

ALBANIA, BOSNIA AND HERZEGOVINA, KOSOVO, MOLDOVA,  
MONTENEGRO, NORTH MACEDONIA, SERBIA AND UKRAINE

# GENDER ANALYSIS OF THE 2025 EUROPEAN COMMISSION COUNTRY REPORTS FOR EU ACCESSION COUNTRIES





"Feminist Survival Kit" at the Kvinna till Kvinna Femdefenders networking event 2025, Skopje, North Macedonia  
Photo: Maja Janevska Ilieva

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AUTHOR: Giulia Pasquinelli

REFERENCE GROUP: Emilija Dimoska, Voskre Naumoska Ilieva, Anne Nemsitsveridze, Maida Omerćehajić, Tea Pokrajčić, Maja Stajčić, Ristin Thomasson, Sofija Vrbaški

DESIGN AND VISIBILITY COORDINATION: Emina Durmo

ACKNOWLEDGEMENTS: The Kvinna till Kvinna Foundation wishes to thank all of the partner organisations in the Western Balkans, Moldova and Ukraine who contributed to this publication with their insights and feedback. Particular thanks to Albanian Women's Empowerment Network (Albania), Helsinki Citizens' Assembly Banja Luka (Bosnia and Herzegovina), United Women Banja Luka (Bosnia and Herzegovina), Bolja Budućnost (Bosnia and Herzegovina), Transparency International Bosnia and Herzegovina, Kosovo Women's Network (Kosovo), Kosovar Gender Studies Center (Kosovo), REACTOR – Research in Action (North Macedonia), ESE – Association for Emancipation, Solidarity and Equality of Women (North Macedonia), Coalition Margins (North Macedonia), GENDERDOC-M (Moldova), Romni Roma Women's Platform (Moldova), Pisa (Moldova), Women's Rights Center (Montenegro), Fight for Right (Ukraine), Sphere (Ukraine), Autonomous Women's Centre (Serbia), Association of Women Sandglass (Serbia), ASTRA Anti-trafficking Action (Serbia), A 11 – Initiative for Economic and Social Rights (Serbia), Lawyers' Committee for Human Rights YUCOM (Serbia).

LAYOUT: Tijana Dinić

COVER PHOTO: Protesters at the International Women's Day Protests 2025, Skopje, North Macedonia  
Woman with the rose – Lea Rizaova (domasolea.com)

Photo: Maja Janevska Ilieva

The Kvinna till Kvinna Foundation, March 2026



This report is financed by the Swedish International Development Cooperation Agency (Sida). Sida does not necessarily agree with the opinions expressed. Kvinna till Kvinna is responsible for the content.

## THE KVINNA TILL KVINNA FOUNDATION

The Kvinna till Kvinna Foundation has defended women's rights since 1993.

For every woman'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 violence against women, reach lasting peace and close the gender gap once and for all.



Women's Civil Society Sounding Board Meeting with the EU Delegation to Serbia 2025, Belgrade, Serbia  
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# ACRONYMS

<b>BiH</b>	Bosnia and Herzegovina
<b>CEDAW</b>	Committee on the Elimination of Discrimination Against Women
<b>CLIP</b>	Country Level Implementation Plan (of GAP III)
<b>CRSV</b>	Conflict-related Sexual Violence
<b>CSO</b>	Civil society organisation
<b>DG ENEST</b>	Directorate for Enlargement and Eastern Neighbourhood
<b>EC</b>	European Commission
<b>ECHR</b>	European Court of Human Rights
<b>EEAS</b>	European External Action Service
<b>EIGE</b>	European Institute for Gender Equality
<b>EU</b>	European Union
<b>EUD</b>	European Union Delegation
<b>EUO</b>	European Union Office (Kosovo)
<b>FIMI</b>	Foreign Information Manipulation and Interference
<b>FRA</b>	Fundamental Rights Agency
<b>GAP III</b>	Joint Communication to the European Parliament and the Council: Gender Action Plan III – An Ambitious Agenda for Gender Equality and Women’s Empowerment in External Action 2021–2026
<b>GBV</b>	Gender-based violence
<b>GEWE</b>	Gender Equality and Women’s Empowerment
<b>GID</b>	Gender- and Identity-based Disinformation
<b>GREVIO</b>	Group of Experts on Action against Violence against Women and Domestic Violence
<b>IDP</b>	Internally displaced person
<b>ILO</b>	International Labour Organisation
<b>IPV</b>	Intimate Partner Violence
<b>Istanbul Convention</b>	Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence
<b>LGBTQI</b>	Lesbian, Gay, Bisexual, Trans, Queer and Intersex
<b>NAP</b>	National Action Plan
<b>NEET</b>	Not in Education, Employment or Training
<b>NGO</b>	Non-governmental organisation
<b>ODIHR</b>	Office for Democratic Institutions and Human Rights
<b>OSCE</b>	Organisation for Security and Cooperation in Europe
<b>SGBV</b>	Sexual and gender-based violence
<b>SLAPPS</b>	Strategic Lawsuits against Public Participation
<b>UNSCR 1325</b>	United Nations Security Council Resolution 1325
<b>UPR</b>	Universal Periodic Review
<b>USAID</b>	United States Agency for International Development
<b>VET</b>	Vocational Education and Training
<b>WHRDs</b>	Women Human Rights Defenders
<b>WPS</b>	Women, Peace and Security

# Glossary

The report uses the following definitions based on article 3 of the Istanbul Convention:

**Violence against women:** is understood as a violation of human rights and a form of discrimination against women and shall mean all acts of gender-based violence that result in, or are likely to result in, physical, sexual, psychological or economic harm or suffering to women, including threats of such acts, coercion or deprivation of liberty, whether occurring in public or in private life.

**Domestic violence:** shall mean all acts of physical, sexual, psychological or economic violence that occur within the family or domestic unit or between former or current spouses or partners, whether or not the perpetrator shares or has shared the same residence with the victim.

**Gender:** refers to the socially constructed roles, behaviours, activities and attributes that a given society considers appropriate for women and men.

**Gender-based violence against women:** shall mean violence that is directed against a woman because she is a woman, or that affects women disproportionately.

**Gender-mainstreaming<sup>1</sup>:** the systematic consideration of the differences between the conditions, situations and needs of women and men in all policies and actions.



Rights message badges at the Femdefenders 2025 networking event, Skopje, North Macedonia  
Photo: Maja Janevska Ilieva

# Executive summary

The European Union (EU) accession process continues to be a key window of opportunity for countries aspiring to become EU member states to strengthen their laws, policies and practices on gender equality. The founding principle of gender equality, enshrined in the EU Treaties, is embedded in the accession methodology and in the EU *acquis communautaire*, yet in practice it is often considered a secondary issue with limited impact on the economic, political and security dimensions of accession. This approach fails to acknowledge that gender equality, as a vital component of democratic societies, intersects with all dimensions of change, including social, political, economic and cultural and, as such, can influence and shape those changes in ways that are often underestimated or ignored.

Gender equality is a litmus test for democracy. For this reason, The Kvinna till Kvinna Foundation decided to focus on gender equality throughout the EU accession process, including in the European Commission (EC) Country Reports, the key policy tool assessing progress in meeting the Copenhagen criteria<sup>2</sup> and recommending steps forward. This is the eighth Gender Analysis of EC Country Reports for the Western Balkans and the first one including also Moldova and Ukraine since their application for EU membership.

This year's analysis shows that, while there are some improvements in the gender-mainstreaming of the Country Reports, analysis of gender equality issues continues to be mainly confined to the fundamental rights section and the Social Policy and Employment chapter. While these are key parts of the report, they are not sufficient to highlight the multiple intersections between gender and other economic, political, social, environmental and security issues that are part and parcel of the EU accession process. Several key chapters continue to be gender-

blind, including Chapter 10 (Information society and media), Chapter 11 (Agriculture and rural development), Chapter 18 (Statistics), Chapter 25 (Science and Research), Chapter 26 (Education and Culture), Chapter 27 (Environment and Climate Change), among others.

Key issues to highlight for the 2025 Country Reports:

## Anti-gender Narratives and Democratic Backsliding

The connection between gender equality and key trends and developments in EU accession countries are often missed. The growing anti-gender and anti-rights narratives in Western Balkan countries are not analysed in connection with an erosion of democratic principles and restriction of civic space, which is evident in Bosnia and Herzegovina (BiH), Montenegro, North Macedonia and Serbia. It is not a coincidence that in these countries, key legislation protecting and promoting gender equality is either being dismantled or its adoption delayed. This is part of a concerted tactic to erode civic rights, weaken women's roles in society and maintain a grip on power catering to different conservative constituencies. For instance, harmful narratives about women's rights CSOs and feminism are used widely in Serbia to portray gender equality as an ideology imported from 'the West' and seeking to erode traditional Serbian values. The suspension of the Gender Equality Law in Serbia due to the challenging of its constitutionality by the Ombudsman in 2024 and the stalemate on the Law on Same-Sex Partnerships is part of this discourse. Similar patterns are taking place in BiH, Montenegro and North Macedonia. Women's rights CSOs have systematically warned about the connection between the weakening of legal guarantees for women's and LGBTQI rights and the backsliding in the democratic system.

<sup>2</sup> The Copenhagen criteria were established in 1993: They are: stability of institutions guaranteeing democracy, the rule of law, human rights and respect for and protection of minorities; a functioning market economy and the ability to cope with competitive pressure and market forces within the EU; the ability to take on the obligations of membership, including the capacity to effectively implement the rules, standards and policies that make up the body of EU law (the '*acquis*'), and adherence to the aims of political, economic and monetary union.



WHRDs at the Brussels Advocacy Week 2025, Brussels, Belgium  
Photo: Johanna de Tessieres

### Foreign Information Manipulation and Interference and Gender-based Disinformation

Foreign information manipulation and interference (FIMI) is a growing issue across accession countries, with Russia's interference in elections being one of the key concerns. However, Country Reports fail to link gender- and identity-based disinformation (GID) to FIMI. The Moldova Report acknowledges that some political actors and the Moldovan Orthodox Church continue to be vocal against the LGBTQI community. Also, it stresses that Russian-affiliated local media propagate misinformation and targeted online disinformation campaigns have multiplied. However, the Report makes no reference to how harmful homophobic narratives stigmatising LGBTQI people were used in the context of the 2024 presidential election campaigns as political tools to garner votes and polarise public opinion. The EC should further acknowledge this connection and ensure that the tools and strategies it deploys on FIMI in accession countries are fit to address this critical dimension.

### Women's Political Participation

While the issue of women's political participation is addressed more thoroughly in the Country Reports, usually it is limited to an overview of the legislative framework and measures in place, such as the existence of quotas. While most countries have adopted quotas, these measures alone are not sufficient to ensure equal and meaningful participation of women in politics, especially where party politics and structures are still dominated by a patriarchal culture. Only the Kosovo Report analyses the structural barriers holding back women's political participation including male dominance in campaign spaces, limited media exposure, fewer campaign resources and a political discourse often marred by misogynistic rhetoric and personal attacks. The Report clearly indicates that, despite quotas and legal commitments, persisting patriarchal norms dominating party politics and public life constrain women's participation and influence in Kosovo politics. This is the case for most countries, but other Country Reports fail to mention it and issue recommendations in this respect.

## Sexual and Gender-based Violence

Domestic violence continues to be a key issue addressed by the Country Reports, though often confined to the fundamental rights sections. Country Reports have yet to recognise that gender-based violence (GBV) is not a private matter but a societal problem rooted in structural inequality affecting social structures, economic stability and political participation which requires a systemic and coordinated response by different stakeholders and institutions.<sup>3</sup> But there is some progress this year in how Country Reports address the issue. The Kosovo and North Macedonia Reports mention the capacities of judges and prosecutors in handling cases of gender-based violence, noting that there are systemic challenges in handling these cases linked to inefficient prosecution, deficient indictments and inconsistency in sentencing. The BiH Report for the first time points at the need for multi-sectoral response mechanisms for victims/survivors of gender-based violence. The Reports should further acknowledge the other social, economic, security dimensions of the phenomenon. In addition, the Reports should recommend authorities to recognise, encourage and support, at all levels, the work of women's rights CSOs, often operating under limited budgets and in the absence of state support, in the provision of specialised services to victims/survivors of GBV.<sup>4</sup>

## Women, Peace and Security

Most Reports now include a reference to National Action Plans on the United Nations Security Council Resolution (UNSCR) 1325 in Chapter 31 (Foreign, Security and Defence Policy), a positive step forward. However, in a post-conflict region like the Western Balkans, a conflict-torn country like Ukraine, or Moldova, wedged between the EU and Ukraine and with its own protracted conflict, there is no analysis of the differential impact of war, displacement and lingering conflicts on different communities, refugees and internally displaced people (IDPs). For example, the Moldova Report ignores the fact that the majority of refugees from Ukraine are women, children and older people exposed to specific risks of gender-based violence, economic insecurity, physical and mental health issues. Despite evidence of multiple ongoing initiatives, the Ukraine Report fails to acknowledge the role and contributions of women in responding to the war of aggression through provision of humanitarian aid, specialised

support to women IDPs and victims/survivors of conflict-related sexual violence (CRSV), and on addressing inter-community tensions between displaced and host communities. Both the Serbia and the Kosovo Reports gloss over the lack of women's involvement in the EU-facilitated dialogue between Pristina and Belgrade and the importance of catering to the security needs of different communities. Acknowledging that gender is a factor shaping vulnerability and resilience and challenging power structures which sustain systems of oppression and aggression is key if the EU wants to embrace a comprehensive approach to security and peace-making.

## Intersectionality

Some Country Reports display a greater attention to women exposed to intersecting forms of discrimination, with references included across different chapters. This is particularly the case for the BiH and the Moldova Reports. The BiH Report highlights that Roma women are particularly exposed to multiple forms of discrimination, GBV, including domestic violence, early marriages, human trafficking and labour exploitation and pays attention to health inequalities affecting Roma women, women with disabilities and women from rural areas in Chapter 28 (Consumer and Health Protection). The Moldova Report includes a strong intersectional perspective across different chapters, highlighting key barriers Roma women and women with disabilities, among others, face in access to services, employment, health and social protection and issuing an official recommendation to tackle the geographical and socio-economic divide in health services and ensure access for the most vulnerable groups in Chapter 28 (Consumer and Health Protection). Other Country Reports should follow suit by deepening their analysis and adding recommendations to address multiple discriminations.

