



Enforcing rights, advancing equality: From the Pay Transparency Directive to the new Gender Equality Strategy

Adopted at the Executive Committee meeting of 19 & 20 November 2025

What is at stake?

This document sets out the ETUC's future priorities on gender equality, building on recent developments. Gender equality seems to have lost traction from the European Commission's side, despite significant progress in the last term, including the Pay Transparency and Violence Against Women Directive, among other, now in transposition. At the same time, backlash is growing at European and international level. The US administration's attempt to roll back DEI policies, together with far-right campaigns against equality measures, reflect two facets of the same regressive agenda. This occurs against persistent gender inequalities in the labour market, where the average pay gap stands at 12%, the pension gap at 29%, and women are more likely to be in precarious work, such as involuntary part-time work, and to experience violence and harassment. This draft resolution builds on the adopted resolution "[On the offensive to combat gender-based violence in the world of work](#)" from June 2024.

Women's rights are workers' and trade union rights — not tradable nor commodities. Defending gender equality at work and in society is essential not only to protect the *acquis communautaire* but to uphold the foundations of a democratic, fair, and inclusive society where women organise and lead gender-transformative change.

Defending the Pay Transparency Directive

The transposition of the Pay Transparency Directive is due by 7 June 2026. However, employers' organisations continue to attack the Directive in an attempt to weaken or derogate from its key provisions. Their main lobbying targets include pay transparency and reporting obligations (Article 6 and Article 9) and severely restricting the use of the hypothetical comparator by removing its "single-source" basis (Article 19).

Framed under the guise of "reducing administrative burden," these efforts threaten to undermine a cornerstone of progress for women workers—a directive that was difficult to win in the first place. For the ETUC, defending the full and ambitious transposition of the Directive, including its support for collective bargaining, remains a key priority. Although reassurances have been received from both Commissioner Hadja Lahbib and Commission President Ursula von der Leyen, vigilance remains crucial.

Action points:

- The ETUC and in particular the ETUC Women's Committee will follow through with the Wage Up project, supporting affiliates in the transposition of the Pay Transparency Directive and closely monitoring its transposition, including in the public sector. Affiliates are asked to be in contact with the relevant ministries.



- The ETUC Women's Committee will prepare for potential litigation and infringement procedures, ensuring that legal and strategic tools are ready to defend the integrity of the Directive should Member States fail to comply.

From the Roadmap for Women's Rights to the new Gender Equality Strategy

After consultations with the ETUC Women's Committee and reassurances from Commissioner Hadja Lahbib that the Pay Transparency Directive would be fully implemented without dilution, the ETUC gave conditional endorsement to the Roadmap for Women's Rights. The ETUC actively contributed to its development, taking part in the social partners' hearing in January 2025 and submitting written comments. The roadmap should pave the way to the new Gender Equality Strategy 2026–2030, that the European Commission will present on 8 March 2026. The ETUC demands that the upcoming Gender Equality Strategy advances gender justice through concrete legislative and policy action — notably to prevent and eradicate all forms of gender-based violence and harassment in the world of work. The Strategy must deliver tangible, measurable progress for women in all their diversity.

ETUC [key demands for the new Gender Equality Strategy](#) are: 1) Binding measures preventing and eradicating gender-based violence in the world of work, offline and online, including on domestic violence, 2) Full implementation of equal pay for work of equal value, in particular through the Pay Transparency Directive; 3) Mainstreaming gender equality into delivering adequate wages and quality jobs including in all future initiatives on AI, psychosocial risks, telework and the right to disconnect; 4) Strengthening gender-responsive measures in occupational safety and health; 5) Investing in public services, towards high-quality, and affordable care services and quality jobs for public service workers, such as health care workers; 6) Safeguarding fundamental and reproductive rights, improving access to free, legal and safe abortion, 7) Mainstreaming support for collective bargaining and social dialogue and 8) Fostering economic equality and financial independence, including through the European Semester.

Action points:

- The ETUC and the ETUC Women's Committee will intensify advocacy work for a strong Gender Equality Strategy delivering the abovementioned priorities by putting together an advocacy and outreach toolkit. The new Strategy will be thoroughly assessed and presented to the Executive Committee in 2026.
- An ETUC Women's Committee action with support of ETUC affiliates will be put in place for 8 March 2026. Whereas International Women's Day coincides with the publication of the new Gender Equality Strategy, the action should place emphasis on mobilising women workers across Europe on the topic of equal pay and in defense of the Pay Transparency Directive. Possible actions include demonstrations or women's strikes.

