



# Input to the EC Consultation on the next MFF

## Introduction

The End FGM European Network is a framework partner of the European Commission under the Citizens, Equality, Rights and Values (CERV) funding stream. Over the past decade, our Network has collaborated closely with the EC and EU policy-makers to advance the elimination of female genital mutilation (FGM) and gender-based violence (GBV), in Europe and beyond. As key partners and representatives of civil society and women's rights organisations committed to achieving gender equality within the EU and abroad, we gladly provide our input to feed the ongoing discussions and negotiations towards the next multiannual financial framework (MFF), which have far-reaching implications for the future of the Union and its people.

The following recommendations require the integration of a gender perspective in the budgetary process, which allows for the promotion of gender equality goals from the design and allocation phase of budgeting.

The next MFF must ensure:

- The continuation, strengthening and improvement of the CERV Programme, essential for the advancement of gender equality and the sustainable elimination of gender-based violence such as FGM.
- Integrated, systematic gender impact assessments for all spending decisions, guaranteeing their role in reducing inequalities is evaluated and monitored.
- Amplified yet effective frameworks to support implementation, preventing excessive administrative burdens, particularly for smaller CSOs, while ensuring meaningful accountability and transparency.
- EU funding of actions that are in line with the fundamental values enshrined in the EU Charter of Fundamental Rights, therefore guaranteeing no EU funding supports initiatives that have a rights-restrictive (or openly anti-rights and de facto discriminatory) stance.



## Our priorities for the next MFF

- Citizens, Equality, Rights and Values (CERV)

Programmes such as the Citizens, Equality, Rights and Values (CERV), part of the broader Justice, Rights, and Values Fund, are critical in supporting civil society organisations (CSOs) that play a key role in upholding democratic values, protecting fundamental rights, achieving gender equality and fostering Union values and the rule of law.

In particular, for a membership network like ours that strives to represent national women's rights organisations and be an effective bridge between the local needs and the supranational efforts of harmonisation, **CERV has been quite literally vital for our work**. CERV funding has allowed **our network to be consolidated** and grow, achieving concrete impact and shaping the important policies that concern the FGM-affected communities we serve and represent, and **facilitating the creation of spaces for Survivors and community experts to take the lead**.

Funds like CERV play a unique role in fostering democratic resilience, and economic competitiveness, and ensuring the inclusivity of social policies. **It is vital that the MFF continue to integrate the prioritisation of gender equality, non-discrimination, accessibility, and full adherence to the Charter of fundamental rights of the European Union**, as well as to the treaties and Conventions it is bound by (Convention on the Elimination of All Forms of Discrimination against Women - CEDAW and the Council of Europe Convention on Preventing and combating violence against women - Istanbul Convention). These cross-cutting principles are necessary and must be systematically embedded throughout the design, implementation, and evaluation of MFF implementation instruments like CERV and the Daphne strand that must be solidified to ensure steady advancement when it comes to reaching full gender equality and prevent any setback.

All strands are crucial and should remain priorities in the next cycle, as they address important dimensions of rights and values as well as democratic participation. Moreover, the direct management of CERV Programme by the European Commission is positive as in certain countries it can be a **crucial support for independent civil society working in hostile environments and supporting marginalised communities with a focus on women in their diversity**. Currently, CERV represents 0.4% of the MFF 2021-2027. **The amount of resources allocated to the CERV Programme should be considerably increased** to take up these challenges.

- Human Rights before competitiveness

The MFF must reflect a human rights approach that prioritises social cohesion, inclusion, and fundamental rights, rather than treating them as secondary to economic competitiveness. While investment in innovation, decarbonisation, and security are crucial, these transitions cannot come at the expense of social rights and equality. A narrow focus on competitiveness risks deepening existing gender



inequalities and excluding those most affected by economic and environmental shifts. Structural investments in social infrastructure, particularly in essential support services for vulnerable and underrepresented communities, must be central to the MFF to ensure that no one is left behind in Europe's economic and social transformation. In order to design a framework that allows for systemic improvement, an intersectional approach is necessary: **human rights and gender equality must be mainstreamed throughout all funding programmes.**

- **Strengthened support for civil society**

Civil society organisations contribute in bridging the gap between policy ambitions and lived realities, particularly those working to promote gender equality, women's rights and uphold fundamental rights. These organisations provide front-line services, advocate for inclusive policies, and ensure that the voices of underrepresented groups are heard in decision-making processes. Their contributions are indispensable in advancing equality, preventing and combating gender-based violence, and fostering social justice.

Yet, we observe a constantly shrinking civic space, rising polarisation and stigma, and uncertainty around funding that threatens our ability to operate effectively. Over the past decade and in the aftermath of the latest European elections, we are witnessing a **worrying rise of far-right ideologies that translate into severe backlash on equality** and fundamental rights. **The first to be affected are women in their diversity and at the intersections of multiple vulnerabilities**<sup>1</sup> (for example women with a migrant background or an unstable socio-economic situation that are also Survivors of FGM/GBV or from an FGM-affected community). This can exacerbate their situation and expose them to further risks of violence or marginalisation. Another category that faces immediate consequences are activists, human rights defenders and civil society organisations: as the European Commission's annual Rule of Law report shows, CSOs and activists are increasingly under attack<sup>2</sup>.

Moreover, **very often the most vulnerable populations in Europe are third-country nationals, especially women, and this is also the case for many FGM-affected communities.** One crucial fund that has allowed to provide support for such communities is the Asylum, Migration, and Integration Fund (AMIF), complemented by mainstream social inclusion programmes through the European Social Fund Plus (ESF+). Integration programmes funded through AMIF focus on both early integration measures such as language support, education and civil orientation, and longer-term integration measures.

