

A GENDER ANALYSIS OF THE EU GROWTH PLAN
FOR THE WESTERN BALKANS

BLIND SPOTS OR INCLUSIVE GROWTH?





"Da dostojanstvo ne bude luksuz"/For dignity not to be considered a luxury – banner at the International Women's Day Protests 2025 in Belgrade, Serbia
Photo: Lara Končar

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LAYOUT: Tijana Dinić

COVER PHOTO: Young woman protester at the International Women's Day Protests 2025 in Belgrade, Serbia.
Photo by Lara Končar

The Kvinna till Kvinna Foundation, November 2025



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About The Kvinna till Kvinna Foundation

The Kvinna till Kvinna Foundation has defended women's rights since 1993. For every women's right to be safe and to be heard. Today we are one of the world's leading women's rights organisations, working directly in areas affected by war and conflict to strengthen women's influence and power. We work closely together with over 100 local partner organisations across 20 countries to end gender-based violence, reach lasting peace and close the gender gap.



Woman protester looking at the crowd
at the International Women's Days Protests
2025 in Belgrade, Serbia.
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Executive summary

This report examines the EU Growth Plan for the Western Balkans, adopted by the EU in November 2023, and the connected Reform Agendas through a gender lens. The Growth Plan was designed to foster economic convergence with the EU, propel regional integration and deepen fundamental reforms by linking financial support to national Reform Agendas. The study finds that **gender disparities are overlooked in the EU Communication on the Growth Plan**, both as a structural problem holding back economies in the region and as a critical area to be addressed to boost economic growth and foster a culture of equality and inclusion in the region. **However, the Regulation establishing the Growth Facility includes gender equality, gender mainstreaming and the empowerment of women and girls among the specific objectives** of the new financial instrument, laying a strong legal foundation for prioritising gender equality reforms in the Reform Agendas.

The analysis of the five Reform Agendas adopted by the countries in the region¹ displays different approaches to gender mainstreaming and varying degrees of analysis of gender disparities across the different policy areas. Our study shows that **proposed reforms and measures are often insufficient to address the scale of current gender disparities in the different countries in the region and that critical reforms are left out**. As a case in point, the adoption of legislation introducing adequate social welfare protection for women and girls in Albania, the adoption of

the new Gender Equality Law in North Macedonia, the adoption of the new Labour Law in Kosovo in line with the EU Work-Life Balance Directive are missing from the Reform Agendas. In Serbia, while the Reform Agenda includes several measures on gender equality, the Law on Gender Equality, which constitutes the legal foundation for such reforms, was suspended by the Constitutional Court in June 2024.

Gender-sensitive reforms are included primarily under the areas of Fundamental Rights and Human Capital, focussing on measures to address gender-based violence, foster pre-school childcare facilities and women's participation in the labour market through targeted measures. Enhancing protection of LGBTQI+ rights, as provided for in the Regulation, is entirely missing from all Reform Agendas. Overall, while many Reform Agendas recognise the role that Digitalisation can play in reducing the gender gap they fail to identify specific measures to ensure equitable and safe access to digital tools. Similarly, most Reform Agendas mention the vulnerabilities and opportunities associated with climate change and energy transition but then fail to introduce specific gender-sensitive measures. The policy area of Private Sector Development and Business Environment generally overlooks gender disparities, with limited exceptions.

A more comprehensive gender-mainstreaming approach, analysis of gender disparities and development of gender-sensitive reforms is

¹ Bosnia and Herzegovina's Reform Agenda, adopted and submitted to the European Commission on 30 September 2025, is not included in the study since it has not been published and its content remains unavailable to public scrutiny.

needed to tackle structural issues such as unequal access to resources, land, education, jobs and social protection – among others – which are key pillars of a healthy and inclusive social and economic fabric. Also, the growing backlash against women's rights and the influence of the anti-gender movement across the Western Balkan region which threatens to hold back crucial reforms and legislation on gender equality should not be underestimated in the implementation of the Reform Agendas as it risks undermining the stated objectives. A clear strategy as well as concrete tools are needed to address this phenomenon.

Finally, although with variations from country to country, **women's organisations interviewed for the study stressed the lack of transparency,**

adequate feedback loops and inclusiveness of the consultations held to inform the development of the Reform Agendas by their respective governments. Marginalised groups (Roma, Egyptians, LGBTQI+, rural women and women with disabilities) were systematically left out of the consultation processes. The findings suggest that for the Growth Plan to fully serve its transformative potential, the EU must ensure gender mainstreaming of all the policy areas of the Reform Agendas, including recommending key reforms and adoption of legislation that are currently missing. Enhanced transparency, gender-responsive monitoring and active engagement of civil society will be crucial in ensuring that the benefits of the Growth Plan extend equitably to all citizens.



"Ženska revolucija"/Women's Revolution – banner at the International Women's Day Protests 2025 in Belgrade, Serbia
Photo: Lara Končar

Recommendations for the EU

1. Condition disbursement of Growth Plan instalments on clear progress in upholding reforms on fundamental rights, including women's rights, LGBTQI+ rights, civic freedoms and the protection of civic space, and suspend payments where backsliding is evident.
2. Urge the authorities of Bosnia and Herzegovina to make the Reform Agenda publicly available and stress that its adoption is in breach art 11 of the Regulation which requires Reform Agendas to be prepared in an inclusive and transparent manner, in consultation with social partners and civil society organisations. Urge authorities to set up a consultation mechanism to involve civil society and other relevant stakeholders in the implementation and monitoring of the reforms as a condition for disbursement of funds.
3. Ensure thorough monitoring and evaluation mechanisms of Reform Agendas are set up at national level, including by recommending the systematic inclusion of gender-responsive indicators across all policy priorities in National Reform Agendas.
4. Demand meaningful participation of diverse civil society organisations, including women's and LGBTQI+ civil society organisations, in the monitoring and evaluation mechanisms at national level especially for reforms related to fundamental rights
5. Consider the negative impact of anti-rights groups on the achievement of concrete outcomes of the Reform Agendas and develop a comprehensive approach to tackle this phenomenon in the context of the EU Accession process
6. Report on the implementation of key reforms aimed at strengthening gender equality in the respective countries to the European Parliament and the Member States on yearly basis

Recommendations for the Western Balkan countries:

7. Adopt a more comprehensive gender mainstreaming approach when revising the National Reform Agendas and use gender analysis to identify the key gender disparities across the different policy domains
8. Ensure that all reforms undergo a mandatory gender impact assessment before adoption, to ensure reforms do not reinforce existing inequalities but actively contribute to close gender gaps in fundamental rights, labour, education and training, business development, digital and green transition
9. Develop robust monitoring, reporting and evaluation mechanisms to oversee and assess the implementation of reforms and ensure they are gender-sensitive by integrating adequate indicators in line with GAP III
10. Make meaningful participation of diverse civil society organisations, including women's civil society organisations, a key pillar of the monitoring mechanisms at national level
11. Further support the strengthening of mechanisms to collect quality sex-disaggregated data across different domains by reinforcing the capacity and independence of the National Statistical Offices and ensuring systematic trainings to officials in gender-sensitive data collection and analysis
12. Provide regular, structured and transparent reporting on the use of the Growth Plan funding, clearly demonstrating how resources benefit diverse groups in society, including women, girls, people with disabilities, minorities, people living in rural areas

A close-up photograph of a woman's hands holding a black book. The woman has red-painted fingernails and is wearing a blue patterned shawl over a red top. The book's cover is black with the words "BE THE CHANGE" in large, bold, white capital letters. At the bottom of the cover is the Kvinna till Kvinna logo, which consists of three horizontal white bars of increasing length to the left of the text "KVINNA" and "KVINNA" stacked vertically.

**BE THE
CHANGE**

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"Be the Change"
by Kvinna till Kvinna –
Brussels Advocacy Week 2025,
Brussels, Belgium
Photo: Johanna de Tessieres

Introduction

A new impetus for the Western Balkans: The Growth Plan

On 8th November 2023, the European Commission (EC) adopted the Growth Plan for the Western Balkans², aimed at reinforcing economic integration of the region with the EU single market and within the Western Balkans through the Common Regional Market and accelerating EU-related reforms, including in the fundamentals cluster. The Reform and Growth Facility for the Western Balkans, the new financial instrument introduced under the Growth Plan, has a total envelope of 6 billion EUR (2 billion in grants and 4 billion in loans) for the period 2024–2027 and complements existing funding disbursed through the Instrument for Pre-Accession III. Access to financial assistance through the Reform and Growth Facility for the Western Balkans is tied to conditionality in line with the criteria of European Union (EU) membership and the EU's revised enlargement methodology as presented in 2020.³

Seeing economic convergence as a key factor for the Western Balkan's progress on their EU path, and also as a central element in contributing to regional and European stability, the Growth Plan is intended to incentivise the Western Balkans' preparations for EU membership by bringing

forward some of its benefits especially in ways that can be felt directly by the citizens of the Western Balkans countries⁴. This comes at a time when, in the face of global geo-political shifts, ongoing wars at the EU's periphery and after a decade of stagnation in the EU accession process, enlargement has taken center stage again on the EU's agenda.