To conclude, the Kvinna till Kvinna Foundation continues to strongly encourage full gender-mainstreaming of all chapters of the EU *acquis*. Integrating a gender lens across all the chapters can help deepening the understanding of political, economic and social dynamics affecting progress in EU accession and, in turn, inform the EU's ability to respond to a rapidly evolving context. Gender can be a key factor in detecting early signs of change and women's rights CSOs can help further interpreting shifts in society.

<sup>3</sup> See article 7 of the [Istanbul Convention](#).

<sup>4</sup> See article 9 of the [Istanbul Convention](#).

# Recommendations to DG ENEST and EU Delegations

- 1) Increase senior leadership support for and attention to gender equality as a vital component of the EU accession process and ensure regular training on gender mainstreaming to staff in DG ENEST and EU Delegations/Office
- 2) Standardise the process of gender mainstreaming of Country Reports with clear and concrete guidelines; introduce minimum standards to be revised by the Gender Equality Coordinator during the horizontal reading
- 3) Adopt gender-sensitive language across Country Reports; use terms that reflect gender diversity and avoid terms that perpetuate stereotypes about women, men and LGBTQI persons
- 4) Ensure a fair number of official recommendations attending to gender equality issues across different chapters of the reports and ensure they are clear, practical and action-oriented
- 5) Include key statistics and sex-disaggregated data progressively in more chapters and issue specific recommendations (in Chapter 18) to strengthen the collection, dissemination and use of sex-disaggregated data in different sectors
- 6) Where possible, specifically refer to the EU *Acquis Communautaire* on gender equality, including the Work-Life Balance Directive, the EU Victims' Rights Directive, the Directive on Combating Violence Against Women and Domestic Violence, and the Istanbul Convention, among others
- 7) Address gender-based violence as a systemic problem which requires a multi-sectoral response from different stakeholders and institutions, including police, judges and prosecutors, health and social services in close cooperation with organisations providing specialised services to victims/survivors
- 8) Further increase the intersectional approach addressing the situation of women belonging to minorities, women with different abilities and other vulnerable groups and subject to multiple discrimination
- 9) Report on the Women, Peace and Security Agenda in line with the EU GAP III in Chapter 31 (Foreign, Security and Defence Policy) and in the section on Normalisation of Relations between Kosovo and Serbia
- 10) Report on the role of women's rights CSOs in the section on civil society and in the fundamental rights section, including their role as service providers, contributions to the EU integration process, peacebuilding and reconciliation work

# Background and purpose of the assessment

## Commitments under the GAP III

On November 25<sup>th</sup>, 2020, the EU adopted the **Gender Action Plan III (2021–2027)**<sup>5</sup> (GAP III) to reaffirm EU's commitments to support gender equality and women's empowerment through its external action. In November 2023, the European Commission published the mid-term report on the EU implementation of the GAP III<sup>6</sup>, pointing at "**the pivotal role of the GAP III in elevating gender equality as a strategic priority in EU external actions. It has encouraged more comprehensive, determined and transformative approaches.**" Furthermore, the mid-term report says, "Gender equality has also featured prominently in policy dialogues with candidate countries and potential candidate countries, with the EU supporting the adoption and implementation of the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW); comprehensive evidence-based laws, aligned with the relevant EU *acquis*; and other international standards."<sup>7</sup>



## Box 1. Pivotal areas in GAP III

- 1) Ensuring freedoms from all forms of gender-based violence
- 2) Promoting sexual and reproductive health and rights
- 3) Promoting the economic and social rights / empowerment of women and girls
- 4) Promoting equal participation and leadership
- 5) Integrating the Women, Peace and Security Agenda
- 6) Addressing the challenges and harnessing the opportunities offered by the green transition and the digital transformation

As postulated in the GAP III, gender equality continues to be one of the key political objectives of the EU in its external action, be it through the accession process or through its Common Foreign and Security Policy. In **the accession countries**, the EU has been both supporting (through targeted actions and policy dialogue) and monitoring (through the Country Reports) the progress of countries aspiring to EU membership in advancing gender equality standards. This process has been further aided by the adoption of **Country Level Implementation Plans** (CLIPs) setting policy priorities, key actions and objectives on gender equality for each country. These plans were also informed by **Gender Country Profiles** and sector-specific **Gender Analyses** for the priority areas.

<sup>5</sup> [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](#)

<sup>6</sup> [Joint report on the EU implementation of the Gender Action Plan III \(November 2023\)](#)

<sup>7</sup> *Ibid*, page 3.

## Box 2. What should the gender analysis include?

According to the Guidance Note developed for DG NEAR (now DG ENEST) and EUD/ EUO Staff<sup>8</sup> under the previous GAP II, which is unlikely to change substantially under the current plan, the gender analysis for the thematic priorities should at a minimum indicate:

- Key statistics on the situation of women and girls, men and boys, which will also provide the baseline for future measurement (relevant statistics that reflect the thematic or concentration areas);
- Key barriers to achieving gender equality (including social norms, legislative, institutional capacity, political will etc.);
- Analysis of additional levels of discrimination (e.g. particular vulnerability of disabled women to violence);
- Existing national gender mechanism in the partner country;
- A mapping of who is actively working for gender equality (CSOs, donors, International Financial Institutions, line ministries etc.);
- A mapping of knowledge / information gaps (e.g. sex-age disaggregated statistical information);
- A clear assessment of where the EUD can add value;
- Realistic objectives / opportunities for policy and political dialogue.

The mid-term evaluation of GAP III<sup>9</sup> found that **CLIPs have provided a solid foundation for strengthening the EU's strategic approach to gender equality in partner countries by identifying context-specific policy and programmatic priorities.** However, as the

evaluation found “it is still uncertain where CLIPs stand on the spectrum between (i) an aspirational statement of objectives and priorities in line with GAP III; i.e., a general country-level vision (the lack of which was pointed out by the evaluation of GAP II) and (ii) a guide to operational programming and monitoring”<sup>10</sup>. Also, “with CLIPs, messaging on GEWE in policy and political dialogue (and opportunities to do so) has become stronger under GAP III than it was under GAP II. However, despite the comprehensive guidelines received from Brussels HQ, CLIPs vary widely in form, content and quality”.<sup>11</sup>

### How does this apply to EC Country Reports?

The EC Country Reports are the **key policy instrument for the EU to monitor progress of and exert pressure on** accession countries' governments on the path towards meeting the accession criteria. As a key instrument of the EU, the Country Reports should be informed by robust gender evidence to be able to meet the ambitious targets set under the GAP III and the adopted CLIPs. The EU accession process and the GAP III should mutually reinforce each other, as EU's support to gender equality issues helps partner countries meet the political criteria for membership. However, as it often happens for a process that is highly technical and somewhat rigid, the EU Accession process has often failed to incorporate and build on the opportunities offered by other EU policies, including the GAP III.

The Kvinna till Kvinna Foundation and its partner organisations have long argued that the **EC Country Reports should be better gender mainstreamed and include more stringent recommendations in relation to gender equality.** The gender mainstreaming approach adopted by the EU postulates that a gender perspective should be integrated across all sectors with a view at identifying hidden discriminatory patterns which lead to the marginalisation of women and girls, restrict their participation and limit their representation. However, allegedly this approach is not followed due to length and methodological constraints.

8 Guidance Note on EU Gender Action Plan 2016–2020 for DG NEAR HQ and EUD staff (1 April 2016).

9 Mid-term evaluation GAP III (May 2023)

10 *Ibid.* page 20.

11 *Ibid.*

### Aim of the present assessment

This is the eighth Gender Analysis of EC Country Reports for the Western Balkans and the first one including also Moldova and Ukraine since their application for EU membership. The aim is to assess the extent to which the Country Reports are gender-mainstreamed. **The analysis identifies areas where a gender perspective can be further strengthened across different chapters and include country-specific recommendations for the following year.** The assessment accounts for the fact that Ukraine is currently facing an armed aggression by Russia. This represents an unprecedented situation for a candidate country and places some constraints on the accession criteria – for example, the country is under Martial law and cannot hold

political elections – and on the collection of data and information. Particular attention will be placed on rule of law and fundamental rights (Chapter 23), on social policy and employment (Chapter 19), on foreign, security and defence policy (Chapter 31).

### Criteria used for the assessment

The analysis is focused on eight thematic areas that we and partner organisations consider foundational to women’s inclusion and representation. The selection of criteria is further inspired by the vision, mandate and mission of Kvinna till Kvinna, to support women’s rights organisations in fragile, conflict and post-conflict settings. Hence, the criteria include a strong focus on women and women’s organisations.



Ambassador of Sweden to North Macedonia Ola Sohlström and Kvinna till Kvinna Country Director, North Macedonia, Dijana Stojanović Đorđević at the Femdefenders 2025 networking event, Skopje, North Macedonia  
Photo: Maja Janevska Ilieva

## Criteria used for the assessment



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 LGBTQI persons



2. Account of women's political participation at national and local level, including key barriers preventing women from joining the public space



3. Inclusion of key statistics on the situation of women, men, girls and boys



4. Attention to all forms of gender-based violence (including committed during armed conflicts)



5. Intersectionality<sup>12</sup> including reference to Roma women, women refugees and IDPs, women with different abilities



6. Reference to roles and challenges of women's rights organisations



7. Account of women's roles in peacebuilding, dealing with the past and reconciliation



8. Integration of gender into chapters/sections other than the fundamental rights section (i.e. Public administration, Rule of Law, Environment and Climate Change)

## Dashboard

For each criterion we use signs to show improvement (or lack thereof) year on year.



The upward facing arrow indicates a positive trend compared to previous year



The downward facing arrow indicates a negative trend compared to previous year



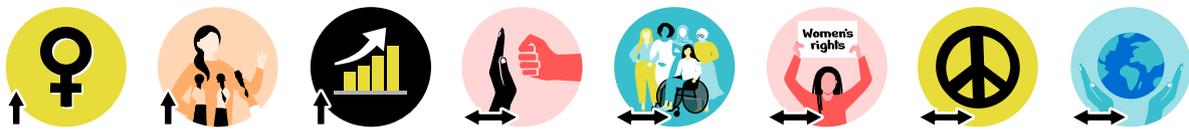
The horizontal arrow indicates no change compared to previous year



The star indicates great achievement

<sup>12</sup> Understood as the way in which different types of discrimination, because of a person's sex, ethnicity, social class, religion etc., are linked to and affect each other.

# Albania



## Summary

A positive development in the 2025 Albania Report<sup>13</sup> is the inclusion of a new recommendation in the fundamental rights section, urging authorities to align the legislation with the EU *acquis* on gender equality and non-discrimination and to adopt an ambitious Gender Equality Law.<sup>14</sup> The same recommendation could have also included reference to the need to align national legislation with the Istanbul Convention and EU Directive on Combating Violence Against Women. Overall, the report improved compared to last year, including a clear assessment of the legal framework and main institutional weaknesses. More could be done to ensure the Report analyses key social, economic and political barriers preventing women and minorities from enjoying equal rights. On a positive note, there is more sex-disaggregated data included in different chapters compared to last year.

## Attention to gender equality and LGBTQI rights

The section on gender equality is quite short and only addresses the current legal and institutional framework on gender equality, which needs alignment with the EU *acquis*. It also refers to the weak implementation of the 2021–2030 Strategy on Gender Equality and related Action Plan. In November 2025, the new Law on Gender Equality was eventually adopted by the Albanian parliament, despite campaigns by anti-gender movements amplified by national media. The Law contains explicit references to sexual orientation, gender identity and gender expression as well as a commitment to protect trans communities.

At the same time, the proposed amendment to the Law on Civil Registry to legally recognize only two genders has been withdrawn by the Socialist Party. Issues such as reproductive health and rights, including the issue of sex-selective abortions, women's rights to property and access to justice are no longer included in the report.

The section on LGBTQI rights suggests that the legal protection of rights of LGBTQI persons needs to be improved and aligned with the EU *acquis*. Albania is missing legislation recognizing civil cohabitation, same-sex marriage, parenthood by same-sex couples and legal gender recognition. The medical protocol for transgender and gender diverse persons, already mentioned in last year's report, has not been adopted yet. The Report acknowledges that discrimination against LGBTQI persons is still pervasive.

## Women's political participation

This year's Report improved its account of women's political participation referring to the May 2025 parliamentary elections which saw 787 female candidates (38,5%), meeting the 30% quota requirement, and 50 female candidates elected (out of 150). As the OSCE/ODIHR election observation mission reported, women still face structural barriers in political participation including internal party politics, limited access to funding, limited media coverage and stereotyping.<sup>15</sup> The Report does not address the issue of participation in politics of youth, Roma and Egyptian communities, LGBTQI persons and persons with different abilities.

<sup>13</sup> EC Albania Country Report (2025)

<sup>14</sup> The Gender Equality Law was adopted in November 2025.

<sup>15</sup> ODIHR Election Observation Mission Final Report, Albania, Parliamentary Elections 11<sup>th</sup> May 2025.

### **Inclusion of key statistics**

There is some progress on including sex-disaggregated data in different chapters. This year's Report includes four graphs, one on women in political life, one on violence against women, one on femicides and one on employment rates by sex. Chapter 19 (Social Policy and Employment) refers to the gender gap in employment and decreasing women's participation in the labour market. The section on public services and human resources management includes data on women and men civil servants and the respective shares in middle-level and senior level positions. Also, sex-disaggregated data is included in the section on trafficking in human beings.

### **Sexual and gender-based violence**

The Report acknowledges that the legal framework for GBV is not in line with the Istanbul Convention. It confirms that violence against women and domestic violence remain a critical concern and that low enforcement and lack of accountability in handling cases of gender-based violence are problematic, yet no specific recommendation is included. Furthermore, this year's Report fails to acknowledge the role of women CSOs in running services for victims/survivors of GBV and fails to mention different forms of GBV, such as trafficking for sexual exploitation, child marriage, online sexual violence. The Report should introduce an official recommendation on preventing and tackling GBV and trafficking of women and girls, given the prevalence of the phenomenon in Albania.

### **Intersectionality – reference to Roma women, women refugees, women IDPs and other women subject to multiple discrimination**

There is limited attention to women from minority groups in this year's Report. The Report acknowledges that women living in rural areas, Roma and Egyptian women and LGBTQI persons continue to face multiple forms of discrimination. However, aside from this statement there is no attention to the specific situation of women belonging to minorities and women facing multiple

discriminations in the different chapters, especially in terms of access to education, housing, employment. The recommendation from last year to continue to improve access to health services for vulnerable groups, including women and girls belonging to minority groups in Chapter 28 (Consumer and Health Protection) is welcome and progress in its implementation should be closely monitored.