Countering the backlash against women's rights and gender equality

Far-right and conservative forces, including within the European Parliament, are seeking to roll back decades of progress on gender equality by attacking equal pay, reproductive rights, and women's economic independence. Under the guise of defending "family values" or opposing so-called "gender ideology", they aim to push women back into the domestic sphere - out of the labour market and the public arena. The far-right exploits the issue of violence against women to advance racist and anti-migrant narratives, diverting attention from structural inequalities and the systemic nature of gender-based violence. It seeks to weaken equality and non-discrimination laws, or landmark texts, like the Istanbul Convention, to strip women of their economic independence, and to reimpose a patriarchal male-breadwinner model. Through social media, the far-right spreads toxic masculinity that glorifies aggression, dominance, and anti-feminist attitudes, particularly targeting young men.



Action points:

- The ETUC Women's Committee will intensify its efforts to counter the far-right and all attempts to dismantle gender equality and women's rights, including sexual and reproductive health and rights. This will be done, among other, through existing structures, such as the Bread and Roses Action Centre.
- The ETUC Women's Committee reiterates its urgent call for the ratification of the Istanbul Convention and for countries who have ratified to maintain their engagement accordingly.
- The ETUC Women's Committee will develop a new project to strengthen the organisation and mobilisation of young women workers and counter anti-equality narratives in workplaces and society.

Supporting young women in our movement

Supporting young women within our movement is essential to strengthening gender equality and fostering renewal. ETUC and its affiliates must actively create spaces where young women's voices are heard, valued, and empowered to lead, from collective bargaining and social dialogue, workplace representation to trade union leadership. This means prioritising mentorship, (leadership) training, and continuing to build safe environments free from harassment or discrimination, including online.

Action Point:

- The ETUC Women's Committee works actively on its Youth Action Plan. In cooperation with the ETUC Youth Committee, the Committee will prioritize building bridges for young women trade unionists and workers in the trade union movement, including towards leadership in Europe.

Conclusions and next steps

The ETUC stands at a pivotal moment for gender equality in Europe. Ensuring full implementation of the social *acquis* — notably the Pay Transparency Directive — shaping an ambitious Gender Equality Strategy, resisting far-right backlash, and empowering young women in unions are central to defending women's rights and social justice. From spring 2026, the Women's Committee and its Presidium will prepare for the 2027 ETUC Congress, marking the 70th anniversary of the Treaty of Rome and its principle of “equal pay for equal work” — a milestone to reaffirm the ETUC's lasting commitment to equality.



Annex I

Transposition of the Pay Transparency Directive and challenges

The EU Pay Transparency Directive aims to promote equal pay for equal work and work of equal value by strengthening pay transparency measures and enforcement across Member States. If properly transposed, the Directive has the potential to be a major step forward in closing the gender pay gap. The ETUC has been actively monitoring the transposition of the Pay Transparency Directive, in force since 10 May 2023 and to be transposed by Member states by 7 June 2026.

The Directive is currently facing significant pushback from certain employer organisations, particularly Business Europe, which has proposed several amendments that would weaken key provisions. Included in Business Europe's "68 proposals for simplification" from January 2025 and reaffirmed through a letter to the attention of Commission President Von der Leyen dated 15 July 2025, Business Europe aims to

- Article 6 (Transparency of pay setting and pay progression policy): Proposal to exclude all companies with fewer than 50 employees from the transparency obligations.
- Article 9 (Pay reporting):
 - Proposal to exclude all SMEs with fewer than 250 employees from reporting requirements.
 - Suggestion to apply a presumption of appropriateness for collective bargaining agreements (CBAs) not only under Article 9, but also under
 - Proposal to limit reporting obligations to the gender pay gap only, removing other reporting elements.
- Alignment with other EU legislation: BusinessEurope has also suggested aligning reporting obligations under the Pay Transparency Directive with the Corporate Sustainability Reporting Directive (CSRD).
- Article 19 (Hypothetical comparator): BusinessEurope proposes limiting comparisons to workers within the same company or organisation, removing the "single source" principle. This would restrict the ability of workers to use hypothetical or cross-organisation comparisons when assessing pay discrimination.