With a wavering commitment to the EU path, the Growth Plan, which has the potential to double the size of the Western Balkans economies in the next decade, is expected to push governments in the region to adopt much needed reforms to move forward on their membership path. This report is a study on the Growth Plan, its financial instrument and the attached National Reforms Agendas and their potential to boost gender equality reforms in the region. Given that implementation is just kicking off while this report is being written, the study also aims to provide recommendations to inform its further implementation, monitoring and evaluation so that *all* citizens, including women and marginalised groups particularly, have an opportunity to benefit from it.

2 European Commission (08.11.2023). New Growth Plan for the Western Balkans. COM (2023) 691 final <https://neighbourhood-enlargement.ec.europa.eu/document/download/8f5dbe63-e951-4180-9c32->

3 European Commission, Communication – Enhancing the accession process – a credible EU perspective for the Western Balkans (2020)

4 European Commission (08.11.2023). New Growth Plan for the Western Balkans. COM (2023) 691 final

Gender equality and EU Accession



To this day, the EU has developed a comprehensive body of legislation and standards aimed at protecting and advancing gender equality in the EU Member States, including most recently specific directives to address gender-based violence. In line with the Copenhagen criteria⁵, accession countries need to align their legislation to this body of EU law, commonly known as the *EU Acquis Communautaire*, to be able to join the EU.

Reforms and adoption of legislation in line with the EU acquis on gender equality is, therefore, an essential component of the EU accession process. With the adoption of the revised methodology for accession⁶ in 2020, gender equality is now part of Cluster 1, the so-called “fundamentals cluster”, which includes Judiciary and Fundamental Rights along with economic criteria, functioning of democratic institutions and other key chapters. Progress under this Cluster determines the pace of negotiations as it is opened first and closed last.

However, in EU enlargement negotiations attention to the rights of women and girls is condensed in Chapter 23 (Judiciary and Fundamental Rights) and Chapter 19 (Social Policy and Employment). The gender mainstreaming approach adopted by the EU in 1990s to ensure further integration of gender aspects in all policy domains continues to fall short of its expectations. Studies show that comprehensive gender-mainstreaming guidelines to guide negotiations on the different accession chapters are missing and that “the pace at which other chapters are being

gender-mainstreamed is too slow”⁷. Chapters concerning Agriculture and rural development (11), Energy (15), Environment and climate change (27) continue to be generally gender-blind.

To further underscore the commitment of the EU to gender equality in external policies, in 2020 the EU adopted the Gender Action Plan III (GAP III)⁸, a comprehensive policy aimed at promoting women’s rights and gender equality across partner countries including accession countries. In the Western Balkans, **GAP III also supports the accession process by promoting gender equality** through targeted actions, policy dialogue and funding. This process has been further aided by the adoption by the EU Delegations of Country Level Implementation Plans (CLIPs) setting policy priorities, key actions and objectives on gender equality for each country. These plans, developed in partnership with national stakeholders, were also informed by Gender Country Profiles and sector-specific Gender Analyses for the priority areas.

In the Western Balkans, **the EU insists on the mutual dependence of economic growth and fundamental reforms**, with strong emphasis on rule of law as foundation for proper functioning of the state. However, it has often failed to acknowledge the connection between gender equality and economic growth, by clearly linking the goal of narrowing the gender gap in multiple areas with that of boosting the economies in the region and adopting targeted measures for women and girls.

⁵ Copenhagen criteria (1994).

⁶ Enhancing the accession process – a credible EU perspective for the Western Balkans, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, COM (2020) 57.

⁷ The Kvinna till Kvinna Foundation (2024), A low hanging fruit. Gender Analysis of the 2023 European Commission Country Reports for the Western Balkans.

⁸ Joint Communication to the European Parliament and the Council – EU Gender Action Plan III: An ambitious Agenda for Gender Equality and Women’s Empowerment in EU External Action

The case for a clear gender dimension in the Growth Plan

Numerous studies show the **strong connection between gender equality and economic growth**. Research from the International Monetary Fund (IMF) suggest that narrowing the gender gap in labour markets could increase gross domestic product (GDP) in emerging market and developing economies by almost 8%. The gains from fully closing the gender gap would be even higher, lifting GDP in those countries by 23% on average.⁹ A study from the European Investment Bank (EIB) suggests that firms led by women have higher environmental, social and governance (ESG) scores.¹⁰ Also, studies show the close correlation between women's leadership, climate action and green transition, a key component of the Growth Plan.

While over the last decade, **Western Balkan countries have made great strides towards adopting gender equality legislation and improving standards in line with the EU Acquis, much remains to be done.**¹¹ Across the Western Balkans, women's economic inclusion remains a challenge, putting women at disproportionate risk of financial dependency and poverty. This risk increases with the addition of intersectional experience of discrimination, such as for Roma women. A significant employment gap between men and women remains in all countries, including a greater likelihood for women to experience a job-education mismatch.¹² Albeit with high regional variation (from 39.1% in Serbia to 79.9% in Kosovo, 2022¹³), women's inactivity



Protesters at the International Women's Day Protests 2025 in Sarajevo, Bosnia and Herzegovina
Photo: Almira Mehić

9 Interim Guidance Note on Mainstreaming Gender at the IMF, IMF (2024) cited in The Economic Power of Gender Equality, by Nadia Calviño, Kristalina Georgieva, and Odile Renaud-Basso, EIB (2024).

10 Survey on why it makes sense to support women entrepreneurs in Europe (EIB) 2022.

11 See also Recommendations from the Berlin Process Gender Equality Forum 2024.

12 Besnik A. Krasniqi, Genc Zhushi, Mehmet Bağış, Liridon Kryeziu, and Agon Dula (2022), Horizontal Job-Education Mismatch in Kosovo: Is There a Gender Gap? In Towards Economic Inclusion in the Western Balkans. Palgrave Macmillan.

13 Regional Cooperation Council, Regional Comparative Report on Women's Employment in Western Balkans (2022)

in the (formal) labour market is high. With many women employed in the informal market subject to risks of exploitation and no welfare protection, women's participation in the labour market and connected economic growth in the Balkans requires a gender-specific analysis.

In addition to the general employment gap, significant gender pay gaps persist across the region and across industries. Despite women being on average better educated than men, gender pay gaps are as high as 37.8% in Bosnia and Herzegovina and lowest in Albania with 6.6%. Research also indicates challenges for female entrepreneurs, including structural barriers to self-employment like lower financial resources and negative expectations based on their gender.¹⁴

The task of unpaid care and housework, which easily becomes a burden, lies overwhelmingly on women's shoulders, accelerated by the absence of functioning welfare systems. Access to services and medical treatment often requires personal networks – persons with a lower social status and less access to power have a lower bargaining power in societies with high levels of informality and corruption, further marginalising under-privileged women.

All of this contributes to a higher risk of poverty for women, a risk that grows with age. As such, their own well-being is threatened. While it is often structural violence and discrimination that keeps women from participating in public life, the labour market or politics, their economic dependency further increases their vulnerability to (domestic) violence and abuse, often making it difficult or impossible to leave violent relationships.

Domestic violence against women continues to be rampant, with one out of three women who experience at least one form of violence during her lifetime. Gender-based violence continues to be regarded as a women's issue instead of a systemic issue and rule of law issue affecting the whole of society. The legislation of the Western Balkan countries is not yet fully in line with international standards (Istanbul and CEDAW Convention) and the EU *acquis* legislating on different forms of online violence. Much remains to be done to ensure a more victims-based

approached in line with the requirements of the EU Victims' Rights Directive.

A concerning development in the region further endangering progress for women and girls is the rise of the anti-gender movement which has been growing in influence and reach over the last few years. Supported at times by politicians and religious figures, the anti-gender movement is growing into a well-organised and well-funded system directly opposing the founding values of the EU, posing a great threat not only to gender equality but jeopardising the EU project as such. In practice it has led to: delays in adoption of relevant legislation on gender equality and LGBTQI+ rights (North Macedonia); questioning the constitutionality of existing legislation guaranteeing gender equality (Serbia); blocking legislation on gender-based violence (Republika Srpska); removing gender equality issues from the political agenda (Montenegro); removing gender as a ground for discrimination in several laws in North Macedonia; targeting female politicians, journalists and women's rights activists (Albania, Serbia, Montenegro, Bosnia Herzegovina); normalising attacks towards women and LGBTQI+ people online and offline.

These issues all contribute to weak social fabric and untapped economic and political potential across the region. Economic growth and transition to a more sustainable economy cannot be achieved without the participation of women. Increasing women's participation in the economy by guaranteeing their rights and increasing their opportunities, developing targeted measures to ensure their access and permanence in the formal economy, ensuring appropriate social protection while fighting gender-based discrimination and violence, all sustainably and effectively strengthen economies and political systems.