### **References to roles and challenges of women's rights organisations**

The Report acknowledges that civil society operates in a partly enabling environment, constrained by registration requirements and limited public funding as well as increasingly hostile narratives and campaigns. The report does not mention the growth of the anti-gender movement directly targeting women's rights CSOs with smear campaigns and delaying the adoption of key legislation, such as the Law on Gender Equality (eventually adopted in November 2025). Similarly, it does not mention the role of women's rights CSOs in providing specialized services to victims/survivors of GBV and trafficking that the state is unable to provide. The next Report should include a recommendation to strengthen the consultation mechanisms to meaningfully involve diverse CSOs in policymaking and EU accession.

### **Account of women's roles in peacebuilding, dealing with the past and reconciliation**

It is welcome that, for the second consecutive year, the Report refers to the adoption of the second National Action Plan on Women, Peace and Security in Chapter 31. However, as in previous years, there is no account of women's roles in decision-making concerning security, peacebuilding and reconciliation.

### **Integration of gender into other chapters/sections**

Gender mainstreaming of the other chapters of the report remains limited. Chapter 19 (Social Policy and Employment) only includes a reference to gender inequality in employment but with no additional analysis on why this is

the case. There is no attention to the burden of care, discrimination in employment and lack of adequate social benefits to support women's equal access (and permanence) in the labour market. The report should include an official recommendation in chapter 19 to align its legislation with the Work-Life Balance Directive and other relevant EU *acquis*. Chapter 28 (Consumer and health Protection) includes a welcome recommendation to

ensure access to quality health services to vulnerable populations, including women belonging to these groups. Chapter 26 (Education and Culture) includes data on girls enrolled in basic education but should be further gender-mainstreamed. Chapter 10 (Digital Transformation and Media), Chapter 11 (Agriculture), Chapter 18 (Statistics), Chapter 27 (Environment and Climate Change) and others should be progressively gender mainstreamed.

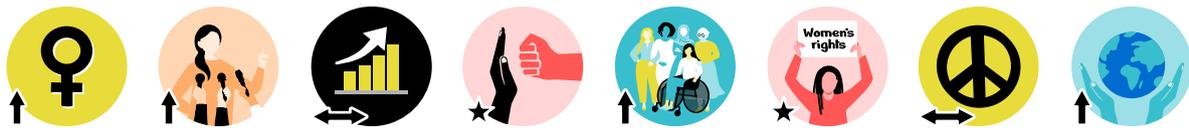


Protesters at the International Women's Day March 2025, Skopje, North Macedonia  
Photo: Maja Janevska Ilieva

## **Recommendations for the 2026 Albania Report:**

- 1) Include an official recommendation to strengthen legislation against SLAPPs in line with EU Directive 2024/1069 and pursue efforts to decriminalise defamation**
- 2) Include an official recommendation in Chapter 23 to harmonise legislation on gender-based violence with the Istanbul Convention and closely monitor the implementation of the Law on Gender Equality and ensure the effective implementation and financing of the National Strategy for Gender Equality 2021–2030 and its Action Plan**
- 3) Add an overview of structural social, cultural and legislative barriers towards gender equality and the active roles women play in society in the fundamental rights section**
- 4) Include an official recommendation in Chapter 19 to harmonise legislation with the Work-Life Balance Directive, Pay Transparency and Women on Boards Directive and the implementation of targeted measures to bridge the gender gap in employment**
- 5) Further include sex-disaggregated data across different chapters of the report and recommend in Chapter 18 to strengthen the capacity of the National Statistical Office to collect and disseminate sex-disaggregated data and statistics across policy areas**
- 6) Condemn attacks against activists and CSOs and include an official recommendation to protect and enhance civic space, simplify registration requirements, ensure adequate funding to CSOs, including those providing specialised services, and set up solid consultation mechanisms to ensure the participation of diverse CSOs in the context of EU accession**
- 7) Recognise the role of women’s CSO, including as key providers of specialised services for victims/survivors of gender-based violence (shelters, legal aid, psychosocial support) and highlight the need for sustainable public funding, transparent contracting, protection and security from smear campaigns, intimidation and SLAPPs**
- 8) Include a specific recommendation on preventing and curbing gender-based violence and trafficking of women and girls, identifying victims and ensuring access to justice and services**
- 9) Keep the reference to Albania’s National Action Plan on UNSCR 1325 in Chapter 31 and introduce a reference to the role of women in peacebuilding and reconciliation**
- 10) Reinforce gender mainstreaming across other chapters including Chapter 6 (Company Law), Chapter 10 (Information Society and Media), Chapter 11 (Agriculture and rural development), Chapter 18 (Statistics), Chapter 25 (Science and Research), Chapter 26 (Education and Culture), Chapter 27 (Environment and Climate Change).**

# Bosnia and Herzegovina



## Summary

The 2025 Bosnia and Herzegovina Report<sup>16</sup> substantially improved its approach to gender mainstreaming across different chapters. Recognising the stalled efforts on fundamental rights, the Report continues to highlight the need to fully respect and protect freedom of assembly and association. It includes two official recommendations pertaining to gender equality, one in Chapter 23 to harmonise legislation on GBV with international standards and aligning laws across the country with the Gender Equality Law and one in chapter 19 (Social Policy and Employment) to introduce uniform minimum standards on protection for maternity leave. The section on women's political participation improved, highlighting key weaknesses of the system. Also, the reference to women's rights CSOs and to the growing backlash against women's rights advocacy in Republika Srpska (RS), where the legal protections for women and LGBTQI persons are being dismantled, are welcome. The focus on GBV also improved since it is addressed not only as a fundamental rights issue but also in terms of judicial response, capacity of law enforcement and response by social and health services. There is increased attention to women from marginalised groups and women facing intersecting forms of discrimination including in Chapter 28 (Consumer and health protection) in relation to health inequalities. The reference to initiatives by women's CSOs on peacebuilding, reconciliation and remembrance is also welcome but the reference to the Action Plan on Women, Peace and Security in Chapter 31 (Foreign and Security Policy) is no longer prescriptive.

## Attention to gender equality and LGBTQI rights

Overall, the section on gender equality improved. The Report indicates that legislation on gender equality is incomplete and not harmonised across the country. Following recommendations by women's CSOs, this year's Report highlights the connection between overall shrinking civic space and growing backlash against women's rights CSOs, also referring to the role and tactics of government-funded associations in RS to roll back women's rights.

On LGBTQI persons, the Report notes that they are still discriminated and legal protection is insufficient, hate crimes and hate speech continue to be widespread and are insufficiently prosecuted. Crucially, the Report notes that in April 2025, the RS entity government removed gender identity as grounds for protection from its Criminal Code. The progressive dismantling of legal protections for women and LGBTQI persons need to be closely assessed by the EC especially when applying funding conditionality. The references to institutional framework and policy dialogue on gender mainstreaming, currently included in Chapter 19 (Social Policy and employment) should be included in Chapter 23 (Fundamental rights).

## Women's political participation

There is a good overview of women's political participation in this year's Report, including a graph highlighting women's representation in national and local politics. The Report highlights the lack of women leaders of political parties and the absence of democratic internal policies

and structures including to promote women's participation. The Report could make a step further by linking political party financing with women's political participation, for instance recommending that public funding to political parties include specific funds earmarked for activities related to gender equality. The suggestion to align the Election Law with the state-level Gender Equality Law could be turned into an official recommendation.

### **Inclusion of key statistics**

Sex-disaggregated data across the Report continues to be limited. There are graphs on violence against women, femicides, women's political participation and economic activity rates; there is a graph with data on police reports and overall convictions, but this fails to provide the complete picture of GBV. Similar to previous reports, there is a reference to the need to improve data collection to enable the development of sound policies to target key gender gaps.

### **Attention to sexual and gender-based violence**

The Report highlights the role of the High Judicial and Prosecutorial Council on monitoring cases of domestic violence. The section on GBV stresses the progress in adopting the Law on Protection from Domestic Violence and Violence Against Women by the Federation in March 2025 and the amendments to the Criminal Code in July 2025, improving alignment with international standards and EU *acquis*. However, the Report should further stress that RS has still not adopted the long-awaited legislation on domestic violence and violence against women, withdrawn from parliamentary procedure due to the pressure of anti-gender movements, further weakening protection of women and girls in the entity. On a positive note, the Report highlights that, despite GBV and domestic violence being one of the most reported crimes across the country, prosecution and sentencing are too slow and ineffective and provides key suggestions about improvements needed. Also noteworthy is the reference to the prevalence of GBV including domestic violence among Roma women and women suffering from multiple discriminations. Furthermore, the Report acknowledges the ongoing threats and intimidation against journalists, including in particular female journalists. The reference to the need for multi-sectoral response mechanisms

for victims/survivors of gender-based violence in Chapter 28 (Consumer and Health protection) is a clear step forward in framing the issue of gender-based violence in a more holistic way.

### **Intersectionality – reference to women subject to multiple discrimination**

The intersectional approach in this year's Report continued to improve. There are references in different chapters to women and girls from minority groups facing multiple discriminations. However, a specific recommendation concerning the situation of Roma women and girls is missing. The section on fundamental rights recalls that Roma women are particularly exposed to multiple forms of discrimination, GBV including domestic violence, early marriages, human trafficking and labour exploitation. For the second consecutive year the Report also stresses health inequalities affecting Roma women, women with disabilities and women from rural areas in Chapter 28 (Consumer and Health Protection).

### **Reference to roles and challenges of women's rights organisations**

The Report acknowledges that civic space shrunk further during the reporting period due to the so-called Foreign Agents Law adopted in February 2025 (then declared unconstitutional) and the re-criminalisation of defamation in RS. Funding cuts by USAID and other donors further weakened the civil society sector. Legislation on public consultations is not aligned across the country and did not improve over the reporting period. It is positive that the Report recognises the critical role of women's CSOs in reaching out to the most vulnerable in society and, at the same time, the fact that they continue to be targeted by threats, harassment, verbal abuses and SLAPPs. However, the Report could more explicitly recognise that women's and LGBTQI organisations deliver much of the frontline support to victims/survivors of domestic violence, including through the operation of safe houses. The sustainability of BiH's first LGBTQI shelter remains uncertain, as it has not secured regular public funding.

### **Account of women's roles in peacebuilding, dealing with the past and reconciliation**

For the first year, the Report acknowledges the initiatives at local level on peacebuilding, reconciliation and remembrance led by women's

CSOs. This is a welcome development especially given the lack of overall attention to these issues and the continued efforts by women's organisations. The Action Plan on Women, Peace and Security is mentioned in Chapter 31 (Foreign, Security and Defence Policy) however the Report fails to recommend its adoption.

### Integration of gender into other chapters/sections

The number of chapters of the report that are gender mainstreamed decreased. Chapter 24 (Justice, freedom and security) includes a reference to the role of the High Judicial Prosecutorial Council in monitoring judicial response to cases of domestic violence. Chapter 19 (Employment and Social Policy) highlights

the need to fully align the legislation to the EU acquis on non-discrimination and equality in employment and the Work-Life Balance Directive. It is positive that this chapter also includes reference to traditional norms on childcare and household care. The reference to the gender-balance among directors of listed companies and the need to align with the EU *acquis* in this respect should be included in Chapter 6 (Company Law). Particularly welcome is the continued attention to health inequalities for women and girls, including from minority groups, in Chapter 28 (Consumer and Health Protection). Chapter 15 (Energy) and 27 (Environment and Climate Change) no longer include a gender perspective, despite positive steps in this direction of the previous report.



## Recommendations for the 2026 Bosnia and Herzegovina Report:

- 1) **Closely monitor implementation of the recommendation to harmonise and improve legislation against domestic and gender-based violence to meet international standards, and align laws across the country to the Gender Equality Law, to increase the public and political participation of women**
- 2) **Urge BiH authorities to align the Electoral Law with the Gender Equality Law to enhance women's public and political participation including full respect of the 40% gender quota and to adopt targeted measures, including in relation to political party financing, to increase women's representation in elected positions**
- 3) **Urge authorities to harmonise Republika Srpska Criminal Code with BiH Law on Prohibition of Discrimination and ensure gender identity is recognised as grounds for protection**
- 4) **Continue addressing gender-based violence as a structural issue requiring comprehensive and coordinated approach of different institutions, recommend harmonising gender-based violence legislation across the country in line with EU *acquis*, and ensuring increased budget support for specialised services provided by women's CSOs**
- 5) **Recommend the establishment of meaningful consultation mechanisms with civil society, including women's rights organisations, in the context of the EU accession negotiations**
- 6) **Further enhance inclusion of sex-disaggregated data across different chapters of the report**
- 7) **Continue highlighting the role of women's organisations in providing services to the most vulnerable, advocating for policy changes and contributing to peacebuilding, reconciliation and remembrance**
- 8) **Report on the significant barriers Roma women and other minorities are facing in access to education, employment and health services, including on sexual and reproductive health and rights, the wide-spread gender-based violence and the practice of forced juvenile marriages affecting Roma girls, and recommend to harmonise the Roma inclusion policy with the EU Strategy for Roma Inclusion 2020–2030**
- 9) **Include a recommendation to finalise and adopt the National Action Plan on Women, Peace and Security in Chapter 31 (Foreign, Security and Defence Policy)**
- 10) **Further focus on the gender-mainstreaming of Chapters 26 (Education and Culture), Chapter 27 (Environment and Climate Change) and Chapter 31 (Foreign, Security and Defence Policy)**

# Kosovo



## Summary

The 2025 Kosovo Report<sup>17</sup> includes the highest number of official recommendations related to gender equality in comparison to other countries.<sup>18</sup> A new recommendation to introduce measures to increase gender equality in the civil service is included in the section on public administration reform. Gender analysis and perspectives continue to be integrated across several chapters and are especially thorough in relation to women's political participation, quality of justice, gender-based violence and property rights. The Report provides a clear assessment of whether current laws, policies and mechanisms are sufficient to making progress towards gender equality, suggesting the root causes and factors that continue to hinder the path towards equality. The two references to patriarchy as a root cause of gender inequality are particularly welcome. While there is a reference to the allegations of sexual harassment against women against the Kosovo Police in Mitrovica north, the section on normalisation of relations between Kosovo and Serbia fails to include a gender perspective and to address the (lack of) involvement of women and women CSOs in the EU-facilitated dialogue. More could be done to ensure that an intersectional perspective is integrated across the report.

## Attention to gender equality and LGBTQI rights

The section on gender equality includes an official recommendation to strengthen the implementation of the Law on Gender Equality, the Strategy on Gender-based Violence, enhance the gender mainstreaming of legislation and policies and adopt the Programme on gender equality. While it continues to focus primarily on the legal and institutional framework on gender

equality, it clearly stresses that implementation and enforcement is insufficient. This section highlights that Kosovo lacks a gender equality programme, a gender equality index and that gender mainstreaming of laws and policies is not consistent. The absence of gender indicators and sex-disaggregated data across sectors is also highlighted. The Report welcomes the appointment of the new head of the Gender Equality Agency.

