cannot be separated from the wider EU policy environment affecting migrant and refugee women. The implementation of the Pact on Migration and Asylum, and in particular the new Return Regulation, has direct consequences for women's economic security and safety: precarious legal status is not only a migration-policy issue but a risk factor for violence against women, because it limits access to labour protections, to women's specialist services, and to reporting mechanisms for those who experience violence. WAVE calls on the Commission to ensure that the gendered impacts of the Pact on Migration are actively addressed within the implementation of the Gender Equality Strategy.

On the gender pension gap, the Strategy acknowledges the problem but does not commit to structural reforms. There are no pathways towards an equal-earner–equal-carer model as proposed in the stakeholder consultation, and no engagement with the deeper question of how pension systems continue to penalise women who have carried the weight of unpaid care across their lifetimes. For many older women supported by WAVE's members, including survivors returning to independent life after decades in coercive relationships, this gap is not abstract. It determines whether leaving an abusive relationship is economically survivable, and whether women face violence and poverty in old age. This is a reality WAVE knows well: through the [MARVOW Project](#), developed with five partner organisations, WAVE worked to improve support for older women survivors of violence through multi-agency cooperation, and the findings speak directly to the structural economic vulnerabilities the Strategy leaves unaddressed.

WAVE calls on the Commission to:

- Ensure all implementation of Principle 3, including Pay Transparency Directive enforcement, explicitly addresses the situation of migrant, undocumented, and racialised women.
- Actively address the gendered impacts of the Pact on Migration and the Return Regulation within the Gender Equality Strategy's implementation.
- Develop pathways towards an equal-earner–equal-carer model, and a coherent pension model for women

Principle 4: Work-life balance and gender equality in care

WAVE position: *Domestic workers, overwhelmingly women, often migrant and racialised, structurally exposed to violence against women need more than repeated calls for ILO Convention 189 ratification; they need a concrete EU response within the Commission's own competence.*

WAVE shares the Strategy's diagnosis of the unequal distribution of care responsibilities as a structural driver of women's economic disadvantage. We welcome the commitment to publish a report on the Work-Life Balance Directive's implementation, the Barcelona targets follow-up, and the forthcoming European Care Deal in 2027.

We draw particular attention to the situation of domestic workers, a predominantly female and often racialised migrant workforce structurally excluded from labour protections in many Member States. The Strategy urges Member States to ratify ILO Convention 189 on decent work for domestic workers. WAVE notes that similar calls have been made for years without adequate results, including the longstanding call for universal Istanbul Convention ratification. Given that domestic workers frequently live in the households of their employers and face acute risks of exploitation and violence against women, the Commission must move beyond calls to action and consider what monitoring, reporting, and support mechanisms can be put in place within its own competence.

WAVE calls on the Commission to:

- Engage actively with ILO Convention 189 as a guiding framework and pursue EU accession to it.

Principle 5: Equal employment opportunities and adequate working conditions

WAVE position: *The Commission has the evidence and the competence to act decisively on sexual harassment and gender-based violence at work; a strategy that “considers” action, and footnotes ILO Convention 190, is not yet commensurate with the scale of the problem.*

WAVE welcomes the Strategy’s recognition that one in three women in the EU have experienced sexual harassment at work, and that this figure rises to 41.6% among women aged 18–29. This is one of the most prevalent forms of violence affecting women across Europe and has direct relevance to our members’ work with survivors.

However, the Strategy’s proposal to consider action on sexual harassment in the workplace in the framework of the Quality Jobs Act, and to reference it in the future Strategic Framework on Health and Safety at Work, falls significantly short of the scale of the problem. This gap was clearly identified in the stakeholder consultation, where trade unions unanimously called for a directive on the prevention and eradication of GBV and harassment in the world of work. The VAW Directive did not cover sexual harassment at work in its final adopted text.

We are particularly concerned that **ILO Convention 190 — the only international instrument specifically addressing violence and harassment in the world of work** is not assumed as a guiding framework for the GES, and there is no active promotion of its ratification, which remains incomplete across most EU Member States. Given the direct relevance of Convention 190 to both employers’ responsibilities and to third-party violence (including against frontline workers, many of them in our members’ organisations), its marginal treatment is a significant shortcoming.