For this reason, the Growth Plan can only be successful if it acknowledges the persistent gender disparities in societies that hamper sustainable growth across the region and if it aims to support structural reforms and targeted measures to reduce such gaps and address systemic discrimination of women and girls. Trying to fix an economy without gender-specific attention is like trying to jump-start a car with the wrong fuel in the engine.

Analysis of the Growth Plan from a gender perspective

The Growth Plan is designed to integrate Western Balkans into the EU's Single Market, advance regional economic cooperation, deepen EU-related reforms and increase pre-accession funding in view of accelerating socio-economic convergence of the region to the EU. The financial package aims to complement existing funding instruments such as the Instrument for Pre-Accession III (IPA III) and bilateral assistance to countries in the Western Balkans. Overall, the Growth Plan has the potential of doubling the Western Balkans economies in a decade.

Its main novelty, according to the EC Communication¹⁵, **consists in a pillar structure and a multi-layered system of conditionality postulating the completion of reforms as a basis for the release of funds.** The multi-layer conditionality mechanism requiring pre-conditions, general conditions as well as specific conditions for each country based on their planned reforms sets this financial tool apart from the IPA III and other financial instruments which are not based on ex-ante conditionality. The new Facility will mix grants and loans, which will bring



¹⁵ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the new Growth Plan for the Western Balkans COM(2023) 691 Final.

about a stronger incentive to implement key structural reforms by the Beneficiaries.

However, while this structure and ex-ante conditionality raises hopes about how the new funds may incentivise key structural reforms, including those addressing systemic gender disparities in social, economic and public sectors of the countries in the region, **the Communication on the new Growth Plan falls short of specifically mentioning gender**

disparities as underlying causes of limited economic growth or any attention to women (or any group for that matter) as a key engine for sustainable growth. It rather refers to the need to accelerate fundamental reforms, including on the rule of law, democracy, respect for human rights and fundamental freedoms.¹⁶ This is a clear missed opportunity for the EU to show it recognises gender equality as a key component of its approach to accompany the Western Balkans on its accession path.

Info Box: the 4 Pillars of the Growth Plan

Pillar 1:

Enhancing economic integration with the European Union's single market

Priority actions for pillar 1 include (1) Free movement of goods, (2) Free movement of services and workers, (3) Access to the Single Euro Payments Area (SEPA), (4) Facilitation of Road transport, (5) Integration and de-carbonisation of Energy markets, (6) digital single market, and (7) Integration into industrial supply chains.

Pillar 2:

Boosting regional economic integration through the Common Regional Market

The CRM is a result of the Berlin Process, first implemented in 2020 in cooperation with the Regional Cooperation Council, designed to provide a framework for economic integration and cohesion in the Western Balkans.

Pillar 3:

Accelerating fundamental reform

The third pillar focuses on reforms under the “fundamentals cluster”, namely rule of law and fundamental rights, underlying the connection between fundamental reforms and economic growth. Western Balkan partners are invited to develop a National Reform Agenda with a limited set of priority reforms which will serve as payment conditions.

Pillar 4:

Supporting convergence through increased financial assistance: the new Reform and Growth Facility for the Western Balkans

The Reform and Growth Facility is a new financing tool introduced with the Growth Plan. The proposed facility will cover the period 2024–2027. It would provide financial support in the form of non-repayable support (up to EUR 2 billion) and loans (up to EUR 4 billion) through direct disbursements to the national budgets, or as capital investment financing through the Western Balkans Investment Framework (WBIF).

The **first pillar focuses on the economic integration with the European Union Single Market**, which has been a main driver of economic growth for countries joining the EU. This pillar identifies seven initial priority areas which the EU could offer to Western Balkan countries, provided they align their Acquis in each specific area and have the necessary infrastructure and working institutions. These areas span from free movement of goods, services and workers to access to the digital single market.

The second pillar of the Growth Plan centres around the Common Regional Market (CRM), an effort of regional economic cohesion among the Western Balkans 6 (WB6), inaugurated during the Berlin Process Summit 2020 and managed by the Regional Cooperation Council (RCC). Four-year Action Plans are developed in cooperation with WB6 administrations, regional partners and with support of the European Commission. Compared to previous plans, **the new Action Plan 2025–2028¹⁷ shows significant increase in the reference to women, as well as emphasising the need for women’s economic empowerment and the importance of closing the gender gap for sustainable growth and development.** CRM Action Plan 2.0 expresses commitment to “intra-WB6 social portability”¹⁸ and the establishment of a Social Security Network, however without specific attention to the gendered dimension, or the fact that the current social security systems as they exist, are often inaccessible to women or marginalised groups.

The third pillar acknowledges that economic growth requires comprehensive reforms aimed at guaranteeing a functioning democratic state, rule of law, protection of rights of minorities and human rights. It therefore establishes a clear correlation between the reforms in the fundamentals cluster and funds of the Growth Facility.

This pillar is, therefore, the crucial one to ensure that the additional funds provided under the Growth Plan are closely connected to fundamental reforms and advancement in gender equality, despite the lack of an explicit reference to the latter. Under this pillar, governments of the Western Balkan countries were expected to develop national Reform Agendas based on existing EU recommendations, including from the Enlargement package, and approved by the European Commission.

The fourth pillar establishes the new financial mechanism at the basis of the Growth Plan, the new Reform and Growth Facility. For the period of 2024–2027, up to EUR 6 billion will be made available (EUR 2 billion of non-repayable support and EUR 4 billion in loans). The payment is tied to conditionality, and in order to be eligible for funds, governments must present so-called Reform Agendas. The Facility is intended to be complementary to and mutually reinforcing with the current financial assistance under IPA III. The regulation establishing the Reform and Growth Facility is further analysed in the section below.



Women human rights defenders walking next to the EU Parliament building – Brussels Advocacy Week 2025, Brussels, Belgium
Photo: Johanna de Tessières

17 Common Regional Market Action Plan 2025–2028, accessed at <https://www.rcc.int/pubs/189/common-regional-market-action-plan-2025-2028>

18 Common Regional Action Plan 2025–2028, P. 6

Analysis of the Reform and Growth Facility for the Western Balkans

The **Regulation establishing the Reform and Growth Facility¹⁹ (RGF) the “centrepiece” of the new Growth Plan**, establishes the specific objectives of the Facility, the general principles underlying the new financial tool as well as the pre-conditions, rules for implementation, monitoring, reporting and evaluation.

The preamble of the Regulation mentions that “In addition to boosting socio-economic convergence, the Facility **should also help accelerate reforms related to fundamentals of the enlargement process including rule of law, fundamental rights, inter alia, the rights of persons belonging to minorities, including national minorities and Roma, as well as the rights of lesbian, gay, bisexual, transgender and intersex (LGBTI) persons**. It should also improve the functioning of democratic institutions and public administrations; public procurement, State aid control and public finance management; the fight against all forms of corruption and organised crime; quality education and training as well as employment policies; the region’s green transition, climate and environmental objectives.”²⁰

It further includes a strong reference to the principles of equality and non-discrimination,

as elaborated in the Union of Equality strategies, which should guide the implementation of the financial instrument. It further underlines that **the RGF will promote and advance gender equality and mainstreaming**, ensure meaningful participation of women in decision-making processes, and the empowerment of women and girls, and seek to protect and promote women’s and girls’ rights, as well as prevent and combat violence against women and domestic violence, taking into consideration relevant EU Gender Action Plans and relevant Council conclusions and international conventions.

The Regulation further integrates gender and gender mainstreaming across some of the key articles including:

- Article 3 detailing the Specific Objectives of the facility includes:

“promoting gender equality, gender mainstreaming and the empowerment of women and girls, non-discrimination and tolerance, to ensure and strengthen respect for the rights of persons belonging to minorities, including national minorities and Roma, as well as rights of lesbian, gay, bisexual, transgender and intersex persons.”

19 Regulation (EU) 2024/1449 of the European Parliament and of the Council of 14 May 2024 on establishing the Reform and Growth Facility for the Western Balkans, P. 9

20 Ibid. n.12 of Preamble.

- Article 4 establishing the General Principles for the functioning of the Facility indicates that:

“Activities under the Facility shall mainstream and promote democracy, human rights and gender equality, progressively align with the social, climate and environmental standards of the Union”

and

“Beneficiaries and the Commission shall ensure that gender equality, gender mainstreaming and the integration of a gender perspective are taken into account and promoted throughout the preparation of the Reform Agendas and the implementation of the Facility. Beneficiaries and the Commission shall take appropriate steps to prevent any discrimination based upon gender, racial or ethnic origin, religion or belief, disability, age or sexual orientation. The Commission shall report on these measures in the context of its regular reporting under the Gender Action Plans.”