The Report notes that the legal protection of the rights of LGBTQI persons is insufficient and that they face high levels of discrimination. Also, it stresses that Kosovo lacks a Strategy and Action Plan to ensure concrete actions in support of these rights. The Report also refers to the rise of negative sentiments in the public discourse ahead of the elections, culminated in the formation of a coalition opposing LGBTQI rights. Also, both the Civil Code and the Law on Civil Status are pending adoption, but the official recommendation issued by the EU no longer covers them. The Report further notes that there was no progress in setting up shelters for LGBTQI victims of family violence.

## Women's political participation

The analysis of women's political participation significantly improved. The section on elections thoroughly reports on women's political participation in the February 2025 elections, noting that it has been increasing but not exceeding the 30% quota established by law. Compared to last year, the Report analyses the structural barriers holding back women's political participation including male dominance in campaign spaces, limited media exposure, fewer campaign resources and a political discourse often

<sup>17</sup> EC Kosovo Country Report (2025)

<sup>18</sup> See Annex 1 for the table with official recommendations.

marred by misogynistic rhetoric and personal attacks. The Report clearly indicates that, despite quotas and legal commitments, persisting patriarchal norms dominating party politics and public life constrain women's participation and influence in Kosovo politics.

### **Inclusion of key statistics**

Gender-disaggregated data and statistics continue to be limited in the Report. There is data on women's political participation, cases of violence against women, including domestic violence, femicides, women in the police force, procedural rights of victims of crimes as well as employment and unemployment rate for women and men. There is no longer data on the number of victims/survivors of sexual violence during conflict who saw their status recognised. Chapter 18 (Statistics) recognises that the Kosovo Agency for Statistics does not systematically compile gender-disaggregated data but fails to issue a recommendation in this respect. The Report notes that Kosovo still does not have a Gender Equality Index.

### **Sexual and gender-based violence**

For the third consecutive year, the Report includes a welcome recommendation to ensure accountability and efficiency of judges and prosecutors in handling cases of gender-based violence in the section on judiciary, noting that there are systemic challenges in handling these cases linked to inefficient prosecution, deficient indictments and inconsistency in sentencing. In the section on fundamental rights, the report further recommends strengthening the implementation of the strategy on gender-based violence. Overall, the Report largely focuses on domestic violence as the most prevalent form of GBV but this year it also suggests the adoption of policies and mechanisms aimed at addressing all forms of cyber-violence, including gender-based violence, in line with European standards, that is the new Directive on Combating Violence Against Women and Domestic Violence. It also recognises that the current system is insufficient to properly prevent and address GBV, protect victims and support reintegration of perpetrators. Deeply engrained patriarchal attitudes and stereotypes are mentioned also in this section. The Report also notes that the database recording cases of domestic violence is now fully functional and that in 2025 the government increased funding for specialised support services. Other forms of

GBV such as sexual harassment, body shaming, verbal attacks and rape, which were previously included, are no longer acknowledged. The issue of trafficking in human beings continues to be gender-blind, with no attention to women and girls who are the majority of victims of human trafficking with the purpose of sexual exploitation.

### **Intersectionality – reference to women subject to multiple discrimination**

The intersectional approach in the Report did not improve. There is limited attention to women and girls belonging to minority communities, aside from a cursory reference to the fact that women from Roma, Ashkali and Egyptian communities suffer multiple discriminations in the section on gender equality. The section on non-majority communities is entirely gender-blind despite recognising that early/forced marriages, early drop-out rates from school and poor access to healthcare remain key challenges. The gender dimension of these issues is completely ignored. Chapter 28 (Consumer and Health Protection) recognises that women's access to healthcare and in particular sexual and reproductive rights remains challenging in Kosovo but pays no attention to women from minorities.

### **References to roles and challenges of women's rights organisations**

The Report acknowledges that the mechanisms for consultations with civil society are in place however, the government should comply with the regulatory framework and duly consider feedback from civil society. The Report also suggests that greater consultations with organisations advocating for non-majority communities' rights, women's rights and rights of persons with disabilities would be beneficial. Crucially, the report recognises that women's rights organisations play a key role in advancing gender equality and provide legal and psychological services to women victims of violence. The Report could have further highlighted the role of women's rights CSOs in building a culture of peace and promoting reconciliation across ethnic lines.

### **Account of women's roles in peacebuilding, dealing with the past and reconciliation**

The section on normalisation of relations between Kosovo and Serbia continues to be largely gender-blind, yet it includes a reference to the

allegations of sexual harassment against the Kosovo police in Mitrovica north. In general, the disregard for the Women, Peace and Security Agenda in the framework of the facilitated Belgrade-Pristina dialogue, despite numerous requests by women's rights CSOs,<sup>19</sup> taints the EU's reputation as a credible actor in relation to UNSCR 1325. It remains unclear how current and future agreements will address the security needs of women and girls, especially as they are not represented in any official negotiation. The Report recommends the adoption of the NAP on WPS, currently missing, and commends the ongoing work of the President in this respect.

### Integration of gender into other chapters/sections

The section on functioning of the labour market stresses the wide gender gap in employment. Chapter 19 (Social Policy and Employment) indicates that Kosovo adopted a new employment and market strategy and suggests that more efforts are required to address discrimination in employment practices

including hiring procedures, promotion and pay. There is no longer a clear analysis of the causes leading to women's low activity rates, including unequal share of maternity leave, parental leave and care work, replaced by a reference to the fact that increasing the availability of affordable child and elderly care facilities could help boost women's participation in the workforce. A specific recommendation to align the legislation with the EU *acquis* on gender equality in labour and adopt measures to target women's low employment rates would be welcome. Chapter 25 (Science and research) no longer includes a specific recommendation to devise and implement a gender strategy for research at national level. While Chapter 28 (Consumer and Health Protection) includes a reference to women's access to healthcare including sexual and reproductive health rights, other key chapters such as Chapter 26 (Education and Culture), 27 (Environment and Climate Change) are gender-blind and Chapter 24 (Justice Freedom and Security) does not explicitly address the issue of women trafficked.



One of the participants of the Femdefenders 2025 networking event, Skopje, North Macedonia  
Photo: Maja Janevska Ilieva

19 [A Seat at the Table](#) - Women's contributions to and expectations from peacebuilding processes in Kosovo, Kosovo Women's Network (2021).

## **Recommendations for the 2026 Kosovo Report:**

- 1) Call for the adoption of the amendments to the Labour Law in line with the EU Work-Life Balance Directive, including well-regulated maternity, paternity and parental leave and the alignment of the legislation with the Employment Equality Directive and Racial Equality Directive**
- 2) Call for the adoption of the Civil Code and Law on Civil Status to safeguard the fundamental rights of all individuals including those of diverse genders, gender identities and sexual orientations and to eradicate discrimination based on sexual orientation and gender identity in Family law**
- 3) Call for the harmonisation of the Law on Local Elections and Law on General Elections with the Law on Gender Equality to ensure equal representation of women and men in elected bodies**
- 4) Recommend revising the Law on Public Financial Management and Law on Public Procurement to better institutionalise gender-responsive budgeting in line with the requirements of the Law on Gender Equality and Sustainable Development Goal indicator 5.c.1.**
- 5) Continue addressing the issue of the capacities of the judiciary in handling cases of GBV in the section on the functioning of the judiciary and call for better coordination among institutional actors and close cooperation with women's rights CSOs providing specialised services to victims/survivors of violence**
- 6) Improve the intersectional perspective in the Report, recognising how gender intersects with other social markers including age, disability, ethnicity, urban/ rural location, and how this leads to multiple discrimination in relation to, among others, access to education, employment, property and health services in relevant chapters**
- 7) Recognise the role of women's rights CSOs in providing services to women victims/survivors of gender-based violence and their active role in peacebuilding, remembrance and reconciliation. Ensure expertise of women's rights CSOs is called upon in gender mainstreaming of legislation and policies**
- 8) Include a gender perspective in the section on normalisation of relations between Kosovo and Serbia, and report on the WPS Agenda as part of the EU-facilitated dialogue**
- 9) Increase the number of chapters that are gender-mainstreamed, including chapter 11 (Agriculture and rural development), Chapter 26 (Education and Culture) Chapter 27 (Environment and Climate Change), Chapter 28 (Consumer and health protection)**

# Moldova



## Summary

The Moldova Report<sup>20</sup> includes three official recommendations pertaining to gender equality issues<sup>21</sup>, one under the Fundamental Rights section (Chapter 23), one under the chapter of Social Policy and Employment (Chapter 19) and one under the chapter on Consumer and health protection (Chapter 28). The section on gender equality provides a good overview of the state of play of legislation and its implementation but fails to indicate what is still missing to bring the legislation in line with the EU *acquis*. The Report has a strong intersectional perspective across different chapters, highlighting key barriers women, Roma women, women with disabilities face in access to services, employment, health and social protection.

## Attention to gender equality and LGBTIQ rights

The section on gender equality notes that the legal and institutional framework on gender equality and combating gender-based violence is partially in place, but implementation and enforcement need to be improved. There is no analysis of barriers preventing women from enjoying equal rights in different sectors and what reforms should be prioritised. The Report mentions that, with the new rules for gender mainstreaming, the integration of gender considerations in strategic planning and policy development have improved.

The attention to LGBTIQ rights is limited and should be improved throughout the report. The Report suggests that legal protection of LGBTIQ persons is adequate, but they face discrimination and low acceptance in society.

In practice though, the enforcement of the legal framework protecting LGBTIQ persons is limited, leaving them exposed to discrimination, abuse and violence.<sup>22</sup> The Report acknowledges that political actors, the Orthodox church and Russian-affiliated media continue to be vocal against the LGBTIQ community and spread dis- and misinformation. Yet, it could further stress how gender- and identity-based disinformation (GID) impacts on the safety and enjoyment of fundamental rights by women and LGBTIQ persons. The Report also highlights that the normative framework on human rights and non-discrimination should be strengthened in line with the EU *acquis*.

In relation to human rights, the Report further notes that the legislative framework lacks a specific mechanism to assist residents from the Transnistrian region exposed to human rights violations.

## Women's political participation

The Report focuses on the presidential elections held in 2024, indicating that 4 out of 11 candidates were women and that women constituted the majority of the election management bodies at various levels. However, the Report lacks an analysis of barriers and obstacles to women's political participation and the use of gender- and identity-based disinformation (GID) during elections and of legislation and measures in place to ensure equal participation in politics at national and local level. While a woman was elected president, substantial barriers persist in access to elected positions, including in relation to

<sup>20</sup> EC [Moldova Country Report \(2025\)](#)

<sup>21</sup> See Annex 1.

<sup>22</sup> Frolov, Angela, [Report on the Situation of LGBT+ Rights in the Republic of Moldova](#), GENDERDOC-M, (2025)

party politics and harmful and homophobic narratives continue to spread hindering civic participation of LGBTQI persons. Research shows<sup>23</sup> that hate speech and incitement to discrimination against LGBTQI persons during the 2024 presidential elections was prevalent and anti-LGBTQI rhetoric was often used as a political tool.

### Inclusion of key statistics

Sex-disaggregated data and statistics in the Report are limited. Sex-disaggregated statistics on employment and on violence against women and femicides are included. The chapter on statistics does not refer to the need to improve collection and dissemination of sex-disaggregated statistics.

### Sexual and gender-based violence

The section on sexual and gender-based violence is quite thorough. It highlights the strengthening of the legislation on gender-based violence and the introduction of new crimes of stalking, forced marriage and digital abuse in line with the Istanbul Convention. It also stresses that access to and trust in the legal system is still relatively low and that the newly established National Agency for Combating and Preventing Violence Against Women and Domestic Violence and the National Coordination Council for Preventing and Combating Violence against Women and Domestic Violence are functioning but lack capacity. There is reference to the efforts to increase the capacity of support services in place for victims/survivors of GBV, both state and CSO-run, in line with the requirements of the Istanbul Convention. It is positive that the report stresses the higher risks of GBV faced by women with disabilities, Roma women and other women with multiple vulnerabilities and the considerable barriers in accessing services, but it could further mention Ukrainian women refugees, who face multilayered socioeconomic and security challenges. Finally, the Report stresses the lack of a central database on GBV and the current plan to adopt a new information system collecting sex-disaggregated data on different types of GBV.

### Intersectionality – reference to Roma women, women refugees, women IDPs and other women subject to multiple discrimination

The Report includes a strong intersectional perspective across different chapters, in particular Chapters 23, Chapter 19, Chapter 28. References to women suffering from multiple discriminations are included in relation to exposure to SGBV and access to services, employment, access to public health services. In relation to education, the report highlights the challenges for Roma children and children with disabilities but does not refer to the specific challenges girls face. The intersectional perspective is missing in the section on asylum which fails to acknowledge that the great majority of Ukrainian refugees in Moldova are women (64%), children (47%), older people (23%), and people with disabilities (10%).<sup>24</sup> They are exposed to specific risks including those of GBV, economic insecurity, physical and mental health issues, challenges in access to services tailored to the needs. These risks and needs should be anticipated and met with adequate gender-sensitive and -responsive measures.

### References to roles and challenges of women's rights organisations

The Report indicates that civil society operates in an overall enabling environment and that civil society is involved in decision-making and in the preparatory phase of the EU accession process. The USAID funding cuts, which provided a lifeline to many CSOs are mentioned, indicating that they are affecting their long-term sustainability. There is no specific mention of funding challenges of organisations supporting women's and LGBTQI rights. Also, the report refers to CSOs providing specialised services to women victims/survivors of violence, but it does not specify that they are primarily women-led CSOs.

### Account of women's roles in peacebuilding, dealing with the past and reconciliation

Chapter 31 includes a reference to the Moldova NAP on UNSCR 1325 recommending authorities to keep the commitments beyond 2027.

23 Corobcenco, Irina, *Hate Speech and Incitement to Discrimination*, Promo-Lex, (2025).

24 UNHCR, *Ukraine Situation - Moldova: 2026 Programme Summary for Moldova* (30 January 2026).

The EU-Moldova Security and Defence Partnership, signed in 2024, indicates that gender equality will be a key area of cooperation in the context of security and defence and that the EU and Moldova will exchange good practices on the implementation of the WPS commitments. This provides an opportunity to further report on these issues in the future, including addressing how the WPS agenda can be used to address hybrid threats.