WAVE calls on the Commission to:

- Elevate ILO Convention 190 to a guiding framework and actively promote its ratification across EU Member States.

Principle 6: High-quality and inclusive education and training

WAVE position: *Schools are one of the most powerful spaces available to prevent gender-based violence and to counter the misogynistic narratives increasingly reaching young men and boys*

online. The Strategy recognises both, but does not yet treat education as a primary site of VAW prevention.

WAVE supports the Strategy's commitments to high-quality and inclusive education, including gender-sensitive curricula, the Girls Go STEM initiative, and the Boys in HEAL approach. Dismantling the occupational segregation that perpetuates economic inequality between women and men begins in educational settings, and targeted initiatives that open pathways for both girls and boys are important and warranted.

We consider it, however, a significant missed opportunity that education is not addressed as a primary site of VAW prevention. Schools and educational settings are places where gender norms are formed and where the patterns that lead to violence, harassment, and coercive behaviour begin to take shape. The Strategy commits to supporting the development of material on tackling gender stereotypes in schools, which we welcome. But comprehensive prevention requires more: age-appropriate, evidence-based education on consent, healthy relationships and dating, and how to recognise and respond to violence. It also requires equipping educators with the tools to address VAW when they encounter it, and to support young people experiencing it. The Commission could issue guidelines to Member States on VAW prevention in educational settings within its existing competence.

We also note the Strategy's recognition of the growing gap in values and attitudes between young women and young men, with young men increasingly drawn to online spaces and narratives that promote misogynistic and anti-gender worldviews. WAVE believes schools are one of the most powerful spaces available to counter these narratives through meaningful dialogue, critical media literacy, and genuine engagement with young people's experiences and concerns. The commissioned study on online networks, spheres and narratives targeting young men and boys (under Principle 7) will only translate into primary prevention if its findings are operationalised in educational settings.

WAVE calls on the Commission to:

- Issue guidelines to Member States on VAW prevention in educational settings, including comprehensive relationships and consent education.
- Ensure that the forthcoming study on online narratives targeting young men and boys is translated into concrete educational responses.
- Support Member State teacher training on identifying and responding to GBV affecting students.

Principle 7: Active, equal and safe participation in public and political life

WAVE position: *The Strategy rightly names cyberviolence and the organised backlash against gender equality as threats to democratic participation, but its operational response stops at the online dimension and does not yet engage with the organised anti-gender movement operating within the EU policy space itself.*

WAVE welcomes the Strategy's recognition that women in politics and public life face disproportionate and escalating levels of cyberviolence, hate speech, and gender-based disinformation, and that this constitutes not only a violation of individual rights but a threat to

democratic participation. We welcome the forthcoming Commission Recommendation on safety in politics, the commitment to address disinformation attacks against women, and the study on online networks and narratives targeting young men and boys.

We also welcome the Strategy's explicit linkage of the backlash against gender equality to well-funded global movements and foreign information manipulation and interference. However, the Strategy's operational response focuses primarily on the online dimension and on the manosphere. The organised political backlash against gender equality, including anti-gender movements operating within the EU policy space, and the legislative rollback of women's rights in some Member States, is acknowledged in the Strategy's framing but not addressed in its actions.

We further note that participation in public life for women extends beyond formal political office. It means being safe in public spaces, free from harassment on public transport and in the streets, and able to contribute to community and civic life without fear. Urban planning, public infrastructure, and local safety policies are all dimensions of this, and WAVE welcomes the Strategy's reference to gender-responsive urban planning and safe public spaces.

Active participation in public life also encompasses women's engagement in civil society and advocacy. Women who organise collectively, who join or lead women's rights organisations, and who participate in policy processes are exercising a fundamental form of democratic participation — one that is increasingly under pressure as civic space narrows and anti-gender movements target the legitimacy of feminist civil society. Supporting women's ability to advocate, organise, and engage in public debate is not a secondary concern but a core dimension of equal and active citizenship — and one the Strategy should recognise explicitly.