- Article 13 specifying the content of the Reform Agendas to be developed by the national governments includes, among others:

“an explanation of the extent to which the measures are expected to contribute to gender equality and the empowerment of women and girls, and the promotion of women and girls’ rights;”

All in all, **the Regulation establishes a strong legal foundation to ensure that the new financial instrument paves the way for the adoption and implementation of reforms to improve gender equality standards across the region.** It also clearly requires from Beneficiaries to integrate gender perspectives both in the preparation and the implementation of the Facility. But how have national Reform Agendas prioritised gender equality reforms vis-à-vis other reforms?



Where is gender in National Reform Agendas?

The development of national Reform Agendas is a key requirement under the Growth Plan and the responsibility of national governments. With the exception of Bosnia and Herzegovina²¹, all national Reform Agendas were presented to the European Commission in summer 2024 and approved in October 2024. These Reform Agendas will serve as a basis for fund allocation under the Growth Facility.

The following section looks at the national Reform Agendas and the extent to which they include key reforms related to gender equality and are gender mainstreamed. First it analyses the adopted Reform Agendas looking at their main objectives and identifying key reforms related to gender equality, then it focuses on the consultations held between governments and civil society organisations in preparation for the Reform Agendas.



"Evropska Kuća"/Europe House,
Belgrade, Serbia
Photo: Sandra Mandić

²¹ Political leaders in Bosnia and Herzegovina finally reached an agreement on the Reform Agenda on 30th September 2025, following the decision by the EC in July 2025 to cut the funds available for BiH by 10% due to the delays in submitting the final document. However, the adopted Agenda is not publicly available and therefore its analysis could not be included.

Albania

Albania's Reform Agenda²² has five main objectives: 1) Enhancing national economic competitiveness and governance, 2) Transforming education to foster a skilled and digital ready workforce, 3) Building a secure, resilient, and accessible digital nation, 4) Advancing energy sustainability and market integration, and 5) Enhancing rule of law and fundamental rights.

The **section on gender mainstreaming highlights existing legislation on gender equality**, including the current Law on Gender Equality and the National Strategy for Gender Equality 2021–2030 and it praises the current government's progress in advancing women's participation in decision-making, **but fails to include a situation analysis and identify critical shortcomings where Albania needs to improve**. It fails to mention that the latest EC Country Report on Albania assessed the performance on gender equality as rather weak "The legal and institutional framework for gender equality is partially aligned with the EU acquis and European standards. Weaknesses remain in implementing the National Strategy for Gender Equality 2021–2030 and its Action Plan, which focus on overlapping forms of discrimination and vulnerability. Women living in rural and remote areas, Roma and Egyptian women and LGBTIQ+ individuals face limited access to primary healthcare and to sexual and reproductive healthcare services."²³

Measure adopted under the **Human Capital** policy area are supposed to contribute to gender equality, especially in relation to education and employment. Specifically, the Reform Agenda seeks to ensure a fair representation of females in the number of graduates from Vocational and Educational Training (VET) schools and to facilitate employment of unemployed individuals with a focus on women and vulnerable groups. **At a closer look however, these reforms do not specifically target women or vulnerable groups, the only commitment concerns the collection of sex-disaggregated data during their implementation.** Albanian women's organisations interviewed for the study

highlighted that the reform to update the curricula in primary and secondary education does not take into account any gender disparities in education. Similarly, the reform to promote digital inclusion, enhance educational quality, and support the development of a skilled workforce ready for the digital economy, does not specifically account for unequal access to digital services. Women's organisations stress that it is crucial to ensure that reforms in the education sector and digitalisation are based on comprehensive gender analysis and are aimed to address unequal access to digital tools as well as persistent gender disparities in education, to avoid reproducing structural inequalities.

In relation to the **labour market, targeted measures are designed to address women's and vulnerable groups' unemployment including through employment promotion programmes**. However, there is no mentioning of the need to update Albanian legislation in the line with the EU acquis and to harmonise it with the Work-Life Balance Directive, which women's organisations believe is a key priority to address the gender gap in labour.

Other specific references are included under the **Private Sector Development and Business Environment** policy area which aims to enhance women's access to finance through grant schemes and by direct support to SMEs and start-ups owned by women.

Under the **Digitalisation** policy area there are a number of initiatives to provide and enhance access to digital services and facilitate interactions between citizens, businesses and government entities, such as the introduction of the digital Wallet. While the Reform Agenda acknowledges existing challenges in Albania such as limited internet connectivity in rural areas, cybersecurity threats, and the digital divide among different demographic groups, the RA only foresees the adoption of a gender-sensitive monitoring of implementation of the digital e-Wallet. Women's organisations stress that the RA should go beyond monitoring and adopt pro-active measures to

²² Albania's National Reform Agenda accessed at https://enlargement.ec.europa.eu/commission-implementing-decision-approving-reform-agendas-and-multiannual-work-programme-under_en

²³ Page 39, European Commission, Albania Country Report 2024

address the digital divide and ensure safe access to digital tools to different segments of the population.

Under the **Fundamentals and Rule of Law pillar, the commitments are even less geared to specifically address gender inequalities.**

There is no specific attention to further align the Albanian legislation with the EU acquis or international standards in relation to gender equality and gender-based violence, as the main reforms are designed to enhance freedom of expression and access to information by citizens, curb corruption and organised crime, human trafficking and exploitation. The RA also mentions that a fair and transparent judicial system is crucial to protect the rights of women and girls and hold perpetrators of gender-based violence accountable, but it remains unclear what specific measure is designed to achieve this goal.

Despite this, the assessment of the EC on the integration of gender equality commitments across the Reform Agendas is very positive, suggesting that “By promoting a reinforcement in the implementation of relevant legislation, the Reform Agenda contributes to the progressive

alignment of Albania with EU Acquis and relevant international standards promoting Gender Equality and the eradication of Gender Based Violence and Domestic Violence, furthermore following the principles established by the Gender Action Plan III.”²⁴

Besides minor actions included in the mentioned policy areas which may indirectly contribute to gender equality, no major fundamental reforms are foreseen to address structural discrimination of women across different policy areas. Women’s rights organisations in Albania already noted the difficulty to advance in concrete policy areas without providing general social protection and welfare to girls and women in the country. The absence of adequate social protection limits girls’, women’s and marginalised groups’ well-being, social inclusion and empowerment. Women’s organisations have also criticised among other things the failure to consider gender in relation to a safe digital environment, especially in a country where online violence, sexual assault and hate speech are rampant and threaten women’s participation online, as well as their offline safety.

Kosovo²⁵

Kosovo’s Reform Agenda²⁶ includes some specific actions aimed at addressing structural discrimination of women in society, suggesting that the agenda was developed based on a more robust gender analysis. **Specific gender-sensitive measures are integrated across four key policy areas namely, Fundamental Rights and Rule of Law, Public Administration Reform, Human Capital Development and Private Sector Development and Business Development.**

Under the **Fundamental Rights and Rule of Law** policy area, the government proposes to strengthen the implementation of the legislative

and strategic framework on the protection against domestic and gender-based violence and on the rights of the non-majority communities, contributing to equal access to information, justice and rights. Among the specific measures foreseen, Kosovo will improve punishment in judicial cases of domestic violence and increase the use of protection orders issued by judges in order to strengthen the rights of victims/survivors.²⁷ In addition, it commits to develop the Kosovo Gender Equality Program, the whole-of-government effort to advance gender equity and equality for all in Kosovo, and to draft the regulatory framework for gender-budgeting.

24 Commission Staff Working Document accompanying the Commission Implementing Decision approving the Reform Agendas and the multi-annual Work Programme under the Reform and Growth Facility for the Western Balkans – Albania SWD(2024)242 final.

25 Currently the disbursement of funding to Kosovo under the Growth Plan is on hold due to the lack of new institutions since the 9th February elections. Kosovo remains eligible to receive financing once the Agreements are ratified by the Parliament.

26 Kosovo National Reform Agenda (2024)

27 See specific measures adopted at page 87 of the Kosovo National Reform Agenda.

The Kosovo Reform Agenda also identifies gender disparities in education and the labour market as a key obstacle to economic growth and includes under the **Human Capital Development and Retention** policy area, a commitment to dedicate up to 50% of active labour market measures to target women, youth, people with disabilities, those living in rural areas and minority groups. This is designed to complement actions already funded under the IPA III to strengthen economic opportunities for young women and men through improved vocational education and training for young women and men. In addition, several reforms under the Human Capital policy area foresee the use and collection of sex-disaggregated data.

However, Kosovo's Reform Agenda fails to acknowledge that the current Labour Law is out of date²⁸ and lacks provisions to ensure adequate protection of workers, including of pregnant women, as well as other provisions to ensure equality between women and men in the labour market (such as paternity leave and others) contributing to existing discrimination. Women CSOs²⁹ highlight that

without the adoption of the Labour Law in line with EU Work-Life Balance Directive, something that has been pending for several years now, the impact of any of the propositions on labour and employment in the Reform Agenda will be limited.

