



Acceptance with Reservations: WAVE Network's Stance on the EU Directive Addressing Violence Against Women and Domestic Violence

As Europe's leading network representing over 1,600 women's organizations through 179 members in 46 countries, the Women Against Violence Europe (WAVE) Network has consistently led advocacy for comprehensive legislation to protect and support victims of gender-based violence against women. **While we acknowledge the importance of the proposed EU Directive on Violence Against Women (VAW) and Domestic Violence (DV) as a significant step forward, our response is nuanced, reflecting a blend of cautious optimism and disappointment stemming from notable gaps in the legislation.**

We commend the Directive for its comprehensive approach towards establishing a culture of consent and addressing gender-based violence against women both online and offline. This is achieved through the **introduction of definitions for five technologically facilitated crimes and measures against female genital mutilation**, which are significant steps forward. Additionally, the Directive **enhances victims' access to justice and support services and acknowledges a broad spectrum of aggravating circumstances in the prosecution of crimes**. The protection extended to human rights defenders, journalists, and public figures, further underscores its commitment to tackling gender-based violence in all its forms.

Furthermore, **the Directive makes advancements in primary prevention, including access to sexual and reproductive rights, early intervention, and sexual education**. The mandate for creating national action plans and strengthening data collection mechanisms promises a more informed understanding of the scope of gender-based violence within the EU. The inclusion of a revision clause is a particularly hopeful provision, laying the groundwork for future enhancements to ensure the Directive can effectively combat all forms of gender-based violence against women.

However, our analysis identifies significant areas where **the Directive does not meet the expectations of our Network. Particularly concerning is the Directive's model for the coordination between general and specialised services**. It proposes a framework that positions Women's Specialist Services (WSS) in a subordinate role to general victims' services in cases of violence against women and domestic violence. This approach diverges from the Istanbul Convention's recommendation for multilevel coordination that allows victims/survivors direct access to Women's Specialist Services. **The lack of sufficient clarity in outlining a multilevel coordination approach between these two services represents a missed opportunity.**

Additionally, **the absence of a consent-based definition of rape and the inadequate protection for vulnerable groups, including undocumented and LGBTIQ women**, further signal a departure from closely aligning with the standards set by the Istanbul Convention and comprehensively addressing the multifaceted nature of gender-based violence.

Despite these concerns, **WAVE is committed to supporting the Directive's adoption** and is further committed to working towards expanding the scope of the Directive and revising its implementation. We aim to ensure that a revised version fully meets the needs of women, addressing the gaps identified and enhancing protections to ensure a comprehensive and effective response to gender-based violence across the EU. We will continue to provide a detailed analysis, focusing on the provisions related to prevention, child protection, and specialized victim support.

Our 30-year journey has shown us that progress towards gender equality and the realization of women's rights is significantly slow. **The adoption of this Directive represents a substantial,**



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yet imperfect step in the EU's approach to combating violence against women and domestic violence. As we approach the critical plenary session in April, WAVE appeals to all MEPs to recognize the urgency of adopting this legislation. Our network will remain steadfast in advocating for women's rights and is committed to supporting the Directive's enhancement and implementation, striving for a Europe where gender equality is realized and gender-based violence is eradicated.

The WAVE Network