

# Submission to the European Commission on the 2026-2030 EU Anti Racism Strategy

Pavee Point has been working to challenge racism and promote Traveller and Roma inclusion in Ireland since 1985. The organisation works from a community development perspective and promotes the realisation of human rights and equality for Travellers and Roma in Ireland. The organisation is comprised of Travellers, Roma and members of the general population, who work together in partnership to address the needs of Travellers and Roma as minority ethnic groups experiencing exclusion, marginalisation and racism. The central aim of Pavee Point is to contribute to the improvement in the quality of life and living circumstances of Irish Travellers and Roma.

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#### Introduction

As minority ethnic groups, Travellers and Roma experience systemic racism and discrimination on the basis of ethnicity, gender and other grounds. As a result, Travellers and Roma are among the most marginalised and excluded individuals and groups in Ireland and across Europe. Pavee Point holds to the principle that in order to achieve equality for Travellers and Roma, attention must be paid to the structural inequalities and racism that impact them, across all areas, including education, employment, poverty, and health. This means that planning, policy and practice must be underpinned by an inter-cultural approach and by principles of equality, diversity and anti-racism to support positive outcomes.

The European Commission launched the EU Anti-racism Action Plan (2020-2025) in September 2020 and this marked the EU's first explicit acknowledgment of institutional racism and the need to develop systemic solutions. As part of the plan, EU member states were also asked to adopt National Action Plans Against Racism (NAPARs).

This was an important first step, but unfortunately, despite these positive developments in terms of policy at both the European and National level,¹ the issue of institutional anti-Traveller and anti-Roma racism persists. Pavee Point has increasing concerns about the rise of far-right rhetoric and far right politics in Ireland and across Europe, and targeted hate towards minority ethnic groups, including Roma. This has impacted the Roma community's sense of safety, particularly those living in areas affected by the Dublin and Ballymena riots and other antimigrant protests.

The next iteration of the EU Anti Racism Strategy and its mechanisms for supporting Ireland's National Action Plan against Racism (NAPAR are important tools for promoting inclusion of Travellers and Roma and acknowledging the intersectionality between racism and multiple forms of oppression.

This paper will highlight some key recommendations to support the effective and full implementation of anti-racism measures at both the European and National level, ensuring that anti-Traveller and anti-Roma racism are considered and included.

## **Recommendations:**

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- Name anti-racism and equality as a priority across EU and EU Commission Agendas
- EU to adopt a Council recommendation on NAPARs to provide clear guidance to EU member states on this policy area
- Develop and resource standardized monitoring measures for NAPARs, similar to the Roma Civil Monitor, to ensure accountability by member states
- Reform the CSO anti- racism forum and provide secure funding for meaningful Civil
   Society involvement at the EU, national, regional, and local levels
- Include specific measures to address anti-Traveller and anti-Roma racism, including supporting the full implementation of the EU Roma Framework 2020-30

<sup>&</sup>lt;sup>1</sup> including the EU Roma Strategic Framework, the EU Anti Racism Action Plan and the National Traveller and Roma Inclusion Strategy (NTRIS) and National Action Plan Against Racism (NAPAR), Traveller and Roma Education Strategy, National Traveller Health Action Plan

- Include measures to ensure the **immediate full transposition of the Hate Directive** by countries who are not fully compliant, including Ireland.
- In order to monitor progress at the EU and national level, include **clear actions on the collection, analysis and publication of disaggregated equality data** across all administrative systems and services in line with human rights standards.
- Include provisions in the EU Anti-Racism Strategy to establish an independent EU-level oversight body to monitor the racialised impacts of EU migration policies
- **Prioritise addressing poverty**, in connection with the upcoming anti-poverty strategy (2026), and include disaggregated equality data, targets and indicators in policies, such as European Pillar of Social Rights