---

<sup>1</sup> Gender equality and SRHR are among the first targets of authoritarian and ultraconservative forces. Across the EU, there is a well-funded and coordinated backlash, with significant support from actors within and beyond Europe. EPF's *Tip of the Iceberg* analysis, reports that over the 2009–2018 period over USD 707 million were dedicated to funding organisations working specifically to obstacle the progress of civil society promoting women's rights, gender equality and SRHR <https://www.epfweb.org/node/837>

<sup>2</sup> COM(2024) The rule of law situation in the European Union; [https://commission.europa.eu/document/download/27db4143-58b4-4b61-a021-a215940e19d0\\_en?filename=1\\_1\\_58120\\_communication\\_ro\\_l\\_en.pdf](https://commission.europa.eu/document/download/27db4143-58b4-4b61-a021-a215940e19d0_en?filename=1_1_58120_communication_ro_l_en.pdf), p. 33.



Following the adoption of the New Pact on Migration and Asylum (2021), there will likely be an increased focus on migration funds that might divert spending from the internal to the external focus (within the anti-migration agenda). The potential de-prioritisation of this spending can exacerbate the discrimination and the, often already rough, reality of people on the move. **The future funding instrument for asylum and migration must have a strong component of integration and socio-economic inclusion, dedicated to third-country nationals - and specifically women third-country nationals - in the EU.** This should be in addition to the mainstream socio-economic inclusion and integration measures supported by ESF+.

To counter and prevent the worsening of this trend, **the next MFF must guarantee long-term, accessible, and sustainable funding for civil society organisations, including through the provision of funding for smaller, grassroots/community-based organisations,** reducing administrative burden and ensuring they can continue their work in protecting rights, promoting gender equality, and strengthening democracy across the Union.

Building on successful national experiences—such as France’s *Fonds de soutien aux organisations féministes* (FSOF), which provides direct, flexible and long-term funding to feminist organisations globally—the **creation of a European Feminist Fund would offer a structural response to the chronic underfunding of these essential actors.** By targeting organisations at the forefront of gender equality, democracy and human rights—often operating in shrinking civic spaces—such a fund would reinforce their capacity to act and resist. It would also demonstrate the EU’s political will to resource feminist movements as vital forces for inclusive, democratic and resilient societies.

Building on the example of FAST-CARE<sup>3</sup> and AMIF, the next programme should enhance funding effectiveness by earmarking 30% of its resources for civil society and local/regional authorities through shared, direct, and indirect funding modalities.

Additionally, to truly allow Networks with global missions like ours to advance and achieve their mission, **we need more funding opportunities that support our action to be trans-continental. We cannot complete SDG 5.3 if we do not have resources to adapt to the reality of a globalised world:** the European-based communities we represent are often from a diaspora, and the issues to be overcome must be synergised. **FGM is a global issue, and our movement needs the resources to address it as such, other than locally, nationally and regionally.**

---

<sup>3</sup> ‘Flexible Assistance to Territories’ (FAST-CARE) is a package proposed by the European Commission in June 2022, extending the support already provided under Cohesion’s Action for Refugees in Europe (CARE)



- **Invest in prevention and care**

As we outline in our annual campaign [#Invest2PreventFGM](#), in order to reach a sustainable elimination of female genital mutilation and all forms of gender-based violence, we must target its root systemic causes.

**Prevention and support are key** aspects of this process. Supporting survivors allows a process of healing, which positively affects both the individual and the system that surrounds them. Prevention, through (formal and informal) education, awareness and community-building, designed with the lens of intersectionality and around gender-transformative approaches, saves lives and improves their quality.

For this reason, we promote a **holistic approach to health and wellbeing** and advocate for more **multidisciplinary healthcare centres for FGM Survivors and people at risk**.

To make progress in the delivery of the necessary sexual and reproductive health rights (SRHR) and general health services that are necessary for the effective elimination of FGM and GBV, the next MFF must have a solid health budget allocation to:

- Support healthcare systems in preparing for current and future health challenges, ensuring timely **access to affordable, holistic and high-quality healthcare for all**.
- **Strengthen public health initiatives that promote mental health and a holistic, intersectional approach to wellbeing** for systemic and people-centred growth.
- **Guarantee financial support for SRHR and health-focused women's rights organisations, including in the related policy and advocacy activities**, recognising their vital role in shaping and informing health policy decisions, as well as training providers of support services, based on the real needs of patients and key professionals and experts, including FGM Survivors and affected communities.

#### **About End Female Genital Mutilation European Network (End FGM EU)**

*The End FGM European Network (End FGM EU) is an umbrella network of 39 national organisations working in 16 European countries who are expert on female genital mutilation (FGM). End FGM EU operates as a meeting ground for communities, civil society organisations, decision-makers and other relevant actors at European level to interact, cooperate and join forces to end all forms of FGM in Europe and beyond. We put at the heart of our work grassroots voices to influence European governments and policy-makers to work towards the elimination of FGM. We build our members' capacity, offer spaces to share expertise and develop partnerships.*

*While dedicated to being the driving force of the European movement to end FGM, we are equally committed to build bridges and cooperation with all relevant actors in the field of FGM both in Europe and globally. In this sense, we actively promote and foster cooperation between the European movement and movements in other regions of the world.*

*For any further information, please contact Xheni Dani, Policy & Advocacy Coordinator, at [xdani@endfgm.eu](mailto:xdani@endfgm.eu).*

*Our website <https://www.endfgm.eu/>*