### Integration of gender into other chapters/sections

Chapter 19 (Employment and Social Policy) refers to the adoption of legislation aimed at ensuring equal opportunities and equal treatment of women and men in employment, yet it notes that

women continue to earn substantially less than men for equal work. Also, the Report notes that women's participation in the labour market has increased due to extended childcare and parental leave but access to services in rural areas remains limited. It is welcome that the Report recommends Moldova to fully align with the gender equality EU *acquis* in this area, including the Work-Life Balance Directive, the Pay Transparency Directive and the Women on Boards Directive. Chapters 26 (Education and Culture) and 28 (Consumer and health protection) also include key references to gender aspects, including highlighting the government's efforts to strengthen the inclusivity, equity and gender-awareness of the education system and VET and stressing the persistent health inequalities and barriers in accessing health services for women and people with disabilities.

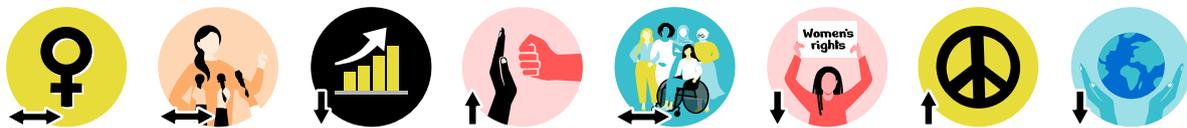
Elena Sirbu and Olga Bitca, Roma Women Platform ROMNI, Moldova  
Photo: Roma Women Platform ROMNI



## Recommendations for the 2026 Moldova Country Report:

- 1) Introduce an official recommendation in Chapter 23 to align national legislation with the EU *acquis* on gender equality, including specifying key priorities
- 2) Include an official recommendation in Chapter 23 to align national legislation with the EU *acquis* on human rights and non-discrimination, including amending the Criminal Code in relation to hate crimes and hate speech, and recommend the effective enforcement of legal framework to protect the rights of LGBTQI persons
- 3) Include a thorough analysis of women's political participation, including at local level, and issue a specific recommendation to address barriers to women's political participation at different levels; address the issue of gender- and identity-based disinformation (GID) in elections and its consequences for women and LGBTQI persons
- 4) Include sex-disaggregated data across as many chapters of the report as possible and issue a specific recommendation to strengthen the system of collection and dissemination of sex-disaggregated data across different sectors under Chapter 18
- 5) Include an official recommendation to fully involve diverse civil society organisations, including women's rights CSOs, in policymaking at national and local level and ensure adequate mechanisms for their oversight of EU-accession reforms, including those of the Reform Agenda
- 6) Include a gender-sensitive account of the situation of Ukrainian refugees in the asylum section highlighting their specific needs and risks they are exposed to and the challenges in accessing services
- 7) Highlight the role of women's civil society organisations in providing specialised services to survivors of gender-based violence, assisting refugee women and vulnerable groups from Ukraine and the current funding and security challenges; address the issue of security of women human rights defenders
- 8) Report on EU-Moldova cooperation and exchange on best practices on WPS, as provided in the EU-Moldova Security and Defence Partnership and further report on Moldova's implementation of the National Action Plan on UNSCR 1325
- 9) Strengthen the capacities of the Centre for Strategic Communications and Countering Disinformation and the National Agency for Cyber Security to analyse gender- and identity-based disinformation (GID) including in close cooperation with women CSOs

# Montenegro



## Summary

The gender mainstreaming of the 2025 Montenegro Report<sup>25</sup> slightly improved. Two official recommendations now relate to gender equality.<sup>26</sup> Chapter 23 extends its recommendation to adopt all pending recommendations by international bodies to GREVIO (Group of Expert on Actions Against Violence Against Women and Domestic Violence)<sup>27</sup> and Chapter 19 (Social Policy and Employment) includes a new official recommendation to adopt and implement the Law on social policy and child protection, Law on the protection of equality and prohibition of discrimination and amendments to the Labour Law ensuring that all national provisions fully align with the EU *acquis* on gender equality. Furthermore, the same chapter thoroughly analyses the social, economic and cultural barriers holding back women's employment and identifies priority actions, including the commitment to improve provision of quality childcare as indicated in the Reform Agenda. This is a positive step forward, however, the Report could have further recommended the adoption of specific affirmative measures to increase women's participation in the labour market and steps to address discrimination and harassment in the workplace. The Report highlights some improvements such as the adoption of the amendments to the Electoral Law with the introduction of the 40% gender quota

and the adoption of the “zipper system” to include one out of three candidates in electoral lists from the least represented gender. However, the introduction of new combined system of quotas for the least represented gender is still not in line with the 2024 CEDAW recommendations asking for gender parity on electoral lists (50–50). A reference to UNSCR 1325 is included in Chapter 31 (Foreign, Security and Defence Policy).

## Attention to gender equality and LGBTQI rights

It is welcome that the Report this year clearly states that the legal and institutional framework for gender equality and combating gender-based violence is incomplete and its enforcement needs to be improved.<sup>28</sup> However, the Report fails to issue a specific recommendation to bring the legal and institutional framework in line with the EU *acquis* on gender equality. It is positive that the Report highlights the existence of harmful gender norms and multiple and intersecting forms of discrimination and the references to the GREVIO and CEDAW reports. The specific weaknesses of the gender equality framework, including lack of human and financial resources, lack of awareness and commitments are mentioned but again no recommendation is issued. The adoption of the new 2025–2029 National Gender Equality Strategy and accompanying Action Plan are mentioned.

<sup>25</sup> EC Country Report Montenegro (2025)

<sup>26</sup> It is worth reminding that in the 2022 Montenegro Country Report, three official recommendations pertained to gender equality: 1) The Parliament should strengthen the professional and expert capacity of its administrative staff and improve women's political representation; 2) Improve the legal and institutional framework to ensure better access to justice, procedural rights and free legal aid for victims of human rights violations and crimes, in particular children, women, minorities, including Roma and Egyptians and persons with disabilities; 3) Continue the implementation of the Labour Law, and develop quality employment measures aimed at young people and women, people with disabilities, minorities and vulnerable persons impacted by the pandemic. These recommendations were removed without a clear reasoning.

<sup>27</sup> First thematic evaluation report, GREVIO (2024)<sup>10</sup> (22 November 2024).

<sup>28</sup> Among the key laws awaiting adoption: The Draft Law on Amendments to the Criminal Code of Montenegro introduced femicide as a specific form of aggravated murder of a female person 'motivated by gender-based reasons' (article, 144 point 9). However, official criminalisation of femicide is still missing; no significant development in adopting amended Criminal Procedure Code (CPC) that needs to introduce a new Chapter on Victim's Rights and immediate protection orders to victims of domestic violence; no evident progress in adopting the new Law on protection against domestic violence drafted in 2023.

On LGBTQI rights, the Report highlights that the legal protection of LGBTQI persons needs to be improved and aligned with the EU *acquis*. The Law on Legal Gender Recognition is still pending, despite having completed all necessary steps, the report should recommend its adoption. In practice, discrimination and hate speech against LGBTQI persons continue, and judicial practices are not streamlined.

### Women's political participation

This year's Report acknowledges that women's political participation is still low and undermined by insufficient state and public efforts to overcome gender stereotypes. It welcomes the adoption of the amendments to the Electoral Law introducing the 40% quota for the least represented gender. However, the introduction of new combined system of quotas for the least represented gender is still not in line with the 2024 CEDAW recommendations asking for gender parity on electoral lists (50–50). Additionally, the report should have called for all elected members of Parliament to refrain from hate speech, political instrumentalisation of gender equality and attacks against women, which are forms of violence disproportionately faced by women politicians.

### Inclusion of key statistics

There is little sex-disaggregated data in the Report, but the new graphs are helpful. There is data on women in politics, women in public administration, violence against women and women's and men's employment rates. The section on gender equality suggests that more efforts are needed to collect sex-disaggregated data in all spheres of life, including in the field of domestic and gender-based violence, incomes and salaries, health and social security. However, Chapter 18 (Statistics) fails to include an official recommendation in this respect.

### Attention to sexual and gender-based violence

The Report acknowledges that the legal framework on gender-based violence is not fully aligned with the Istanbul Convention and the EU Directive on Combating Violence against Women and Domestic Violence but an official recommendation in this respect is missing. The Report refers to some improvements such as the

adoption of the standard operating procedures for handling cases of gender-based violence by the Supreme State Prosecutor and the increased budget for shelters of victims/survivors of gender-based violence. However, adequate financing for specialised centres for women victims/survivors of violence is still missing. The Report should further highlight that Montenegro needs to amend the Law on Free Legal Aid to include NGOs as specialised legal support providers in the budget funding. The same relates to the NGO amendments to the Draft Law on Domestic Violence, initiative to improve licensing of women's rights organisations service providers based on a victim-/survivor-centred approach and sustainable funding. It is of concern that there is only a cursory reference to femicide, but no additional information or analysis is provided. From next year, the Report should include the official recommendations issued by GREVIO in its latest report.<sup>29</sup>

### Intersectionality – reference to women subject to multiple discrimination

The attention to women from minorities and vulnerable groups did not improve. Aside from a cursory reference to women facing multiple discriminations in the section on gender equality, the section on minorities, persons with disabilities, education and consumer and health protection pay no attention to women from vulnerable groups. Even the reference to child marriages included in previous reports was removed.

### References to roles and challenges of women's rights organisations

The Report indicates that civil society operates in an overall enabling environment, yet while the role of civil society in policy making is formalised, at times it is purely symbolic. Also, the Report notes that there have been instances of public criticism and allegations by high profile public officials discrediting the work and reputation of human rights defenders. This signals a concerning trend in Montenegrin society, coupled with the rise of anti-gender sentiments and misogynistic attacks against women. The Report should further highlight the risks of pervasive stereotypes, patriarchal culture and different forms of GBV including hate speech.

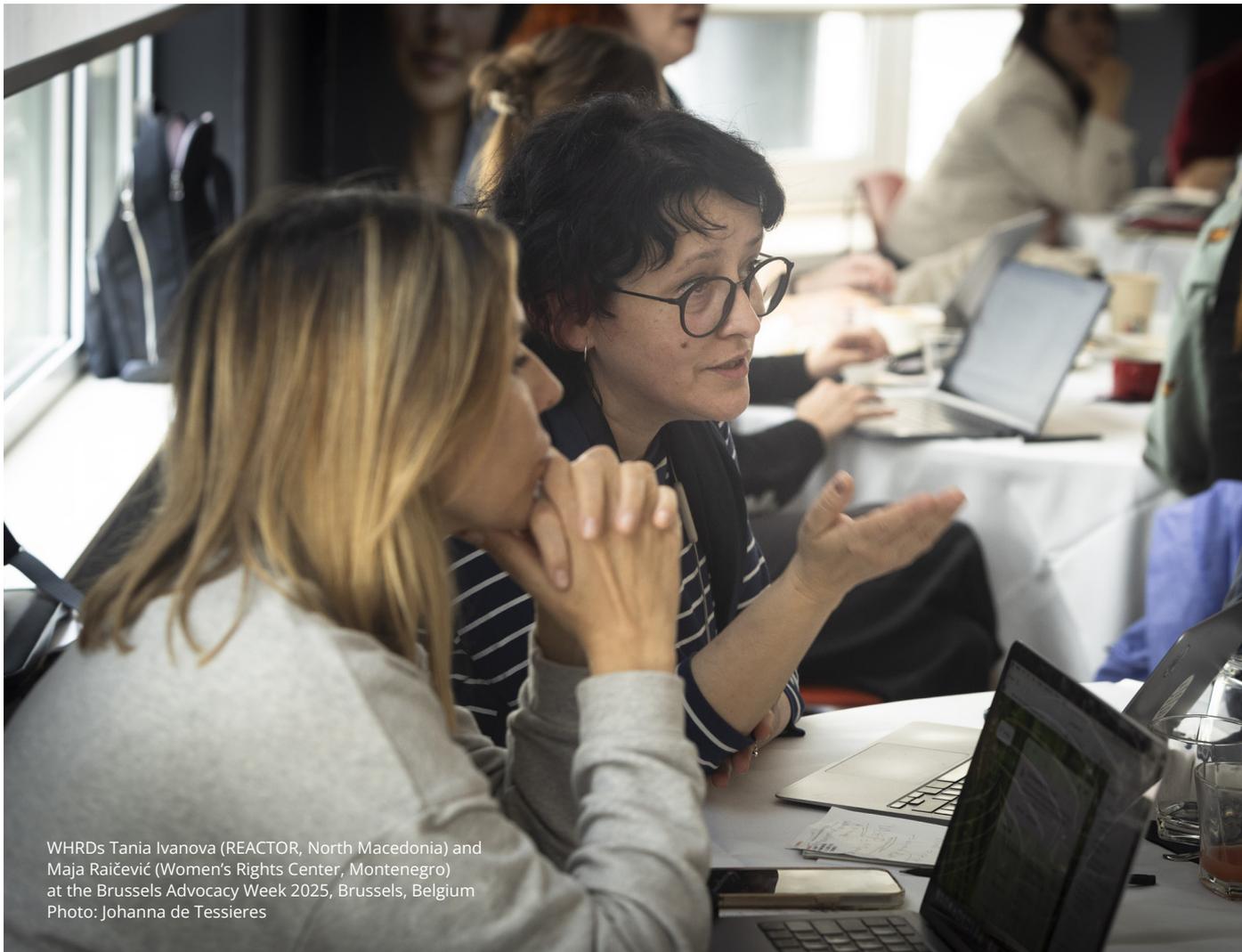
### Account of women's roles in peacebuilding, dealing with the past and reconciliation

This year's Report mentions that the implementation of the National Action Plan on UNSCR 1325 is ongoing in Chapter 31 (Foreign, Security and Defence Policy). However, there is no information about women's participation in peace and security efforts.

### Integration of gender into other chapters/sections

Chapter 19 (Social Policy and Employment) improved in that it analyses some of the structural issues affecting women's labour participation, including disproportionate burden of care and traditional gender roles affecting occupational choices. Also, a new recommendation to align the legislation with

the EU *acquis* on gender equality is issued, a welcome development. However, the Report could have further recommended the adoption of specific affirmative measures to increase women's participation in the labour market, including those belonging to minorities, and steps to address discrimination and harassment in the workplace. It is a negative development that gender issues are no longer included in Chapter 25 (Science and Research), Chapter 23 (Financial Control) and Chapter 26 (Education and Culture). Chapter 6 (Company Law) includes a cursory reference to the EU Directive on women on boards. Chapter 28 (Consumer and Health Protection) this year addresses the issue of quality healthcare for LGBTQI persons and indicates that with the 2025 Law on Healthcare women are entitled to free healthcare services, including the services of gynaecologists.