In response, the ETUC has, with support of the ETUI, dedicated European (Un)Equal Pay Day (15 November 2025) and International Women's Day 2025 to defending the Directive. Under the slogan "Women workers won't foot the bill!", we have illustrated that the proposed exemptions would have serious consequences:

- Excluding companies with 100–250 employees would affect over 10 million working women in Europe.
- These workers would lose access to information about pay inequalities in their workplace.
- The total estimated cost to affected women workers is at least €4.8 billion per year.

Further, ETUC [has reached out to all Permanent Representatives](#), correcting the incorrect claims put forward by BusinessEurope.



Building up on the extensive work done to meaningfully amend and to deliver the Directive in the first place, the ETUC has participated to four transposition workshops organised by the European Commission (DG JUST). ETUC has consistently reported back to the Women's Committee and integrated affiliates' questions and remarks in the transposition workshops.

In the framework of the Wage-Up project the ETUC is supporting affiliates towards an ambitious transposition of the Directive.



Annex II

Background on the Roadmap for Women's Rights

On 8 March 2025, the European Commission has published its Roadmap for Women's Rights. The ETUC had contributed to this initiative through a social partner hearing and written comments (January 2025-February 2025). The Roadmap sets out eight principles on gender equality, covering important aspects such as equal pay, work life balance, and the fight against gender-based violence, among others ([full text available here](#)). It should be noted that some of the ETUC demands to the Roadmap were taken into account and reflected in the final text, namely:

- Principle 3 makes reference to “ensuring pay transparency”
- Principle 4 makes reference to “promoting investment and formal employment in the care sector, ensuring quality care jobs”
- Principle 5 now includes “gender-based violence and sexual harassment in the world of work” (instead of just “sexual harassment”). Furthermore, health and safety is expressly mentioned.
- Principle 6 makes reference to zero-tolerance for gender-based violence, harassment and bullying in education
- Principle 7 now includes “gender-sensitive spatial planning and transport infrastructure”

The Roadmap is put forward as a political declaration based on voluntary support by Member states and stakeholders. It does not contain any concrete, nor binding measures. The ETUC has repeatedly criticised this approach, highlighting the lack of enforceable commitments, the unclear endorsement process, and the risk of making gender equality appear “optional.” On 25 July, the ETUC was invited by Commissioner Lahbib to endorse the Roadmap for Women's Rights and join a celebratory event on 16 October 2025. Following a consultation and recommendation of the Women's Committee, the ETUC has written to the Commissioner, signalling an ETUC endorsement of the Roadmap upon three main conditions, notably: A translation of the Principles into concrete legislation and policy, full implementation and enforcement of existing legislation in the field of gender equality and support of trade unions and social partners. We have stressed that the Roadmap must prove its worth through the upcoming gender equality strategy, due to be published on 8 March 2026. Given the reassurances received during a meeting with Commissioner for Equality Hadja Lahbib, the ETUC has conditionally endorsed the Roadmap and participated to the event on 16 October 2025. The ETUC and its Women's Committee were represented by Gloria Mills, at this time President of the Women's Committee.



Annex III

Summary of demands for the upcoming Gender Equality Strategy

The ETUC Women's Committee has contributed to the consultation process for the upcoming gender Equality Strategy through a social partners' hearing on 25 June 2025 and [subsequent written comments](#), resumed hereunder.

Introduction

Gender equality is a treaty-based obligation; the Strategy must deliver binding measures, funding, targets, and timelines, not soft pledges. It should resist deregulation/austerity agendas that erode women's rights and embed strong roles for social partners, social dialogue, and collective bargaining with an explicit intersectional lens (migrant, racialised, disabled, LGBTQI+ women, etc.).

The Strategy must:

- Include new legislative initiatives and ensure full, ambitious transposition and enforcement of existing EU law.
- Include transversal support for social partners, social dialogue and collective bargaining
- Secure adequate MFF funding and gender-responsive budgeting; integrate gender objectives in the European Semester.
- Mainstream the world of work across the Strategy (close DG JUST–DG EMPL cooperation).
- Reject “competitiveness” narratives that justify deregulation or weaken pay, OSH and equality safeguards.