In the area of **Private Sector Development**, the Reform Agenda commits to enhance women's access to financing through the Kosovo Credit Guarantee Funds and by supporting SMEs and start-ups led by women.

While gender perspectives are included in some key areas under the Kosovo Reform Agenda, they are missing from the **Green and Digital Transition**³⁰, fight against organised crime and others. Despite this, the EC's assessment of the inclusion of gender equality in Kosovo's Reform Agenda is positive.³¹ Overall, women's rights organisations in Kosovo observe a rather narrow gender perspective in the national Reform Agenda, recognising however that it still goes beyond the EU's ambition as presented in the Growth Plan.³²

Montenegro

Montenegro's Reform Agenda³³ commits to implement reforms with the aim of promoting gender equality as a horizontal principle, contributing to the empowerment of women and girls and protection of women's and girls' rights in line with the EU Gender Action Plan (GAP III) and the UN Sustainable Development Goals. It further mentions which reform would directly or indirectly contribute to furthering equality in Montenegro.

Montenegro's Reform Agenda recognises that women face structural barriers when it comes to equal participation in the labour market, including the burden of care of elderly, children and persons with disabilities which primarily falls on women. In the policy area of **Employability and Social Services**, it commits to analyse the socio-economic barriers as well as structural characteristics of unemployed women to be

28 Arian Lumezi (29.11.2023). Outdated Labor law. <https://kosovotwopointzero.com/en/outdated-labor-law/>

29 Kosovo Women's Network (2024). A Gender Review of the EU Growth Plan: The Reform Agenda of Kosovo.

30 Key recommendations on gender equality and digitalisation in Kosovo are included in Gender Equality at the center of IT and Beyond (2024) by Kosova Women's Network.

31 Commission Staff Working Document SWD(2024) 242 final Kosovo. Accompanying the document. Commission Implementing Decision approving the Reform Agendas and the multiannual work programme under the Reform and Growth Facility for the Western Balkans.

32 Kosovo Women's Network (2024). A Gender Review of the EU Growth Plan: The Reform Agenda of Kosovo.

33 Montenegro Reform Agenda 2024–2027, accessed at https://enlargement.ec.europa.eu/commission-implementing-decision-approving-reform-agendas-and-multiannual-work-programme-under_en

able to develop targeted programmes aiming at increasing unemployed women's participation in the labour market. This would be done through the development of an ad hoc methodology that targets gender equality in line with European Social Fund+ (ESF+) requirements. It further commits to fund pre-school child-care facilities and train professionals who will be employed in these facilities to address one of the key barriers to women's employment.³⁴

Furthermore, in the policy area of **Employability and Social Services** the Reform Agenda includes specific labour market activation measures that are supposed to target women by at least 50% and proposes to revise the Law on Social and Child Protection and to adopt a proposal for the Law on Unified Disability Assessment. Other measures are also meant to contribute to increasing women's participation in the labour market.

Under the **Education and Skills Development** policy area, specific measures are included to increase the construction of new facilities for pre-school children and ensure greater quality, access to and inclusivity of education across the different levels of schooling. Among the measures introduced, one is directly aimed at increasing the completion of cycles of primary and secondary education by Roma and Egyptian girls and boys and their access to pre-school facilities.

The **Fundamental Rights** policy area recognises that, despite the legal framework in place, domestic violence persists in Montenegro coupled with lenient penal policy. Based also on the recommendations by the EC in its latest Country Report and on recommendations directly sent by women's CSOs, the Reform Agenda commits to, among others, develop and adopt standard operating procedures for the prosecution of sexual and gender-based

violence cases, in line with relevant articles of the Istanbul Convention and the EU Victims' Rights Directive and to deliver on the recommendations of the Group of Experts on Action Against Violence Against Women and Domestic Violence (GREVIO) to establish three crisis centers for victims of sexual violence in line with the Istanbul Convention. In relation to the **Rule of Law**, reforms will address the judiciary, fight against corruption and organised crime, freedom of expression and media.

The policy area of **Green Transition** includes the implementation of the National Energy and Climate Plan and of the Just Transition Action Plan. Among the steps, a number include specific sex-disaggregated indicators. For instance, it aims to train at least 400 people out of which 15% are women, under the scheme for retraining and re-employment focusing on the implementation of comprehensive programme and at least 100 people of which 15% women retrained on the Action Plan.

The policy areas of **Business Environment and Private Sector Development** and the **Digital Transition** ones are completely gender-blind, despite recommendations by women's CSOs. There is no analysis concerning gender disparities in the access to digital services or how new technologies can specifically harm women through online violence and hate speech. It will be key to ensure gender-specific issues are included in the reforms and that safe access to digital services is ensured to different groups in society.

Women CSOs consulted for the Reform Agenda proposed the inclusion of more tangible indicators³⁵ to properly include women as well as vulnerable groups in the evaluation and monitoring process to ensure that their needs are duly taken into account in the implementation phase.

³⁴ Ibid. Page 84.

³⁵ Regarding the Reform 4.4.2 Effective implementation of the Law on Protection of Equality and Prohibition of Discrimination, Women's Rights Center suggested a list of indicators: 1. Prepared recommendations for all state and local authorities to adopt protocols on the prohibition of gender-based discrimination and protection against sexual harassment; 2. Adopted acts obliging all state enterprises to adopt protocols; 3. Make recommendations for private companies to adopt protocols; 4. Number of trained officials on discrimination recognition and protection mechanisms; 5. Number of adopted protocols at the level of state bodies and public enterprises on the prohibition of gender-based discrimination and protection against sexual harassment; 6. Number of cases before the courts and the Ombudsperson that are handled on the basis of discrimination; 7. Number of resolved cases according to the Ombudsman's conclusions related to cases of discrimination; 8. The number of particularly vulnerable groups that have direct benefits from affirmative measures that reduce discrimination (eg PWDs and employment); 9. % of budget funds intended for the implementation of measures for anti-discriminatory policies. Only 6 and 7 were combined and included in the RA.

North Macedonia

North Macedonia's Reform Agenda³⁶ includes five priority areas: 1) Governance, Public Administration Reform (PAR) Public Financial Management (PFM); 2) Energy and Digital Transition; 3) Human Capital; 4) Private Sector Development and Business Environment and 5) Fundamentals and Rule of Law. Under these priority areas there are 37 reforms and 136 measures to be implemented between December 2024 and August 2027.

Overall, the gender mainstreaming section suggests that North Macedonia is well advanced in terms of gender equality legislation and its implementation. However, while North Macedonia has built a solid legislative framework for gender equality over the past two decades, the 2024 EC Country Report highlights that recently **“North Macedonia has made no progress on advancing gender equality, with no significant developments in its national policy framework for integrating gender equality and aligning with the EU acquis”**.³⁷ The draft Law on Gender Equality has been pending for years as has the Labour Law, the anti-gender movement has been gaining traction and blocking the adoption of key legislation and the implementation of the Strategy on Gender Equality and its Action Plan is poor. The implementation of the legal framework for prevention and protection against GBV against women and domestic violence remains underfunded and the systemic weaknesses are still present.

The only concrete actions are included under the **Human Capital** Policy area. Here, the Reform Agenda promises that special emphasis be placed on increasing the participation of women in the labour market through developed programmes that are adapted to their specific needs and potential. By expanding the capacity for education and training, it is possible for women to achieve greater economic independence and social equality. **However, without a comprehensive**

legislative and policy framework tackling the structural causes of women's inequality, including aligning the legislation with the EU Work-Life Balance Directive, progress will remain limited. Moreover, such a framework is urgently needed to counterbalance the growing influence of anti-gender movements, which threaten to roll back hard-won gains on gender equality and undermine public support for EU-aligned reforms.

In the gender mainstreaming section in relation to **Green and Digital Transition**, the Reform Agenda acknowledges that the crises and shocks in recent years threaten to create new challenges and reverse progress achieved on women's rights and gender equality. The Reform Agenda foresees the revision and implementation of the National Energy and Climate Plan (NECP) and the implementation of the Just Transition Roadmap, developed together with the EU Delegation. The NECP also assesses the vulnerabilities and opportunities associated with climate change impacts, energy transition challenges, and socioeconomic disparities, which will be used as a guidance for the development of strategies and measures to address vulnerabilities and capitalize on opportunities in a just and equitable manner. It will be key therefore to closely monitor the implementation of the NECP and the Just Transition Roadmap to ensure that the needs and impacts on women, girls and different groups are duly accounted for.³⁸

In the area of **Digital Transition**, the Reform Agenda acknowledges the potential key role of digital transformations in reducing the gender gap in employment and poverty. However, when detailing specific measures and reforms, there are no measures targeting women and marginalised groups specifically. The Reform Agenda commits to aligning the national legislation with the EU acquis including the EU Digital Identity Regulation and others. While there is no specific reference

36 North Macedonia Reform Agenda accessed at https://enlargement.ec.europa.eu/commission-staff-working-document-north-macedonia_en

37 North Macedonia Country Report, European Commission (2024)

38 See for example recommendations in the report Energy Prices and Subsidies in the Western Balkans: Reforms for a Fair and Green Future, OECD (2025).

to gender issues in the digital sphere this reform should also ensure alignment with the new EU Directive on violence against women³⁹ and specific attention should be paid to ensure that the proposed reforms will contribute to furthering gender equality.