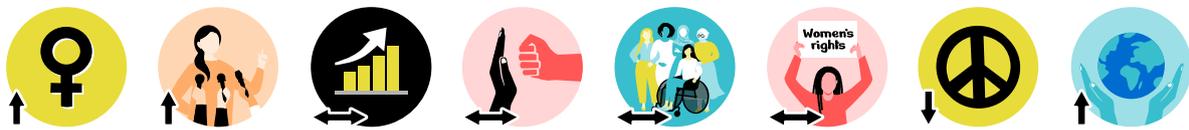
WHRDs Tania Ivanova (REACTOR, North Macedonia) and Maja Raičević (Women's Rights Center, Montenegro) at the Brussels Advocacy Week 2025, Brussels, Belgium  
Photo: Johanna de Tessieres

## Recommendations for the 2026 Montenegro Report:

- 1) **Recommend the adoption of the Law on Government and the Law on Parliament to ensure smooth functioning of the institutions and adequate checks and balances**
- 2) **Reintroduce an analysis of women's political participation in the section on parliament and recommend adhering to CEDAW<sup>30</sup> recommendations to amend the Electoral Law and strengthen the parliamentary representation and participation of women in political and public life**
- 3) **Include a recommendation to adopt the amendments to the Law on Domestic Violence and align the definition of gender-based violence and violence against women across legislation in line with the Istanbul Convention and GREVIO recommendations (which is now part of the narrative of the report) and introduce the crime of femicide**
- 4) **Establish single database on cases of gender-based discrimination at the national level and introduce a system for regular monitoring and reporting on these cases (including trends, outcomes, and follow-up measures)**
- 5) **Recommend the adoption of specific affirmative measures targeting women, particularly from marginalised groups, to increase their active participation in the labour market and to close the gender pay gap in Chapter 19**
- 6) **Recommend that the system of licencing of NGOs providing specialised services to women victims/survivors of gender-based violence be mindful of the principles of confidentiality and autonomy of women's rights organisations, and ensure their funding, in line with GREVIO recommendations**
- 7) **Call for full implementation of the Law on NGOs and relaunch of meaningful cooperation and dialogue between ministries and NGOs**
- 8) **Adopt an intersectional perspective across different chapters, including information and data on Roma and Egyptian women, women from rural areas, women heads of households, women with different abilities, elderly women**
- 9) **Include additional information on the implementation of the NAP on UNSCR 1325 in Chapter 31 (Foreign, Security and Defence Policy) with a cross-reference under the fundamental rights section**
- 10) **Recommend strengthening in-house gender expertise in all ministries, including appointing gender focal points**

30 Montenegro [Third Periodic Report on the Implementation of the Convention on Elimination of All forms of Discrimination Against Women](#) CEDAW, September 2021.

# North Macedonia



## Summary

The 2025 North Macedonia report<sup>31</sup> includes a new recommendation under Chapter 19 (Social Policy and Employment) to take steps to align the national legislation with the EU *acquis* and standards on equality and non-discrimination in employment, including the Work-Life Balance Directive, Pay Transparency and Women on Boards. The gender equality section includes sharper language on the lack of progress in the area of gender equality. However, it fails to acknowledge that the backsliding in gender equality is prompted by the normalisation and institutionalisation of anti-rights and anti-gender movement, mentioned in the previous reports, which is part and parcel of the growing anti-democratic trend in the country. Disinformation and harmful narratives are fuelling intolerance, hate speech and attacks against women, LGBTQI persons, female journalists and activists and preventing the adoption of key legislation, including the law on Gender Equality. In this context, the EC should issue an official recommendation to stop delaying the adoption of key laws, including the Gender Equality Law and the Law on Harassment at Work and refrain from eroding already established rights and standards, in line with the EU *acquis*. The section on women's political participation should be coupled with an official recommendation to amend the Electoral Code to ensure equal participation of women in politics. Reference to the second NAP on Women, Peace and Security is included in Chapter 31, (Foreign and Security Policy) but no further information is added on its implementation and participation of women's rights CSOs.

## Attention to gender equality

The report acknowledges that the legal and institutional framework on gender equality is incomplete and that there were no efforts to align with the EU *acquis*. Also, the implementation of the

National Strategy for Gender Equality (2022–2027) and related action plan are insufficient. The report should have further highlighted that this is the result of the lack of political will and spread of anti-rights and anti-gender movement and narratives, mentioned in the previous reports but not in the 2025 edition. This trend is clearly reflected in the adoption of amendments to the Law on primary education and the Law on Secondary education removing content on sexual and reproductive rights and gender equality, the delays in the adoption of the Law on Gender Equality and the shifting language of municipal policies from 'gender equality' to 'equality between women and men'. Given the evident backsliding, the EC should have issued an official recommendation in this respect, including in relation to the adoption of the Law on Gender Equality, now on hold for years due to the active campaigning of anti-gender actors. On LGBTQI rights, the Report continues to recognise that there has been no progress in improving the policy and legislative framework to advance LGBTQI rights and that LGBTQI persons continue to face discrimination. There was no progress in implementing the ECHR judgment (January 2019) concerning legal gender recognition and the legislation still does not recognize same-sex couples. The Report should further highlight the spread of disinformation and mis-information on LGBTQI rights and how this is fuelling hate speech, discrimination and holding back reforms. The report mentions that LGBTQI organisations are concerned about the USAID funding cuts which may further weaken the movement as anti-democratic actors continue to gain influence.

## Women's political participation

The Report includes a brief overview of women's political participation at national and local level (including a graph) indicating that meaningful empowerment remains limited. However, the

section, could further elaborate on limited representation of women in politics<sup>32</sup> and its contributing factors. Currently, only 3 out of 24 ministers in the current government are women (21 men) and only 4 out of 81 mayors (77 men). The Report rightly suggests that steps should be taken to enhance women's participation in the electoral process and political decision making and that quotas should be strengthened. This is a welcome development however, next year it should issue a specific recommendation with clear indications about how to amend the electoral code (see recommendation n. 4).

### Inclusion of key statistics

The Report includes limited sex-disaggregated data. There is a graph on women's political participation, one on violence against women, including domestic violence, and one on femicide. Data on women in the public service is included and sex-disaggregated data is included in Chapter 26 (Education and Culture) on primary and higher education. Chapter 19 (Social Policy and Employment) includes a graph on women's and men's activity rate. Similar to the 2024 report, Chapter 18 (Statistics) fails to acknowledge the lack of reliable sex-disaggregated data across sectors as a key challenge to evidenced-based policymaking and to issue a recommendation in this respect.

### Sexual and gender-based violence

This year's Report improved in relation to gender-based violence. It acknowledges that challenges remain the implementation of the Istanbul Convention due to missing legislation and inadequate funding as well as lack of analysis of compliance of national legislation with the EU Directive on combating Violence Against Women and Domestic Violence. The Report should further call on the authorities to strengthen the legal, economic, and institutional framework addressing GBV and domestic violence by amending the Law on Free Legal Aid to ensure access to secondary legal aid for women victims/survivors, particularly those facing intersecting forms of discrimination, and by guaranteeing accessible, victim/survivor-centred legal services across all regions and languages. Next year the Report could issue a specific recommendation to adopt the missing legislation to ensure implementation of the Law

on the Prevention of and Protection from Violence against Women and Domestic Violence and fully align national legislation, including the Criminal Code, with the EU *acquis* on gender-based violence. In addition, the report should provide information on the provision of specialised services to women victims/survivors of GBV and the main weaknesses in the institutional response towards domestic and other forms of gender-based violence. Another key neglected issue is the economic dimension of domestic violence. Women victims/survivors incur increased costs as a result of violence, including loss of employment or reduced income, costs for healthcare, legal proceedings, as well as expenses related to leaving the home and securing new accommodation. Economic insecurity is further deepened by inadequate adjudication and irregular payment of child support. The section on human trafficking in Chapter 24 (Justice, Freedom and Security) continues to be gender-blind, with neither statistics nor information on women victims of trafficking.

### Intersectionality – reference to women subject to multiple discrimination

Similar to last year, there is limited attention to women facing multiple discriminations. Chapter 23 indicates that the action plan for Roma women and girls is implemented to a moderate extent. There is no other reference to Roma women and girls in any other chapter of the Report, especially noteworthy for Chapter 19 (Social Policy and Employment), Chapter 26 (Education and Culture) and Chapter 28 (Consumer and Health Protection). There is no attention to the phenomenon of forced marriages and to how women from minority groups are exposed to violence.

### Reference to women's rights organisations

This year's Report acknowledges that, while the civil society continues to operate in an overall enabling environment, civic space has narrowed. The Report notes that the Council for Cooperation between Government and Civil Society was reactivated, but it remains to be seen whether it will be able to fulfil its role meaningfully. A clear priority for the Council is to ensure transparency in state funding to CSOs and a clear institutional set up for cooperation with civil society. Overall,

32 Reactor – Research in Action *Women in politics 2: Path to public office and impact at the local level in North Macedonia*. (2023) and *A Gender Analysis of Political Party Programmes and Candidates Lists* (2024).

the Report could have highlighted the growing hostility against CSOs, also fuelled by anti-democratic and anti-rights forces supported by the government. This has clear implications for organisations defending women's and LGBTIQ rights. Inclusion of CSOs in policymaking in the context of EU accession and in the implementation and monitoring of the Reform Agenda remains crucial. The Report further recognises gender-based hate speech, including threats against women human rights defenders in particular on social media. This is a welcome development.

### Account of women's roles in peacebuilding, dealing with the past and reconciliation

Reference to the second NAP on WPS is included in Chapter 31 (Foreign, Security and Defence Policy) but no further information is added on its implementation and participation of women's rights CSOs.<sup>33</sup>

### Integration of gender into other chapters/sections

There are some key references to gender issues in Chapter 19 (Social Policy and Employment). The adoption of the new Law amending the Law on labour relations is mentioned and the report stresses that its harmonisation with the Law on prevention and protection from discrimination was further delayed. The report acknowledges the wide gender gap in employment, despite the

planning of a new action plan (2024 – 2027) to implement the National Employment Strategy and indicates that the Strategy for Formalising the Informal Economy (2023 – 2027) lacks sufficient gender sensitivity. It further notes that poor childcare infrastructure remains a key barrier to women's access to the labour force. The new recommendation to further align national legislation with the EU *acquis*, including the Work-Life Balance Directive, the Pay Transparency and Women on Boards Directive is welcome. Chapter 28 (Consumer and Health Protection) stresses that more efforts are needed to go beyond awareness campaigns and improve women's access to health, including sexual and reproductive health rights. The report could have further stressed the lack of adequate primary gynaecological healthcare in underserved municipalities and the specific challenges faced by women with disabilities, women in rural areas and women from minorities. Chapter 26 (Education and Culture) includes sex-disaggregated data on enrolment in primary school and in higher education but fails to stress the implications of the amendments to the Law on Primary Education, the Law on Secondary Education, and the Law on Textbooks for Primary and Secondary Education through an expedited procedure and without consultations with relevant stakeholders which led to the erasure of gender and sexual and reproductive health provisions and the elimination of all gender-related content from educational reforms.

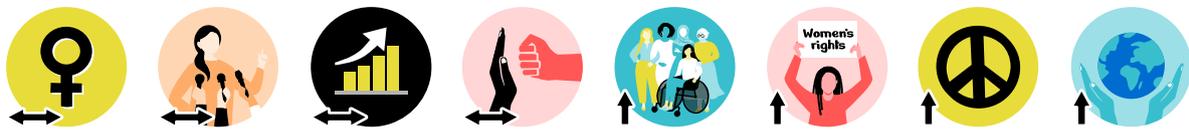


<sup>33</sup> Annual Report on the realization of the activities of the second National Action Plan of the Republic of North Macedonia for the implementation of the United Nations Security Council Resolution (UNSCR 1325). (April 2025).

## Recommendations for the 2026 North Macedonia Report:

- 1) **Recommend the adoption of the draft Law on Gender Equality and the Law on Harassment at Work in line with the EU *acquis* in consultation with civil society organisations, including women's rights organisations and feminist organisations**
- 2) **Clearly condemn the dismantling of gender equality norms, safeguards and principles from key legislation, including the Law on Primary and Secondary Education, and the spread of gender- and identity-based disinformation (GID) as tactics to further polarise and divide society and normalise hate speech and discrimination**
- 3) **Recommend full alignment of national legislation with the EU *acquis* and international standards on GBV; ensure adequate and effective implementation of the Law on the Prevention of and Protection from Violence against Women and Domestic Violence and timely adoption of a new comprehensive National Strategy for Prevention and Protection against GBV and Domestic Violence (2026–2033) that addresses systemic gaps through sustainable financing, inter-sectoral coordination, gender-sensitive data, public education, and victim/survivor-centred justice and support services**
- 4) **Further elaborate on the trend on women's political participation both at national and local level and recommend revising the Electoral Code to introduce gender quotas where they are not yet in place to ensure compliance with the 50-50 gender balance commitment included in the national Gender Equality Strategy.**
- 5) **Call for strengthening the enabling environment, safety and security for CSOs and HRDs by tackling and processing cases of misinformation, hate speech and attacks against activists, including gender-based hate speech, ensuring protection of CSOs/HRDs and journalists**
- 6) **Reintroduce an overview of different forms of gender-based violence, coupled with sex-disaggregated data and address the systemic institutional weaknesses in addressing these crimes; acknowledge the role of specialised women CSOs in providing services to victims/survivors of GBV and stress the need for adequate funding of such services**
- 7) **Recommend the government to improve systems for collecting and sharing of sex-disaggregated data and reinforcing the mandate of the State Statistical Office in this respect in Chapter 18 (Statistics)**
- 8) **Recommend strengthening meaningful cooperation and consultation mechanisms between state institutions and civil society in the framework of the EU accession process**
- 9) **Continue reporting on the alignment of North Macedonia to the EU priorities in relation to Women, Peace and Security and the implementation of the second National Action Plan on UNSCR 1325 in Chapter 31 (Foreign, Security and Defence Policy)**
- 10) **Improve the intersectional perspective across different chapters, by highlighting the situation of women subject to multiple discrimination such as Roma women, women in rural areas, migrant, asylum seeking and refugee women, women in prostitution**

# Serbia



## Summary

The 2025 Serbia Report<sup>34</sup> includes three official recommendations directly addressing gender equality, one in Chapter 23 (Fundamental Rights), two in Chapter 19 (Social Policy and Employment). Furthermore, there is one recommendation in Chapter 24 (Justice, Freedom and security) related to the adoption of the Law on the Prevention and Suppression of Human Trafficking.<sup>35</sup> Overall, the report uses stronger language condemning backsliding on freedom of expression, the excessive use of force by the police during protests and the sharp deterioration in civic space. The recognition of the role of women during protests is welcome as are the multiple references to women's rights CSOs. At the same time, in a context of severe backlash against democratic principles,<sup>36</sup> including gender equality, the EC should issue a specific recommendation to refrain from dismantling key laws and guarantees for gender equality and LGBTQI rights. The attention to GBV in this year's report and to structural weaknesses of the system and delays in the adoption of necessary legislation and policies is welcome. The reference to the adoption of the third national Action Plan on Women, Peace and Security in Chapter 31 (Foreign, Security and Defence Policy) is also positive.