Priorities:

1) Preventing and eradicating gender-based violence (GBV) in the world of work

- New binding measures in form of a Directive tackling all forms of work-related GBVH: sexual harassment, third-party violence, cyberviolence, and domestic /economic violence—with intersectional provisions, prevention, risk assessment, training, and anti-victimisation measures.
- Support ILO C190 & R206: EU-wide ratification/implementation monitoring and gap-filling measures.
- Systematically integrate GBVH prevention in OSH, including forthcoming files on AI at work and a Directive on psychosocial risks; include cyberviolence as a workplace issue.
- Improve data collection on GBV at work and strengthen democracy at work to prevent GBV.

2) Equal pay & equal pay for work of equal value

- Concrete measures toward full, timely transposition of the Pay Transparency Directive, with Commission oversight, infringement where needed, and resistance to any weakening
- Complementary measures to address undervaluation of jobs predominantly done by women (care, education, public services) and bolster collective bargaining.
- Explore a European job evaluation tool and company-level pay registers; advance a clearer EU understanding of “equal value.”



- Ensure robust implementation of the Adequate Minimum Wages Directive.
- Tackle horizontal/vertical segregation

3) Care and public services

- Public investment to expand affordable, quality care (child, elder, disability) and reduce unpaid care burdens.
- Guarantee quality jobs in care: fair pay, stable contracts, inspections, protection from third-party violence, recognition of occupational diseases.
- Formalise and professionalise domestic/home care work, promote collective bargaining, and support ILO C189 ratification.
- Use the European Semester to adapt welfare systems and address territorial inequalities; promote 100% paid parental/paternity leave.

4) Quality jobs

- Embed a gender dimension in the Quality Jobs Package, fully in line with ETUC demands, and EPSR implementation.
- Measures against in-work poverty, precarious/fixed-term and involuntary part-time work; protect against discriminatory national reforms.
- Enforce Women on Boards and extend targets to senior management; improve statistics to reveal hidden gaps.
- Address labour shortages by improving conditions, WLB, mobility/housing, and gender-sensitive skills/VET.
- Legislative agenda to include Just Transition at work (with training rights/SURE 2.0); regulation of labour intermediaries/subcontracting (joint liability); psychosocial risks/online harassment Directive; AI at work Directive; Telework & Right to Disconnect; stronger worker information/consultation/participation.

5) Artificial intelligence

- Mainstream gender and workplace dimensions across AI policy; combat algorithmic bias and links to cyberviolence (deepfakes, image-based abuse).
- Go beyond “human in control” with a specific AI at work Directive and effective bans on emotional monitoring; consider a dedicated supervisory authority with media focus.

6) Occupational health & safety and inclusive workplaces

- Gender-responsive OSH reform and Action Plan (with EU-OSHA/EIGE/social partners) covering PPE design, psychosocial risks, SRHR, menstruation/menopause/breast-feeding.
- Mandatory gender-based risk assessments; more research on gendered exposures (e.g., CMR, MSDs, stress).
- Include domestic workers within OSH protections; ensure inclusive coverage of LGBTQ+ and intersex workers.

7) Safeguard fundamental rights (SRHR)

- Anchor SRHR—including access to free, legal, safe abortion—under the EU Charter, with labour/OSH relevance.

8) Work-life balance & anti-discrimination



- Enforce the Work-Life Balance Directive (paid parental leave, flexible work, right to disconnect, etc), sanction non-compliance, and counter pregnancy/parental-leave discrimination.
- Monitor and address national measures that increase discrimination.

9) Education, skills & VET

- Quality jobs and better conditions in education; fund public education.
- Early education for equality, consent and respectful relationships; compulsory gender-equality training for key professions.
- Reverse defunding of equality bodies; tackle gender gaps in STEM/green/digital pathways; ensure paid VET/up-/reskilling time with intersectional access.

10) Gender budgeting & economic policy

- Ensure MFF 2028–2034 resources for gender equality; strengthen gender-sensitive monitoring of EU funds (e.g., NRPs).
- Improve statistics and gender budgeting in economic governance; prioritise economic empowerment and financial literacy; counter austerity.

11) External & trade policy

- Integrate gender across FTAs (SDG 5), the European Semester (internally) and NDICI Global Europe (externally); deepen cooperation with ILO/UN and CEN/CENELEC–ISO on gender-sensitive standards.