WAVE calls on the Commission to:

- Ensure AgoraEU funding for women in politics includes feminist advocacy clear accessibility for women's rights organisations.
- Develop monitoring safeguards to prevent EU funds from reaching organisations whose activities undermine EU gender equality commitments.
- Extend its response on women's political participation beyond the online dimension to address the organised anti-gender movement operating within the EU policy space.

Principle 8: Institutional mechanisms that deliver on gender equality

WAVE position: *The institutional architecture proposed by the Strategy does not yet match the scale of its ambition: without a dedicated Council formation, a legal definition of intersectionality, a clear accountability architecture, named Member State responsibilities, and structured civil society involvement in monitoring, implementation will fragment into silos.*

WAVE welcomes the Strategy's commitments to gender mainstreaming across EU institutions, the proposed Performance Regulation making gender equality a horizontal principle in the 2028–2034 MFF, and the commitment to continued CERV and AgoraEU funding for feminist and women's rights organisations. We also welcome the strengthening of civil society representation in the Advisory Committee on Equal Opportunities for Women and Men and the call on Member States to put in place national gender equality action plans by the end of 2027.

Beyond these welcome commitments, however, WAVE identifies several structural gaps in the institutional architecture of the Strategy that will shape whether its commitments translate into real change.

The first concerns the absence of a dedicated Council formation on gender equality. The current lack of a dedicated space for Ministers responsible for gender equality to discuss institutional and cross-cutting issues slows progress and contributes to a fragmented approach across different Council formations. The Employment, Social Policy, Health and Consumer Affairs Council (EPSCO) carries part of the gender equality agenda within its broader employment and social affairs remit, but its scope cannot accommodate the structural, cross-sectoral and institutional dimensions of gender equality that a Strategy of this breadth requires, including violence against women, external action, justice, and the budgetary architecture of the MFF.

A second concern is that intersectionality lacks a legal foundation. The Strategy refers to intersectional approaches but does not propose any new legislation establishing a legal definition of intersectionality. The absence of such a definition structurally limits the EU's capacity to address the compounded forms of discrimination faced by women with disabilities, migrant and racialised women, LGBTIQ+ women, and Roma women, the women for whom existing frameworks are most inadequate. **Intersectionality as a horizontal principle without legal operationalisation has consistently failed to deliver concrete protection for these women.**

A third concern is the absence of a clear accountability architecture embedded in the Strategy at the moment when one is most needed. The Strategy sets out what the Commission will do, but it does not establish how progress will be tracked in a way that is visible, consistent, and responsive to civil society evidence. Without a defined reporting cycle, clear indicators, and transparent mechanisms for adjusting course when implementation falls short, the Strategy's ambitions risk dissipating over the five-year period into a series of disconnected workstreams. An accountability architecture would link the Strategy's commitments to the GREVIO monitoring cycle, to EIGE's Gender Equality Index, and to structured civil society reporting, and would create a predictable framework in which the Commission can be held to what it has committed to.

A fourth concern returns to the question flagged in the introduction and in WAVE's statement: the expanded role the Strategy gives to men and boys as policy subjects. The issue is not analytical alone. In the 2020–2025 Strategy, the data on GBV prevalence, the gender pay gap, the pension gap, and femicide provided the evidence base that justified priority action and made women and girls visible as the primary subjects and victims of structural inequality. In the GES 2026–2030, the anchoring is thinner, while the framing of men and boys as policy subjects is broader. The cumulative effect is a document that signals a more symmetrical political position between women and men than the structural evidence warrants, and symmetrical framing shapes symmetrical action, including gender-neutral approaches to violence against women that our members encounter with increasing frequency at the national level. **WAVE calls on the Commission to ensure that all implementation communications, monitoring reports, and progress assessments under this Strategy explicitly and consistently name women and girls as the primary subjects and victims of violence against women and structural disadvantage.** Engagement with men and boys must be situated within, not substituted for, that recognition.