In relation to the area of **Fundamental Rights**, the Reform Agenda fails to prioritise the adoption of the Law on Gender Equality, as noted also by the EC in its assessment.⁴⁰ In its chapter on gender mainstreaming, it briefly mentions the fight against gender-based violence however none of the reforms proposed, including that to improve judicial integrity, specifically address the issue of judicial handling of cases of domestic and gender-based violence. Legislative changes to allow cases of gender-based violence to be processed *ex officio* by state institutions should be introduced as well as measures to ensure timely and impartial

protection of victims (which for example is specifically included in Kosovo's Reform Agenda).

Despite including limited measures aimed at addressing the gender gaps, North Macedonia's Reform Agenda is not designed to address any structural discrimination faced by women in society. Crucially, it does neither include commitments to adopt long-pending legislation on Gender Equality, despite repeated calls by the EC, nor does it provide a basis for aligning the legislation with the EU Acquis, including the Work-Life Balance Directive and the Directive on Violence against Women and Domestic Violence. Women CSOs in North Macedonia already voiced concerns about the limited attention to gender equality across the Reform Agenda and warn that without concrete commitments and measurable targets, gender mainstreaming will remain just hollow words.

Serbia

Serbia's Reform Agenda⁴¹ was adopted in October 2024. It should be noted that the adoption of the Reform Agenda pre-dates the widespread anti-government and anti-corruption protests which followed the collapse of the railway station canopy in the northern city of Novi Sad killing 16 people in November 2024. Since then, the government and police forces responded with intimidation, disproportionate use of force and detention of protesters, crackdown on civil society, professional journalists, media outlets, teachers and students, who have been labelled as "terrorists", "foreign mercenaries" and "anti-Serb". Under the current climate, leading CSOs have suspended cooperation with government bodies, including in relation to the EU accession process.

The **gender mainstreaming section** of Serbia's Reform Agenda provides an overview of existing legislation on gender equality and persisting challenges in Serbia. It further attempts to explain how the reforms introduced under different policy areas may directly or indirectly help to

address gender inequalities. However, it fails to acknowledge that the very Law on Gender Equality was suspended by a decision of the Constitutional Court in June 2024, creating legal uncertainty and raising concerns about the possible regression on safeguards for women's and girls' rights.

Under the Area of **Fundamentals**, Serbia's Reform Agenda includes a number of measures to enhance gender equality. However, it should be noted, most of the reforms under this area are not new and were already included in the existing Revised Action Plan for Chapters 23 and 24 but failed to be adopted by 2022. On gender-based violence, the Reform Agenda commits to further aligning the legal framework of the system of prevention and protection against gender-based violence with the international standards and the EU Acquis through the adoption of the Action Plan on Gender-Based Violence 2024-2025, the preparation of a Law on the Prevention of Domestic Violence to be adopted by the end of 2025 and the development of a gender-

39 Directive (EU) 2024/1385 of the European Parliament and of the Council of 14 May 2024 on combating violence against women and domestic violence

40 Commission Staff Working Document North Macedonia SWD(2024)244 Final, page 19.

41 Serbia National Reform Agenda accessed at https://enlargement.ec.europa.eu/commission-implementing-decision-approving-reform-agendas-and-multiannual-work-programme-under_en

responsive system of support services for victims of violence. The system of support services for victims of gender-based violence was regulated in the Law on Gender Equality, which was suspended by a decision of the Constitutional Court (July 2024). The Minister without portfolio responsible for gender equality and violence against women established a working group for amendments to the Law on the Prevention of Domestic Violence (the process is ongoing). There are currently no representatives of women's organizations in the Working Group. With civil society organisations boycotting participation in working groups with government representatives, it is hard to imagine how these laws and measures can be adopted in a consultative manner.

Other measures proposed under the **Fundamentals** concern the protection of the rights of minorities living in Serbia, through the adoption of the Action Plan on Minority Rights and the Action Plan on deinstitutionalisation. However, CSOs report that the last Action Plan on Social Inclusion of Roma expired in 2024 and there is currently no information about the launch of a new one.

Furthermore, the **Reform Agenda commits to enhance freedom of expression**, by amending the laws on electronic media and on public information and media to align with the EU acquis and European standards and by adopting the Law on Public Information and Media and ensure its implementation. It should be noted also in this respect, that while the Reform Agenda commits to enhancing media freedom, attacks on professional journalists and media workers have been on the rise since the beginning of the anti-government protests. The Law on Amendments to the Law on Public Information and Media and the Law on Amendments to the Law on Public Service Broadcasters were adopted in June 2025. However, according to media experts, the adoption followed a non-transparent process without adequate public discussion in an accelerated procedure.⁴² When it comes to the regulatory body for electronic media, it has not existed since November 2024, and two attempts to elect new members of the body failed due to the obstruction of the ruling majority in the parliament and in the Working Group on these issues.

Finally, there is also a reference to the planned adoption of the new Law on Suppression and Prevention of Human Trafficking and the fact that most of the victims are women and minors who are exposed to different forms of exploitation, including in particular sexual exploitation, forced marriages and forced labour.

Under the **Human Capital** policy area, sub-area labour, the Reform Agenda commits to adopt the Law on Traineeship in line with EU standards and to implement the Youth Guarantee with specific targets for women.⁴³ Under the sub-area education and skills, the Reform Agenda sets to incentivise the development of pre-school education in line with the Strategy for the Development of Education which identifies lacking infrastructure and professionals as key gaps. Other gender-specific targets are included under the reform to step up the VET and strengthening adult education, training and upskilling.

None of the specific reforms planned under the **Business Environment and Private Sector Development** specifically take into account the position of women and men. For example, the reform of the agriculture sector despite recognising that family farms have the largest participation in food production, does not include a specific measure to ensure that the planned reforms take into account the position of women in the agriculture sector and does not pose a risk to women's and communities' livelihoods.

Similarly, the proposed reforms under the **Green Transition** policy area do not articulate how gender-specific dimensions will be tackled. The gender mainstreaming section of the Reform Agenda affirms that "women are at a greater risk of energy poverty. Energy poverty has serious implications for health, quality of life and social inclusion of socially vulnerable population groups. It is connected to the risk of poverty in general and contributes to inequalities in society."⁴⁴ The Reform Agenda commits to develop the Just Transition Action Plan which is set to include an analysis of the social, economic and environmental impact of such transition and introduce measures to address them. It will be important to ensure that its development and implementation include a strong gender dimension.

42 More information at <https://europeanwesternbalkans.rs/sta-je-sporno-u-predlozenim-izmenama-medijskih-zakona/> and Monitoring Media Pluralism in the European Union, Results of the MPM 2025, Country Report Serbia European University Institute (2025).

43 Page 86 of Serbia Reform Agenda.

44 Ibid.

In the area of **Digitalisation**, the Reform Agenda affirms that “reforms in the area of digitalisation will help reduce the gender gap in the economy” and that “Electronic communications, digital platforms, and digital financial services offer advanced opportunities and can help close the digital gender divide.”⁴⁵ One reform is directly aimed at improving digital literacy and providing access to digital technologies to adults in more than 50 municipalities in Serbia. While there is no specific target for women, it is stated that the reform will promote inclusion by ensuring that digital opportunities are accessible to marginalized and rural populations.

All in all, while Serbia’s Reform Agenda proposes the adoption of numerous reforms and laws

under the area of fundamental rights and human capital, **most of the measures are neither new nor are they commensurate to the scale of the issues they are supposed to address. Also, with the current suspension of the Law on Gender Equality, it remains unclear how key guarantees for equal rights will be upheld.** Furthermore, the backdrop of the large civic protests taking place in Serbia and the current suspension of cooperation between government bodies and civil society hinder the process of implementing the Reform Agenda in a meaningful way. It remains to be seen how the EU will put in practice the principle of conditionality for the release of funds in relation to fundamental rights and freedom of expression.

Comparative assessment

Overall, **there is no single approach to the gender mainstreaming of Reform Agendas.** While some include a situation analysis touching upon different policy areas and highlighting gender disparities that require specific attention, for instance the Reform Agenda for Kosovo and Montenegro, others don’t. All Reform Agendas include a specific gender mainstreaming section, but most tend to include an overview of the current legislative and policy framework within the respective country while failing to specifically provide an explanation of the extent to which the measures are expected to contribute to gender equality and the empowerment of women and girls, and the promotion of women and girls’ rights, as requested by the Regulation.