## Attention to gender equality and LGBTQI rights

The section on gender equality notes that the legal framework on gender equality and GBV needs to be further aligned with the EU *acquis*. This is an understatement. Not only the legal framework is incomplete, the very notion of gender equality is being challenged by the same institutions who are supposed to uphold it,

including the Ombudsperson who challenged the constitutionality of the Gender Equality Law, still awaiting assessment by the Constitutional Court, leading to legal uncertainty and dismantling of previously established guarantees.<sup>37</sup> As mentioned in the Report, the municipalities are also replacing the wording 'gender equality' with 'equality between women and men', a binary notion that excludes multiple groups. The coordination mechanisms on gender equality have not been operational since 2022. The EU should issue a clear recommendation to refrain from dismantling key laws and guarantees protecting women's rights and LGBTQI rights and promote a culture of equality and inclusion.

The Report also stresses that further efforts are needed to eliminate gender stereotypes from textbooks and public discourse. On LGBTQI rights, the Report notes that the legal protection of LGBTQI persons needs to be improved and that there was no progress on the adoption of the draft Law on Same-Sex Partnerships and on regulation of legal gender recognition, already included in the previous anti-discrimination strategy. It further notes that the implementation of the legislation on hate crimes, including on the grounds of sexual orientation, remains inadequate. Overall, while LGBTQI persons continue to face discrimination and hate speech, the provision of legal and psycho-social support services by CSOs is jeopardised by the USAID cuts.

## Women's political participation

The Report notes that despite measures to achieve a more balanced representation, including a 40% quota for electoral lists, in practice

<sup>34</sup> EC Country Report Serbia (2025).

<sup>35</sup> See Annex 1.

<sup>36</sup> For further analysis see [Alarm Report on Progress of Serbia in Cluster 1](#), PreEUgovor (2025).

<sup>37</sup> An [open letter](#) with questions for the Constitutional Court was signed by 38 professors of Law faculties in Serbia. There was no response to the letter.

women remain underrepresented in political life, especially at local level. Data on women's representation at municipal level should be included, given that this is where they are least represented. However, the Report should further note that this pattern is rooted in a political culture dominated by misogyny, sexism, gender stereotypes and verbal attacks wherein women candidates face disproportionately more barriers to entering the political sphere compared to male candidates. The EU should issue an official recommendation to Serbia to address this problem, including sanctioning violence against women politicians online and offline, and adopt measures to ensure a more equal playing field for increased participation of women in politics.

### Inclusion of key statistics

The Report is generally lacking sex-disaggregated data and statistics. There are three graphs: on women in politics, violence against women and women's and men's economic activity. The section on gender equality includes a welcome reference to improve the collection of sex-disaggregated data and statistics, though this should have been included in Chapter 18 (Statistics) as an official recommendation. The new Law on Official Statistics was adopted in December 2025 and provides for the collection of sex-disaggregated data and statistics across more sectors. Data and statistics on cases of complaints of forms of discrimination – many of which are gender-based discrimination – and related judgements should be collected and made available by the Commissioner for the Protection of Equality, according to the amendments to the Law on Prohibition of Discrimination, but this is not yet operational.

### Attention to sexual and gender-based violence

The Report notes that violence against women and domestic violence remain widespread in Serbia and refers to the delayed adoption of the Action Plan related to the 2021 Strategy on Violence against Women and Domestic Violence. In addition, the Report stresses that Serbia needs to align its legislation with the EU Directive on Combating Violence Against Women and Domestic Violence and implement the recommendations issued by GREVIO in 2020, including amending

the definition of rape in the Criminal Code. It is welcome that the Report indicates that Serbia lacks official statistics on gender-based violence disaggregated by type of violence and relationship between the victim/survivor and perpetrator. It is also welcome that the report stresses, for the third consecutive year, that women CSOs are providing most services to victims/survivors of gender-based violence, despite limited budgets and that transparency and fairness of public funding in this area needs to be significantly improved.<sup>38</sup> Overall, as noted in the Report, the capacities and resources of safe houses remains insufficient and equal access to services to all women is still lacking. In addition, the Report under the section on procedural rights indicates that further attention should be paid to women's access to justice in all cases of GBV. The Report could further address the issue of access to free legal aid for all victims/survivors of GBV, which is yet another service provided by women CSOs and not funded by the state budget. Chapter 24 (Justice, Freedom and Security) should include a specific reference to and data on women and girls victims/survivors of human trafficking, though it is positive that it includes the recommendation to adopt the new Law on the Prevention and Suspension of Human Trafficking and Protection of Victims, which is still on hold despite this being a priority also in the Reform Agenda.

### Intersectionality – reference to women subject to multiple discrimination

The attention to women facing multiple discriminations improved. The section on gender equality recognises that Roma women, older women, poor women, women with disabilities, refugees and internally displaced women face multiple intersecting forms of discrimination. Furthermore, the section on Roma underlines that school dropouts remain high especially for Roma girls, that early and child marriages are an issue of concern among Roma girls living in settlements and that domestic violence often goes unreported. Also, the Report stresses that attention should be paid to ensuring equal access to safe houses for all women, including refugee and migrant women, transgender women and women from other marginalised

38 In 2024, women's organisations wrote an [Open letter to the Ministry for Human and Minority Rights and Social Dialogue](#) (2024) to denounce government's corruption and conflict of interest in the allocation of public funds on gender-based violence and the detrimental impact on their work.

groups. Gender-specific forms of violence to which women with disabilities are exposed in residential institutions are acknowledged. Further attention to Roma women and girls as well as other women from vulnerable groups should be mainstreamed in Chapter 19 (Employment and Social Policy), Chapter 26 (Education and Culture) and Chapter 28 (Consumer and Health Protection).

### Reference to women's rights organisations

The Report acknowledges the growing pressure, verbal attacks and smear campaigns against CSOs, including by high level officials. The deterioration of the situation, including through SLAPPs, increasingly hindered the work of CSOs and led to the decision to suspend all cooperation with authorities. This is affecting directly the accession process as the National Convention for the EU, an umbrella organisation of CSOs monitoring and contributing to accession negotiations, suspended its cooperation with political decision makers in February 2025. The recommendation issued by the EC, to improve the policy dialogue with civil society organisations and ensure transparent public participation should further include a call to refrain from attacks, surveillance, smear campaigns and SLAPPs which further erode trust and compromise civic space. The references to women's rights CSOs increased in this year's report. The EC notes that CSOs are the main providers of services to victims/survivors of gender-based violence and that they operate on limited budgets. Furthermore, the fundamental rights section acknowledges that police protocols do not mandate cooperation with specialised support services or referral of victims/survivors, leading to an underuse of CSO expertise in this area and that the law against domestic violence does not give women CSOs a standard role in drawing up individual protection plans, as recommended by GREVIO.

### Account of women's roles in peacebuilding, dealing with the past and reconciliation

Chapter 31 (Foreign, Security and Defence Policy) notes the adoption of the third National Action Plan on Women, Peace and Security 2024–2026 in April 2025. The plan was adopted five years after the expiration of the previous one and women's rights CSOs were not consulted

during the drafting phase. The NAP does neither pay attention to the role of local women CSOs nor to the importance of involving women CSOs in the Belgrade-Pristina Dialogue. The section on Normalisation of Relations between Kosovo and Serbia remains gender-blind, despite EU's and Serbia's commitments to the implementation of UNSCR 1325 which foresees the participation of women and integration of a gender perspective in all peace negotiations and peacebuilding. The CSO sector, despite limited resources, is also ensuring most of the on-going dialogue between activists, including women's groups, from Serbia and northern Kosovo, where inter-ethnic tensions continue to affect the daily lives of citizens.

### Integration of gender into other chapters/sections

The new recommendation in Chapter 19 (Social Policy and Employment) to avoid further delays and align the legislation with the EU *acquis* on non-discrimination and equality employment and social policy is welcome. Like previous years, Chapter 19 (Social Policy and Employment) indicates that the position of women in the labour market remains unfavourable compared to that of men. Not only is men's employment rate higher than that of women but the gender pay gap is at 14.5%. Importantly, the report underlines one of the consequences of the suspension of the Gender Equality Law, in that employers are no longer due to report on gender equality in the workplace. The explicit reference to maternity, paternity and parental leave not being in line with the EU *acquis* is welcome. Chapter 28 (Consumer Health and Protection) notes that adequate funding is needed to ensure implementation of the national programme on sexual and reproductive health and that gynaecological services need improvement. However, the chapter does not further address the issue of health inequalities, including for women and girls belonging to disadvantaged or minority groups. Chapter 26 (Education and Culture) refers to the need to reduce dropout rates, especially of women and girls, but it is of concern that it no longer highlights efforts to build student competencies related to gender equality, health, reproductive health, mental health, sex education, and prevention of, and response to, all forms of gender-based violence, including sexual abuse, as dictated by the Gender Equality Law.

## Recommendations for the 2026 Serbia Report:

- 1) Condemn the government's severe suppression of political and civil liberties, verbal attacks and smear campaigns on human rights defenders and civil society at large, arbitrary arrests and judicial harassment of citizens organising peacefully to protest against government corruption and nepotism
- 2) Remind the authorities that full respect and guarantee of freedom of expression, assembly and association, as well as democratic principles, are a *conditio sine qua non* for EU membership
- 3) Recommend authorities to refrain from dismantling key laws and guarantees for gender equality and LGBTIQ rights and to swiftly proceed with further aligning legislation with the EU *acquis* on gender equality and international conventions
- 4) Recommend authorities to adopt outstanding action plans and the protection of rights of LGBTIQ persons and minorities and adequate budget for their implementation, full implementation of Law and Strategy on Non-discrimination and implementation of hate crime legislation
- 5) Further expand the section on women's political participation at national and local level coupled with clear recommendation to implement the newly introduced quota of 40% for the least represented gender
- 6) Closely monitor and push for the adoption of the draft Law on Prevention and Suppression of Human Trafficking; closely monitor amendments to certain provisions which may be introduced by the Ministry of Interior responsible for coordinating the drafting of the law
- 7) Continue to acknowledge the role of women's rights organisations, who are increasingly under attack, in providing intersectional support to victims/survivors of gender-based violence, advocating for legal and policy changes to improve the situation of women and girls and reaching those from minority communities or vulnerable groups
- 8) Monitor the implementation of the third NAP on UNSCR 1325 in Chapter 31 (Foreign, Security and Defence Policy) and the participation of women CSOs in its activities; ensure a gender perspective in the section on Normalisation of Relations between Serbia and Kosovo
- 9) Introduce an official recommendation to create a database for the collection of sex-disaggregated data and statistics in various domains, including on GBV and femicide, in Chapter 18 (Statistics)
- 10) Further integrate the situation of women facing multiple discrimination such as Roma women, women refugees and IDPs, elderly women, women from rural areas, women heads of households including in Chapter 26 (Education and Culture) and Chapter 28 (Consumer and Health Protection)

# Ukraine



## Summary

The Ukraine report<sup>39</sup> includes one official recommendation pertaining to persons with disabilities under the fundamental rights section (though it lacks an intersectional approach) and one in Chapter 19 (Social Policy and Employment) on the alignment of Ukrainian legislation on non-discrimination and employment with the EU *acquis*. Overall, there is little analysis of the barriers preventing women and LGBTIQ from enjoying equal rights and no acknowledgment of the impact of the Russian war of aggression on women, girls and minorities, including displacement, economic instability and heightened risk of gender-based violence. Key recommendations should be included on what needs to be done to address gender disparities, in line with the EU *acquis*, and on adopting key pending legislation on LGBTIQ rights and anti-discrimination. The intersectional perspective is missing from the Report with the result that women suffering from multiple discriminations remain invisible.

## Attention to gender equality and LGBTIQ rights

The fundamental rights section highlights that the legal and institutional framework on non-discrimination needs to be further aligned with the EU *acquis*, including by adding sexual orientation and gender identity as grounds for discrimination in the criminal law. In addition, it notes that efforts to strengthen the capacities of police officers, prosecutors, judges and staff of the Ombudsperson to tackle discrimination, hate speech and hate crime are ongoing and should continue through suitable training and effective enforcement.

On gender equality, the Report notes that the legal framework is broadly in place, but implementation should be strengthened and

policies and action plans adopted. However, the report lacks an analysis of existing barriers preventing women and LGBTIQ persons from enjoying equal rights and overlooks the impact of the Russian war of aggression on women and girls, leading to displacement, economic instability and heightened risk of gender-based violence, among others.