A fifth concern relates to the treatment of Member States. The Strategy assigns its commitments almost exclusively to the Commission. Member States are largely framed as recipients of support, guidance, workshops, and best-practice exchanges rather than as actors with explicit, named responsibilities. This is a departure from the 2020–2025 Strategy, which included specific calls on Member States and the Council throughout each thematic chapter. While such calls are not legally binding, they carry political weight and establish a framework for accountability, and their absence weakens the architecture of the Strategy.

A sixth concern relates to the absence of gender budgeting from the Strategy's institutional architecture. The Strategy welcomes the proposed Performance Regulation, making gender equality a horizontal principle in the 2028–2034 MFF, but it does not use this moment to call for comprehensive gender budgeting across the EU budget. While the GES and the MFF are distinct policy instruments, the former a political strategy, the latter a binding regulatory framework, a Gender Equality Strategy is precisely the space in which the Commission should signal the political direction it expects the budget to take.

The [Nicosia Declaration](#), endorsed by a broad coalition of civil society organisations in March 2026, documents the structural shortcomings of the Commission's MFF proposal: the absence of explicit gender equality objectives in most programme regulations, the risk that gender mainstreaming is reduced to expenditure tracking rather than applied across the full budgetary cycle, and the lack of spending targets for gender equality comparable to those established for climate and biodiversity. These are not only budgetary concerns; they are institutional choices that determine whether the Strategy's commitments on violence against women, on care, on economic empowerment, and on specialist services will be resourced or remain aspirational. **A strategy that does not articulate the budgetary conditions for its own implementation concedes, from the outset, that its ambitions may not be matched by resources.**

Finally, the implementation architecture of this Strategy — across GBV, the VAW Directive, Istanbul Convention follow-up, and prevention — places actors in silos. The Commission works with Member States; EIGE produces evidence and analysis; civil society delivers frontline services; equality bodies handle individual cases. There is no systematic mechanism that brings these actors into genuine dialogue in a way that allows civil society evidence — including GREVIO reports and the frontline experience of specialist services — to inform Commission action on implementation gaps in real time.

WAVE calls on the Commission to:

- Advocate, with Member States, for the establishment of a dedicated Council formation on gender equality.
- Bring forward a legal definition of intersectionality as part of the Strategy's implementation.
- Establish a clear accountability architecture for the Strategy, with a defined reporting cycle, linked to the GREVIO monitoring cycle and EIGE's Gender Equality Index, and open to structured civil society reporting.
- Restore clear, named Member State responsibilities in all implementation communications and monitoring reports.

- Ensure all implementation materials explicitly and consistently name women and girls as the primary subjects and victims of gender-based violence and structural disadvantage, and guard against gender-neutral approaches to violence against women.
- Use the GES to advance comprehensive gender budgeting in the MFF 2028–2034 negotiations, including explicit gender equality objectives in programme regulations, and gender mainstreaming applied across the full budgetary cycle, not reduced to expenditure tracking.
- Design VAW Directive and Istanbul Convention monitoring processes that incorporate structured civil society input, including from women’s specialist service providers, as standard practice rather than exception.

Looking ahead

The adoption of the GES 2026–2030 is not the end of the road. The Commission has until 2030 to implement its commitments, and several of the Strategy’s more cautious positions, including the mapping of rape legislation, the study on femicide data, and the dialogue on care, are steps in an ongoing process that the Commission, civil society, Member States, and equality bodies will shape together. WAVE intends to be an active participant in that process.

We will follow closely the VAW Directive transposition process, the 2026 GREVIO baseline evaluation and the Commission’s response to it, the AgoraEU interinstitutional negotiations and the ring-fencing of the CERV+ and Daphne strand, and the Commission’s use of its own monitoring tools to hold Member States accountable for the gender equality commitments they have endorsed.

The women and girls supported by WAVE’s member organisations across 46 countries, survivors of domestic violence, sexual violence, and those facing discrimination and inequality in every dimension of their lives, deserve more than words. WAVE will measure the success of this Strategy not by its ambition on paper, but by the concrete improvements in women’s safety, rights, and opportunities that it delivers over the next five years.