In most cases, **a fully-fledged gender-mainstreaming approach based on the different needs, priorities and experiences of diverse women and men, LGBTQI+ and marginalised groups and spanning across all the policy areas is missing.** Also, often there is an underlying assumption that reforms under the areas of Digitalisation and Green Transition will automatically benefit also women and marginalised groups by creating new job opportunities and ensuring greater and safe access to digital services. This assumption does not stand the test of reality. Reforms will have to be accompanied by ex-ante impact assessments to ensure that different groups can equally benefit from them.

The **Human Capital policy** area tends to be the one where specific measures and reforms targeting women, girls and vulnerable groups are included, especially in relation to education and employment, social services and VET. In particular, **the North Macedonia and Kosovo Reform Agendas introduce specific measures to reinforce the education system to address the skill mismatch, increase the access to and quality of VET and improve labour market conditions for women and girls.** Interestingly though, ambitious commitments to align the legislation with the EU Work-Life Balance Directive are missing, despite clear indications by women’s civil society organisations that this would be a pre-condition for a healthy labour market.

The Serbia and Kosovo Reform Agendas specifically propose reforms under the **Fundamental Rights** area in relation to addressing gender-based violence, developing gender-sensitive support systems for victims and strengthening the rights of minorities. However, while proposed reforms in Serbia’s Reform Agenda at first glance seem wide-ranging, the suspension of the Law on Gender Equality by the Constitutional Court in 2024 threatens to reverse most hard-won gains by creating legal uncertainty. In addition, most of the measures are not new (they were previously included in the Action Plans on Chapter 23 and 24) and their adoption is postponed regularly by the government.



In the area of **Green Transition, only Montenegro's Reform Agenda specifically introduces measures targeting women** while others, like North Macedonia and Serbia, mention the vulnerabilities and opportunities associated with climate change impacts, energy transition challenges and socioeconomic disparities, but then fail to introduce specific gender-sensitive measures. This will require close monitoring of the development and implementation of the Just Transition Roadmaps and connected plans to ensure attention to gender disparities.

The areas of **Business Environment and Private Sector Development and Digitalisation are, by and large, gender-blind**. There is neither specific analysis of existing structural disparities in the Private Sector development, nor specific measures aimed at women with the exception of the Kosovo Reform Agenda which includes a measure to enhance women's access to financing through the Kosovo Credit Guarantee Funds and to support SMEs and start-ups led by women. This potentially carries the risk of further deepening inequalities, especially in relation to digitalisation, if specific correction measures and a specific gender-sensitive monitoring and evaluation system is not in place.

It is worth mentioning that, **in the Gender Action Plan III⁴⁶ the green transition and digitalisation are key areas of engagement through the EU's external action**. It is therefore surprising that

specific attention to the disparities in accessing digital technologies, the potential risks carried by new technologies including gender biases and potential increase of online gender-based violence, and the gender dimension of climate change and environmental degradation are not specifically factored in in the Growth Plan and the connected Reform Agendas. With regards to the green transition, there is still potential to include these aspects as part of the Just Transition Plans that the countries will adopt as part of the implementation of the Reform Agendas.

While gender-sensitive reforms are included only to a limited extent in the Reform Agendas, the EC's assessment is generally positive. The EC generally praised the inclusion of gender considerations in the Reform Agendas rather than suggesting corrective measures or additional reforms that should be prioritised in line with the EU Acquis. Only the EC document endorsing North Macedonia Reform Agenda mentions that "further efforts are needed in mainstreaming gender equality in North Macedonia, including the adoption of the Law on Gender Equality", suggesting that the current Reform Agenda lacks specific measures to foster gender equality. **Overall, it seems that the EC should carry a much more in-depth appraisal of the proposed reforms and whether they are adequate to address existing gender disparities in the different countries.**

Consultations with civil society

National governments were expected to conduct public consultations prior to the finalisation of the reform agendas. According to the EC Regulation on the Growth Facility „**The Reform Agendas shall be prepared in an inclusive and transparent manner, in consultation with social partners and civil society organisations.**“⁴⁷ In not a single case however, women CSOs interviewed for the study described the process as fully transparent, predictable and inclusive.

In the case of **Albania**, the EU positively highlights the country's commitment to the “systematic involvement of relevant stakeholders” to ensure the inclusion of a gender perspective. However, women CSOs consulted for the study report to have had limited access to contribute to the Reform Agenda. Overall, in a strongly government-led process there has been limited space for other actors to contribute, particularly those representing marginalised groups, but also representatives from the parliamentary Council of European Integration. The parliament overall had



Staff member of AWEN,
Albania

“The absence of a formalised feedback loop means that civil society input remained invisible in the final Reform Agenda. Additionally marginalised groups (Roma, Egyptians, LGBTQI+, rural women and women with disabilities) were systematically left out of the consultation process.”

very limited possibilities for monitoring the entire process. A (digital) portal for consultations was opened during June 2024 for 28 days. Officially, the government stated to have organised several discussion meetings in preparation of the reform agenda, although it is unclear when these happened, who were invited and who took part.

In **Bosnia and Herzegovina** women CSOs interviewed for the study report that the process of preparing the Reform Agenda has been untransparent and non-accessible for CSOs. Bosnia and Herzegovina presented an agenda proposal to the EU on 30th April 2024. On 24th July 2024, consultation workshops with civil society were held, however without any transparency about the scope of these workshops or their results. Shortly afterwards it was announced that authorities had failed to agree on the Reform Agenda over political dispute. Political leaders in Bosnia and Herzegovina eventually reached an agreement on the Reform Agenda on 30th September 2025, following the decision by the EC in July 2025⁴⁸ to cut the funds available for BiH by 10% due to the delays in submitting the final document. Bosnia and Herzegovina so far has failed to make its Reform Agenda public, withholding its content from public scrutiny. On 15th October 2025, the House of Representatives of the Parliamentary Assembly of BiH during its 31st emergency session attempted to adopt conclusions obliging the Council of Ministers to submit the Reform Agenda to Parliament, but the initiative was blocked. Despite these concerns, the European Commission welcomed the submission of the Reform Agenda.

In **Kosovo**, during the preparation of the Reform Agenda, two consultations were held, albeit rather late in the process. Kosovo has an overall fairly well-established civil society consultation

⁴⁷ Art. 11 of Regulation (EU) 2024/1449 of the European Parliament and of the Council of 14 May 2024 on establishing the Reform and Growth Facility for the Western Balkans,

⁴⁸ See https://www.eeas.europa.eu/delegations/bosnia-and-herzegovina/cut-bosnia-and-herzegovina%E2%80%99s-allocation-under-growth-plan_en

mechanism on EU-related issues and it is generally open to consulting with women CSOs and integrating their input into policy documents. However, short time frames for approval of the Reform Agenda and delayed communication by the government clearly impacted the result of consultations with civil society. Currently, civil society organisations are concerned about the lack of information on when and whether the funding under the Growth Plan will be released as well as the other funds under IPA III which have been blocked by the “temporary and reversible measures” imposed on Kosovo in June 2023.

In the case of **Montenegro**, the European Commission notes that “The public consultations were carried out both in the form of a round table meeting with stakeholders and through a written procedure, with a good participation of public authorities, CSOs, non-governmental organisations, business community and academics. All comments received in the consultation have been considered and reflected in the Reform Agenda as far as possible.” Women’s civil society organisations report to have been consulted on two occasions and that 24% of the input provided was eventually included in the Reform Agenda. However, it should be noted that they stressed the importance of a transparent process and criticised the absence of a public report from the open debate on the text of the Reform Agenda.

In **North Macedonia**, tight deadlines (including providing just one weekend for input), poor predictability of the timeline and non-transparent communication by the government limited fruitful and meaningful involvement of women’s CSOs during the preparation of the Reform Agenda. A key issue raised by women’s CSOs has been

the complete lack of structured reporting (i.e. minutes or structured summary of consultations). The limited inclusion of gender perspectives in the Reform Agenda and the sparse measures to promote gender equality suggest that the input provided by women CSOs was not well received. Amidst a general regression in North Macedonia on issues related to the rights of women, LGBTQI+ and marginalised groups, also due to the rapid growth of the anti-gender movement, women CSOs observe that while the government pays lip services to gender equality issues it fails to take any concrete action. While the Council for Cooperation with CSOs was recently re-established, doubts remain about the government’s will to fully involve civil society in these processes.

In **Serbia**, the government published a timeframe of next steps accessible on the government’s website during the preparation of the Reform Agenda. In early 2024, the Ministry of European Integration had invited civil society for an “informative session” with poor turn-out. The informative session was officially considered as “consultation”. Civil society report that the text that was presented to them was effectively the final text and that no input was taken on board. Members of the Working Groups on the National Convention on the EU for Chapters 23 and 24 submitted detailed input to the Reform Agenda⁴⁹ the Government of Serbia and in a joint letter⁵⁰ deplored the absence of adequate and meaningful public debate on the preparation of the Reform Agenda. They also stressed the lack of measures to create an enabling environment for civil society organisations and to include them in the implementation and monitoring of the Reform Agenda.