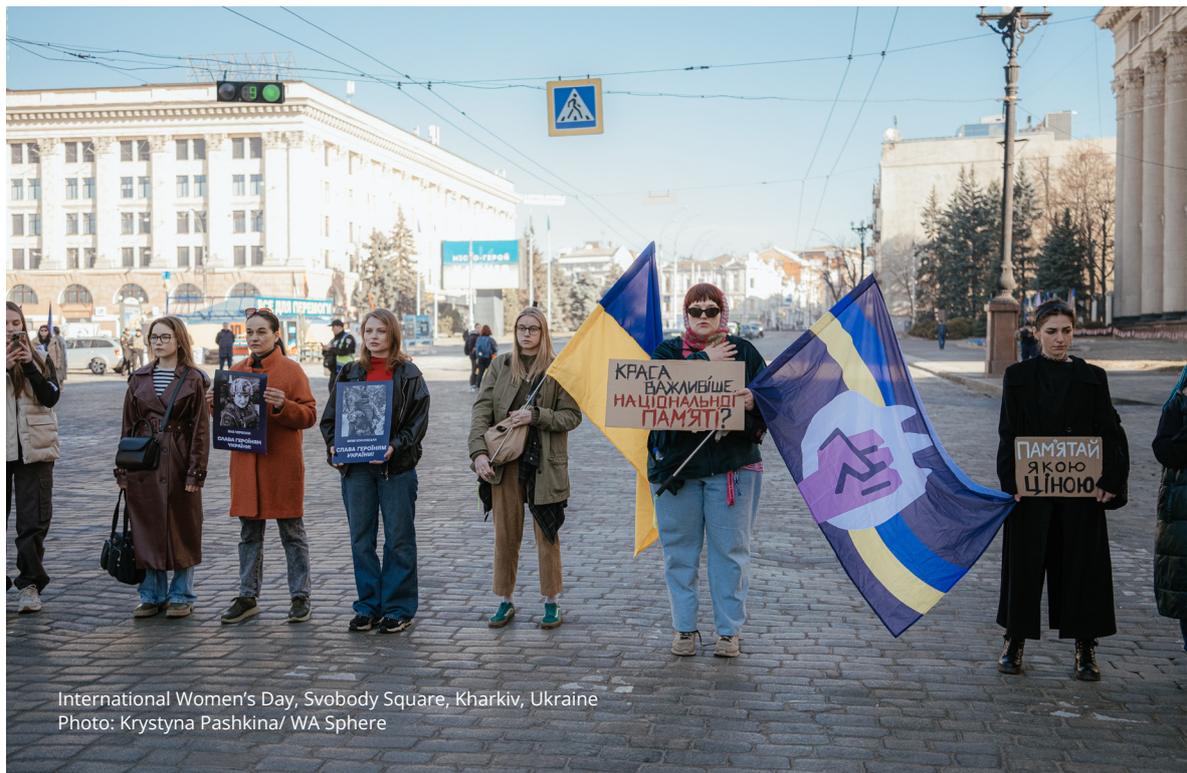
In relation to LGBTIQ rights, the report highlights that there is increased acceptance towards LGBTIQ persons, however, the adoption of key pieces of legislation has stalled, especially the draft law amending the Code on Administrative Offences and the Criminal Code which will include sexual orientation and gender identity as grounds for discrimination and hate crime. Legal gender recognition and protection of same-sex couples is also still missing, while concerns are being voiced by several CSOs about the current draft of the Civil Code which does not recognise equal rights to same-sex unions and families and jeopardises the rights of trans people.<sup>40</sup>

## Women's political participation

The Report highlights that women are still underrepresented in politics and decision-making at national level, with the proportion of female MPs still at 21%. The analysis of women's political participation should include reference to the use of gender quotas, introduced in 2020, political parties' recruitment practices, campaign funding for women and gender stereotypes, as well as gender- and identity-based disinformation (GID), as factors influencing women's potential to access elected positions. Furthermore, the report should pay attention to women's political representation at local level, given their growing presence in local governance.

39 EC Country Report Ukraine (2025).

40 ILGA Europe, *Proposed New Civil Code will Distance Ukraine from EU Accession*, (27 January 2026).



International Women's Day, Svobody Square, Kharkiv, Ukraine  
Photo: Krystyna Pashkina/ WA Sphere

### Inclusion of key statistics

Gender-disaggregated statistics in the report are sparse, this could be partially explained with the challenges in collecting sex-disaggregated data across multiple areas at times of war. The Report could still underline the importance of strengthening the collection of sex-disaggregated data across different sectors to inform evidence-based policymaking.

### Sexual and gender-based violence

The Report stresses that GBV remains a serious concern and that more decisive measures are needed to address it. It refers to the draft amendments to the Criminal Code and Criminal Procedure Code to align the national legislation with the Istanbul Convention and the EU Directive on Combating Violence against Women and Domestic Violence but it could have further highlighted the main gaps in the current legislation. Also, there is data on femicides but no data on gender-based violence, including domestic violence. The Report should further highlight what is needed to ensure that specialised services are in line with the requirements of the Istanbul Convention. The report also refers to the adoption of the Law establishing the legal status of victims

of CRSV and the possibility to receive immediate reparations, noting that implementation and stable funding have not yet been ensured. It is positive that the report notes some improved frameworks in relation to Ukraine's regulation of trafficking of small arms and light weapons, including encouraging the adoption of a relevant national strategy. However, there is no reference to the effects of the proliferation of small arms / light weapons on the prevalence of GBV and intimate partner violence (IPV),<sup>41</sup> and the reluctance of law enforcement agencies to investigate GBV committed by returning soldiers and veterans.

### Intersectionality – reference to Roma women, women refugees, women IDPs and other women subject to multiple discrimination

The Report lacks an intersectional approach in its key sections devoted to national minorities, Roma, IDPs and people with disabilities. It recommends the implementation of the amended legislation on national minorities and the Action Plan on National Minorities. In relation to Roma people, the report acknowledges that, while the legal framework is largely in place, its

41 The Kvinna till Kvinna Foundation, *The Continuum of Violence: How Small Arms are Used in Gender-based Violence at Each Stage of the Conflict Cycle*, (2024)

implementation especially on education, health services, employment, housing etc. is lagging behind. The Report also focuses on IDPs, currently 5.7 million people relocated due to Russian military aggression, and the implementation of the Strategy on internal displacement, without referring to the specific challenges of women, women with children, elderly people and people with disabilities in displacement. The intersection between gender and disability is not examined. The Report only addresses issues concerning children with disabilities, which are mainstreamed across several policy areas, including deinstitutionalisation, preschool education, and the provision of social services. This omission is particularly concerning given the compounded and growing disadvantages experienced by women facing multiple discriminations in the context of wartime.

### References to roles and challenges of women's rights organisations

The Report indicates that civil society operates in an overall enabling environment but that there has been growing pressure on anti-corruption NGOs and activists. The recently adopted laws mandated to strengthen cooperation between the state and CSOs in policymaking are expected to become operational once the martial law is lifted. Meanwhile, positive instances of cooperation between the state and CSOs are noted in relation to the EU integration process. There is no specific attention to the role of women's rights CSOs or WHRDs and their contributions to providing services to survivors of conflict-related and domestic violence, IDPs and refugees.

### Account of women's roles in conflict response

Despite evidence of multiple ongoing initiatives, there is no attention to the role and contributions of women in responding to the war of aggression through provision of humanitarian aid, and specialised support to women IDPs and victims of CRSV, and on addressing discrimination and inter-community tensions between displaced and host communities. The only attention to the situation of women in the conflict is on the new Law on the status of victims of CRSV and the need to strengthen specialised support services and infrastructure for victims/survivors of CRSV. Chapter 31 (Foreign, Security and Defence Policy) includes a reference to the National Action Plan on UNSCR 1325.

### Integration of gender into other chapters/sections

Chapter 19 (Social Policy and Employment) highlights that the national legislation is not aligned with the EU *acquis* on equality and non-discrimination in employment and occupation as well as social protection (Equality Employment Directive; Racial Equality Directive; Work-Life Balance Directive; Women on Boards Directive and Pay Transparency Directive). Sex-disaggregated data on employment dates back to 2021. The Report stresses that Ukraine has in place a strategy on reducing the gender pay gap, but this is insufficient to address the different gender disparities across employment and social policy. It is positive that the report refers to the unequal share of care responsibilities between women and men, but it should further connect it with the current employment rates and obstacles for women in the labour market. Chapter 6 (Company Law) refers to the submission of a draft Law aimed at harmonising corporate-related aspects of protection of investors' rights and improvement of gender-balance with the EU *acquis*. The wording could be clarified and specifically refer to the need to align legislation with the EU Directive on Women on Boards.



Viktoriiia Kharchenko and Maryna Tekuchova  
from Fight For Right, Ukraine  
Photo: Jakub Bors

## Recommendations for the 2026 Ukraine Country Report:

- 1) Include an official recommendation in Chapter 23 to align the national legislation with the EU *acquis* on gender equality and gender-based violence, including the Directive on Violence against Women and EU Victims' Rights Directive
- 2) Include an official recommendation in Chapter 23 to align national legislation with the EU *acquis* on the rights of LGBTIQ persons and anti-discrimination, including: amending the Criminal Code in relation to hate crimes on the basis of sexual orientation and gender identity and ensuring that the Civil Code, currently being drafted, recognises equal rights to same-sex partnerships in line with the EU *acquis* and does not discriminate against trans people
- 3) Include an official recommendation to fully involve diverse civil society organisations, including women's rights CSOs, in policymaking at national and local level and ensure adequate mechanisms for their oversight of reforms including in relation to the EU accession process
- 4) Further address the issue of women's political participation including identifying key barriers and factors preventing or blocking women from accessing elected positions at national and local level. Issue a recommendation in this respect
- 5) Address the impact of war on the social fabric in Ukraine and the diverse impact on women and men, IDPs, LGBTQI persons, Roma people, elderly people and persons with disabilities, highlighting that humanitarian aid and response strategies should be gender-sensitive
- 6) Include an analysis of the connection between the circulation of small arms/light weapons and GBV, especially IPV, in cooperation with GBV organisations as part of the fundamental rights and rule of law obligations in the accession process
- 7) Adopt an intersectional approach throughout the report, especially highlighting the multiple discriminations faced by Roma women, women from other minorities, women IDPs and refugees and women with disabilities
- 8) Highlight the role of women and women's rights CSOs in the provision of humanitarian aid, support to women survivors of gender-based violence, services to vulnerable groups and ensure full involvement of women and women's organisations in the reconstruction of Ukraine



PitchWise Festival of Women's Art and Activism in Bosnia and Herzegovina 2025,  
by CURE Foundation, Sarajevo, Bosnia and Herzegovina  
Photo: Almira Mehic / CURE Foundation

# Annex 1

Country	Chapter	Official recommendations issued by the European Commission	New / old recommendation
Albania	Chapter 23 (Judiciary and Fundamental Rights)	Further align with and implement the EU <i>acquis</i> on equality and non-discrimination including as regards sexual orientation and gender expression, ensure that the upcoming Law on gender equality maintains a high level of ambition in line with EU standards.	New
	Chapter 28 (Consumer and Health Protection)	Increase the financial and human resources in the health sector, specifically in primary healthcare and all-hazard health emergency preparedness, and guarantee equal access to quality health services for vulnerable populations, in particular for women and girls who belong to these groups.	Old
Bosnia and Herzegovina	Chapter 23 (Judiciary and Fundamental Rights)	Harmonise and improve legislation against domestic and gender-based violence to meet international standards and align laws across the country to the Gender Equality Law to increase the public and political participation of women	Old
	Chapter 19 (Social Policy and Employment)	Introduce a uniform minimum level of maternity leave benefits and protection throughout the country, starting by harmonising the definitions of maternity, paternity and parental leave.	Old
Kosovo	Public administration reform	Increase the civil services capacities through: merit-based recruitments, performance assessments and measures towards gender equality	New
	Chapter 23 (Judiciary and Fundamental rights)	Enhance the accountability of judges and prosecutors in handling high level corruption cases, organised crimes cases, other high-profile cases and gender-based violence cases; and ensure consistent enforcement of procedural discipline and stronger cases management practices.	Revised
	Chapter 23 (Judiciary and Fundamental rights)	Strengthen implementation of the Law on gender equality and the Strategy on gender-based violence; enhance gender mainstreaming of legislation, regulations and policies; adopt the programme for gender equality and the national action plan for Women, Peace and Security.	Revised

	Chapter 19 (Social Policy and Employment)	Adopt pending legislation, namely the amendments to the law on Labour, a new Law on employment and a new law on health and safety at work, making sure to align the legal framework with the EU <i>acquis</i> , notably in relation to equality and non-discrimination in employment and parental leave.	Revised
Moldova	Chapter 23 (Judiciary and Fundamental Rights)	Adopt the National Social Inclusion Programme of People with Disabilities, step up safe deinstitutionalisation of adults and children with disabilities through community-based solutions; strengthen the institutional capacities, data management, funding and implementation of national programmes on gender equality and gender-based violence	
	Chapter 19 (Social Policy and Employment)	Align the national legislation with the EU <i>Acquis</i> and standards on non-discrimination and equality, including gender equality	
	Chapter 28 (Consumer and Health Protection)	Continue tackling the geographical and socio-economic divide in health services and ensure access for the most vulnerable groups (people with disabilities, older people, Roma, women as well as people with multiple layers of vulnerability) by continuing to invest in rural healthcare and in retaining human capital	
Montenegro	Chapter 23 (Judiciary and Fundamental rights)	Adopt a new law on anti-discrimination and a new law on personal data protection, in line with the EU <i>acquis</i> , European and international standards.	Old
	Chapter 19 (Social Policy and employment)	To adopt and implement the Law on social policy and child protection, Law on the protection of Equality and prohibition of discrimination and amendments to the labour Law ensuring that all <i>acquis</i> related to gender equality in this area is fully aligned in national provisions.	New
North Macedonia	Chapter 19 (Social Policy and Employment)	Take steps to align national legislation with EU <i>acquis</i> and standards on equality and non-discrimination in employment, including also EU Gender Equality <i>acquis</i> in regard to the provisions of the Work-Life Balance Directive, the Pay Transparency, and the Women on Boards;	New
	Chapter 19 (Social Policy and Employment)	Continue to implement labour market activation strategies for young people, the long-term unemployed and low-skilled individuals, as well as for women, persons with disabilities, and Roma, and ensure that these measures are properly evaluated.	Old

Serbia	Chapter 23 (Judiciary and Fundamental rights)	Adopt and allocate appropriate financial and human resources for the pending action plans on violence against women, deinstitutionalisation, anti-discrimination – including the rights of LGBTIQ persons – and violence against children, and ensure timely reporting on their implementation; actively counter hate crimes and establish a track record of investigations and convictions;	Old
	Chapter 24 (Justice, Freedom and Security)	Adopt new Law on the Prevention and Suspension of Human Trafficking and Protection of Victims	New
	Chapter 19 (Social Policy and Employment)	Address the recommendations made in the previous functional reviews of the national employment service to ensure sufficient financial and institutional resources for employment and social policies, to systematically focus on supporting young people, women and the long-term unemployed, and continue implementing the Youth Guarantee pilot;	Revised
	Chapter 19 (Social Policy and Employment)	(...) avoid further delays in implementing the action plan for Chapter 19, including aligning further with the EU <i>acquis</i> in the area of non-discrimination and equality in employment and social policy;	
Ukraine	Chapter 23 (Judiciary and Fundamental rights)	Continue developing an inclusive environment for persons with disabilities, including by advancing on de-institutionalisation and, in line with the Ukraine Plan, adopting the legislation on the rehabilitation of persons with disabilities.	
	Chapter 19 (Social Policy and employment)	Continue reforming the social benefits system and implement the new procurement system for social services and further align national legislation with the EU <i>acquis</i> on non-discrimination and equality between women and men in employment and social policy.	



Angela Frolov, Leo Zbancă, Randi Lukian and Marin Pavlescu  
from GENDERDOC-M at Moldova Pride 2025, Chisinau, Moldova  
Photo: GENDERDOC-M

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