The bare minimum as the new standard: The EU Gender Equality Strategy 2026–2030 analysed

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The European Commission released its revised EU Gender Equality Strategy for 2026–2030.

TGEU contributed extensively to the consultation process by submitting a detailed position paper, participating in the in-person consultation in Brussels, and holding meetings with relevant stakeholders.

Alongside other civil society organisations, we put forward concrete proposals to remove structural barriers to the rights and justice of women and girls. Yet, the European Commission has once again retained the 'bare minimum' as its benchmark. **Neither trans people nor trans women are mentioned even once in the Strategy.**

The previous strategy at least referenced gender identity, gender expression and sex characteristics in a footnote. The new Strategy goes further backwards. **The document manages to mention 'diversity' twelve times, yet 'trans women' not once, a striking example of exclusion.** While the new Strategy claims to pay 'particular attention' to certain marginalised communities, these references largely remain confined to footnotes, with little reflection in the substantive text and no meaningful operationalisation of intersectionality.

The Strategy rightly acknowledges the growing backlash against gender equality across Europe. However, it fails to name how this backlash often manifests: the scapegoating of trans people, migrants, racialised people, and other marginalised groups.

Ending gender-based violence against trans women and trans people

TGEU welcomes the Strategy's recognition that robust data is essential to addressing gender-based violence. Continued funding for the EU survey on gender-based violence carried out by Eurostat, as well as cooperation with the European Institute for Gender Equality (EIGE) to improve national data collection practices, are positive steps.

However, as we highlighted during the consultation and during engagement with EIGE, current EU data collection practices fail to capture violence against trans people. Official systems must be adapted to identify and record violent crimes committed against trans people, including trans sex workers.

The Strategy's focus on gender-based violence in the digital sphere is also welcome. Engagement with very large online platforms, very large online search engines, and trusted flaggers must include tools to counter anti-trans violence and harassment online, which are rooted in the harmful gender norms and stereotypes acknowledged throughout the Strategy.

Finally, encouraging the remaining Member States to ratify the Istanbul Convention remains an important and necessary step.

Ensuring equal access to healthcare for trans people

The Strategy refers to 'LBTIQ+ women' only once in the body of the text, noting that discrimination in treatment leads to intersecting inequalities in healthcare. While we welcome the acknowledgement that trans people

experience disproportionate discrimination in treatment, this narrow framing overlooks the broader barriers trans people face in healthcare.

These include:

- Pathologising, costly, or unavailable trans-specific healthcare
- Restricted access to HIV prevention and care
- Hormone shortages across the Union
- Legal and policy barriers to accessing healthcare
- Barriers to cancer screening, contraception, and preventive healthcare due to legal gender markers
- Sterilisation requirements for legal gender recognition, which still exist in four EU Member States

None of these structural issues are addressed in the Strategy.

For a policy document that claims to be inclusive of the entire EU population, this selective recognition creates hierarchies of equality among women.

TGEU also stresses that any new framework for systematic data collection on sexual and reproductive health and rights, promised in the Strategy, must explicitly include trans people.

Economic inequality facing trans women

TGEU welcomes the additional funding dedicated to supporting the implementation of the Pay Transparency Directive. We encourage the European Commission to work with trans-led civil society organisations to ensure that trans-inclusive transposition and pay-gap reporting are possible at national level. We have already identified barriers and shared them with the Commission in a dedicated meeting.

The Strategy's references to 'women in situations of vulnerability' within the context of social exclusion remain vague and underdeveloped. In practice, single parents appear to be the only group explicitly recognised.

This overlooks evidence already highlighted by the European Parliament: trans people are significantly more likely to experience poverty, affecting both themselves and their families. Trans women, in particular, are nearly three times as likely to be unemployed. Migrant, racialised, and sex worker communities face intensified forms of economic marginalisation.

The Strategy also misses an opportunity to encourage Member States to explicitly prohibit discrimination on the grounds of gender identity and gender expression in national anti-discrimination legislation.

Similarly, the proposed efforts to address the gender pension gap appear to focus on only a narrow segment of the women's population, overlooking the structural disadvantages faced by many others.

The European Parliament and civil society highlight the Strategy's gaps

On 18 February, TGEU welcomed the European Parliament's Recommendation to the Council on EU priorities for the 70th session of the UN Commission on the Status of Women (CSW), which emphasised the importance of fully recognising trans women as women, noting that their inclusion is essential for the effectiveness of gender equality and anti-violence policies.

The European Parliament has consistently maintained this position in its calls to the European Commission on multiple occasions, echoing demands from civil society. **TGEU will continue working with the European Commission to prevent any backtracking on trans-inclusive gender equality and to ensure that policies**

meaningfully apply to all women and girls, in all their diversity. We now call on Member States to translate the Strategy and its commitments into meaningful, trans-inclusive national action.

Your support makes change possible

We work across Europe and Central Asia to advance trans rights, build strong communities, and drive change through research, advocacy, and community-building.

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