### Improving the Effectiveness of the New EU Anti-Racism Strategy

To strengthen the next iteration of the EU Anti-Racism Strategy, it is important that the document has a clear framework rooted in human rights obligations and a deepened systemic approach to tackling racism. This framework would include clear definitions, mainstream and targeted actions, mechanisms for meaningful participation of those experiencing racism, and effective data collection and impact assessments. The next strategy must address structural racism within institutions, criminal justice systems and public services, rather than centring its focus on individualised issues such as addressing incidents of hate speech and hate crimes. For effective implementation, the strategy needs adequate resources and a clear political commitment, with equality and anti-racism named and prioritised across EU and EU Commission agendas. This is particularly important now, more than ever, considering the recent diminishing of the Equality Portfolio at the EU level<sup>2</sup>.

#### Recommendations:

- Develop a clear framework, rooted in international human rights and focused on systemic racism, with adequate resourcing, clear timelines, indicators, and monitoring mechanisms
- Name anti-racism and equality as a priority across EU and EU Commission Agendas

## National Action Plans Against Racism (NAPAR) - Implementation and Accountability

As it currently stands, despite being governed by EU Commission Principles, the implementation of National Action Plans Against Racism, developed by Member States, is conducted in the absence of monitoring and accountability processes. In the interests of creating common standards at a European level, it would be useful for the Commission to introduce standardised accountability measures. For example, a similar system to the Roma Civil Monitor could be established, where funding is provided to a CSO led monitoring system to provide analysis at a national level from those directly affected by racism. The EU could also consider adopting a Council recommendation on the NAPARs, providing clear guidance to EU member states on this policy area.

#### **Recommendations:**

 EU to adopt a Council recommendation on NAPARs to provide clear guidance to EU member states on this policy area

<sup>&</sup>lt;sup>2</sup> appointment of a Commissioner, Hadja Lahbib, to oversee a fractured Equality portfolio, together with Crisis Management and Preparedness. The EU's decision to disconnect it from core justice departments, pushing racial equality to the margins of the political agenda.

Develop and resource standardized monitoring measures for NAPARs, similar to the Roma
 Civil Monitor, to ensure accountability by member states

## A Partnership Approach with Civil Society

To be successful in addressing racism and discrimination, the crucial role of civil society in codeveloping solutions must be acknowledged at the EU, national, regional and community levels. This means meaningful involvement of civil society and those affected by racism in the Strategy's consultation, drafting and monitoring processes, as well as provisions for similar processes at the NAPAR level. This recognises and gives parity of esteem to civil society's expertise and knowledge and ensures that actions truly meet the needs identified by communities affected by racism. In order to facilitate this partnership approach, civil society organisations need to be adequately resourced and supported.

**Recommendation:** Reform the CSO anti- racism forum and provide secure funding for meaningful Civil Society involvement at the EU, national, regional, and local levels

#### **Inclusion of Anti-Traveller and Anti-Roma Racism**

It is important that anti-Traveller and anti-Roma racism are named explicitly and that Travellers and Roma are included in the next iteration of the EU Anti Racism Strategy. Measures should prioritise the mainstreaming of Travellers and Roma across all EU strategies, the full implementation of the EU Roma Framework 2020-2030, as well commitment to the effective development and resourcing of its successor strategy by 2030.

**Recommendation:** Include specific measures to address anti-Traveller and anti-Roma racism, including supporting the full implementation of the EU Roma Framework 2020-30

#### **Protection Against Hate Crime and Hate Speech**

Ireland was late to enact Hate Crime legislation in 2024. This was welcomed, but we note with concern and disappointment, the removal of specific provisions addressing hate speech. This leaves Travellers and Roma without a crucial additional layer of protection against targeted abuse and incitement. According to the European Commission, Ireland is now failing to comply with European law surrounding the criminalisation of race-based violence and hatred. The EU Anti Racism Strategy must push for the immediate full transposition of the Hate Directive by countries who are not fully compliant, including Ireland.