Key issues concerning civil society consultations on the Reform Agendas:

- Short time frames for developing and approving the Reform Agendas
- Limited information on timelines
- Short windows of opportunity to prepare and provide inputs
- Info sessions later presented as consultations
- Absence of feedback loops and no public reports from consultations
- Limited involvement of marginalised groups



⁴⁹ Comments of the Working Groups of the National Convention on the EU on Chapter 23 and Chapter 24 on the Proposal of the Reform Agenda of the Republic of Serbia (2024).

⁵⁰ The letter was seen in preparation for this study but is not publicly available.

Monitoring and evaluation

The EC Regulation on the Growth Facility indicates that the Reform Agendas shall include the arrangements for the effective monitoring, reporting and evaluation by the beneficiary country, including the proposed measurable qualitative and quantitative steps and relevant

indicators set out in paragraph 2.⁵¹ Across the board, beneficiaries have not used a consistent approach to including qualitative and quantitative steps and indicators. Gender-sensitive indicators and steps are included only under some policy areas and generally are very sparse.



"Gender-based violence and security for women's rights defenders" – Women's Civil Society Sounding Board Meeting 2024, Belgrade, Serbia
Photo: Sandra Mandić

51 Article 13 of Regulation (EU) 2024/1449 of the European Parliament and of the Council of 14 May 2024 on establishing the Reform and Growth Facility for the Western Balkans.

There are however some positive examples, provided below:

Country	Policy area	Reform	Gender-sensitive indicators and steps
Kosovo	Fundamental Rights	Strengthen implementation of the legislative and strategic framework on the protection against domestic and gender-based violence	<i>Punishments for domestic violence are above the minimum legal threshold in at least 80% of cases; Number of final convictions related to domestic violence using the domestic relationship as an aggravating circumstance in 2026 increased by 40% (baseline 2023). June 2027</i>
Montenegro	Green Transition	Implementing National Energy and Climate Plan	<i>100 persons out of which 15% women are retrained under the action plan (pilot) – baseline December 2024</i> <i>At least 400 persons out of which 15% women trained under the scheme for retraining and re-employment focusing on implementation of comprehensive Programme as well as on other industry or service jobs. Baseline December 2024</i>
North Macedonia	Human Capital	Reinforce the education system to address the skill mismatch, increase the access to and quality of VET.	<i>3,000 students with at least 30% women in IVET benefit from exposure to work-based learning during their vocational education and training (by June 2027)</i> <i>Number of developed programmes in VET for validation of non-formal and informal learning: 16 of which 2 for women (one for female entrepreneurship) (by June 2027).</i> <i>Number of 500 adults with at least 30 % women who have been awarded qualifications based on the procedure for completed programmes with validation of non-formal and informal learning (by December 2027).</i>
Serbia	Human Capital	Improve labour market conditions including through ensuring adequate financial and institutional resources and capacities for activation in employment and social services	<i>30% of persons not in employment, education, or trainings (NEETs), out of which at least 50% of women, registered in the Youth Guarantee (by December 2027);</i> <i>30% of young people, out of which at least 50% of women and at least 3% of Roma, exit the Youth Guarantee into employment, continued education/training, an apprenticeship or a traineeship within four months of joining the Youth Guarantee program (by December 2027).</i>

Much of the potential benefit of reforms to women, girls and minorities could be lost if they are not paired with strong monitoring systems able to capture the impact of the reforms on different groups. Women's civil society organisations in the different countries

in the region put forward recommendations for gender-sensitive indicators to be included in the monitoring frameworks of the respective Reform Agendas but only a few were accepted. It would therefore be relevant to develop a gender-responsive standard for monitoring.

Conclusion

The study finds that **gender disparities are overlooked in the EU Communication on the Growth Plan**, both as a structural problem holding back economies in the region and as a critical area to be addressed to boost economic growth and foster a culture of equality and inclusion in the region. **However, the Regulation establishing the Growth Facility includes gender equality, gender mainstreaming and the empowerment of women and girls among the specific objectives** of the new financial instrument, laying a strong legal foundation for prioritising gender equality reforms in the Reform Agendas.

The analysis of the five Reform Agendas adopted by the countries in the region displays different approaches to gender mainstreaming and varying degrees of analysis of gender disparities across the different policy areas. Our study shows that **proposed reforms and measures are often insufficient to address the scale of current gender disparities across the policy areas and that critical reforms are left out**. Alignment with the EU Acquis on gender equality, especially crucial EU directives (Work-Life Balance Directive, Directive on Violence against Women and Domestic Violence, Victims' Rights Directive) is generally not mentioned.

Most gender-sensitive reforms are included under the areas of Human Capital, Education and Fundamental Rights but areas such as the Green and Digital Transition and the Business and Private Sector Development are often missing specific gender-sensitive priorities. Overall, while many Reform Agendas recognise the role that Digitalisation can play in reducing the gender

gap, they fail to identify specific measures to ensure equitable and safe access to digital tools. Similarly, most Reform Agendas mention the vulnerabilities and opportunities associated with climate change and energy transition but then fail to introduce specific gender-sensitive measures. The policy area of Private Sector Development and Business Environment generally overlooks gender disparities, with limited exceptions.

A key overarching issue relates to the general monitoring and evaluation of the implementation of the Reform Agendas. Shortcomings and challenges are to be expected in relation to the **lack of gender-responsive indicators and targets across many of the proposed reforms**.

The current lack of interest among Western Balkan governments to take gender equality concerns seriously poses a further challenge to the consideration, and prioritisation, of gender-responsive measures and indicators. In such a climate, the EU is strongly advised to attach special attention to gender-responsive monitoring, including (but not limited) to empowering the role and inclusion of women CSOs in the future monitoring and evaluation of the Growth Plan.

The Growth Plan could provide an opportunity for the EU to further advance fundamental reforms in the region, but reforms need clear political commitments and effective monitoring and evaluation systems in place. The EU needs to ensure that both are in place and should strongly promote inclusion of civil society organisations, including women CSOs in the process of implementing and monitoring the Reform Agendas.



"United for our Future" –
European Commission building, Brussels, Belgium
Photo: Johanna de Tessieres

Annex 1 – Methodology

The assessment is primarily desk research of publicly available documents such as the EU's New Growth Plan for the Western Balkans (2023), The Growth Facility (2024), EU communications on the issue and national reform agendas (translations), as well as reports prepared by women's and feminist CSOs and networks from the region, partners to The Kvinna till Kvinna Foundation. In addition, relevant opinion pieces and preliminary analysis by local organisations, think tanks and WCSOs were considered. Desk research was supported by semi-structured interviews with Kvinna till Kvinna partners in the respective countries who are experts on gender equality and women's rights. They were asked to provide feedback concerning their inclusion in the preparation of the reform agendas adopted by their national governments and on the content.

Interviewed organisations include: Albanian Women Empowerment Network, AWEN (Albania), Helsinki Citizens' Assembly (hCa) Banja Luka (BiH), United Women Banja Luka (BiH), Kosovar Gender Studies Centre (Kosovo), REACTOR – Research in Action (North Macedonia), The Association for Emancipation, Solidarity and Equality of Women, ESE (North Macedonia), ASTRA Anti-Trafficking Action (Serbia), YUCOM, Lawyers' Committee for Human Rights (Serbia).

Research was further supported by exchange with local experts on EU integration and the Growth Plan as well as a representative of the Regional Cooperation Council.



The assessment considered the following criteria to analyse the development of the Growth Plan:

1. Attention to gender equality (legislation, mechanisms and implementation) including potential barriers to achieving it (social norms, legislative, institutional barriers etc.) and to the rights of LGBTQ persons across relevant documents and communication
2. Visibility of commitment to gender mainstreaming
3. Reference to relevant EU policies and mechanisms supporting gender equality across relevant EU documents
4. Consideration of intersectionality including reference to Roma women, women of national minorities, women refugees and IDPs, women with different abilities, LGBTQ across relevant documents
5. The role of civil society, and especially women's organisations in the process of development and implementation of reform agendas
6. The availability of and reference to gender-conscious data and statistics

In the analyses of the respective national Reform Agendas the following criteria were considered:

- 1) The extent to which the National Reform Agenda has the potential to contribute to the alignment with the EU acquis on gender equality
- 2) The extent to which the National Reform Agenda is addressing structural discrimination of women and girls in society based on a solid gender analysis
- 3) The extent to which National Reform Agendas address long-standing recommendations pertaining to gender equality by the EU in the EC Country Reports
- 4) The extent to which different policy areas, including the green and digital transition, are gender mainstreamed



Women human rights defenders and Kvinna till Kvinna representatives
in front of the EU Parliament building – Brussels Advocacy Week 2025, Brussels, Belgium
Photo: Johanna de Tessieres

**For all women's rights,
in every corner of the world.**