The Strategy can also play a role in preventing hate crimes against minority ethnic groups, including Travellers and Roma, with guidance on special measures to support hate legislation, such as targets to reduce the number of race hate crimes, anti-racism training for all criminal justice personnel, and guidelines on working on cases involving a racist/hate element.

**Recommendation:** Include measures to ensure the immediate full transposition of the Hate Directive by countries who are not fully compliant, including Ireland.

## **Ethnic Equality Monitoring**

Lack of disaggregated data by ethnicity results in failure to provide an ongoing evidence base of the situation of minority ethnic groups, including Travellers and Roma, and in failure to undertake comprehensive human rights and equality proofing of policies, budgets and programming. In Ireland, concerns at the lack of disaggregated data in formulating and

<sup>&</sup>lt;sup>3</sup> European Commission calls on Ireland, Bulgaria and Estonia to correctly transpose EU law combating racism and xenophobia

monitoring policy and programming, have been raised by various human rights bodies<sup>4</sup> and there have been significant delays in the publication of the National Equality Data Strategy. The EU Anti-Racism strategy and related NAPAR can play an important role in setting clear actions for EU member states on equality data collection, use and monitoring.

**Recommendation:** In order to monitor progress at the EU and national level, include clear actions on the collection, analysis and publication of disaggregated data by ethnicity, and gender across all administrative systems and services in line with human rights standards.

#### **Migration Policy**

Migration cannot be treated in isolation from anti-racism efforts. The application of the Migration Pact and associated legislation is in danger of embedding racism in EU systems – focusing on severe immigration controls, and militarisation. This all leads to the systematic exclusion of racialised communities, migrants, and minorities and is counter to EU commitments to human rights and equality. EU level oversight is needed to monitor the racialised impacts of these extreme migration policies.

At a national level, we have seen a change in prioritisation and language in Ireland's recent Programme for Government<sup>5</sup>, which lacks meaningful commitments in relation to human rights and equality, with the section on racism particularly weak with no reference to the National Action Plan against Racism. The language in relation to migration is also concerning, with a stronger focus on tighter controls rather than meaningful integration and inclusion, feeding into some of the current far right rhetoric and politics present across Europe.

**Recommendation:** Include provisions in the EU Anti-Racism Strategy to establish an independent EU-level oversight body to monitor the racialised impacts of EU migration policies

#### **Prioritise Socio-economic Actions**

Poverty disproportionately impacts marginalised groups, including Travellers and Roma, due to high levels of unemployment, health inequalities, and high levels of homelessness. The EU Anti Racism Strategy must acknowledge the socio-economic impacts of racism and prioritise addressing poverty and social exclusion. These measures should be developed in alignment with the upcoming EU anti-poverty strategy<sup>6</sup> (due for publication in 2026).

This has the potential to influence national anti-poverty approaches. Currently, in Ireland there is a lack of adequate data collection and targeted poverty reduction measures regarding Traveller and Roma children and families. There are no dedicated targets for reducing Traveller and Roma poverty in key mainstream policy initiatives, including the current Roadmap for Social Inclusion<sup>7</sup>. Traveller and Roma organisations have been working closely with the State to influence the development of the next strategy, currently under development.

**Recommendation:** Prioritise addressing poverty, in connection with the upcoming anti-poverty strategy (2026), and include disaggregated equality data, targets and indicators in policies, such as European Pillar of Social Rights

<sup>&</sup>lt;sup>4</sup> Most recently in the Concluding Observations from the CEDAW Committee on Ireland 57(b) CEDAW/C/IRL/CO/8

<sup>&</sup>lt;sup>5</sup> <u>Programme for Government 2025 - Securing Ireland's Future</u>

<sup>&</sup>lt;sup>6</sup> European Commission: Addressing poverty and supporting social inclusion

<sup>&</sup>lt;sup>7</sup> Government of Ireland. Roadmap for Social Inclusion 2020-2025