

**To: European Commission
Directorate-General for Justice and Consumers
Gender Equality Unit
Brussels, Belgium**

Subject: Position of Foundation “Independent” on the Inclusion of Addiction in the EU Gender Equality Strategy (2026–2030)
Date: [08.08.2025]

Dear Members of the European Commission,

We are writing on behalf of **Foundation “Independent”**, a newly established Bulgarian non-governmental organization (February 2025), founded by a multidisciplinary team of professionals with long-standing expertise in **addiction recovery, trauma-informed care, gender-based violence prevention, and psychosocial rehabilitation**.

We strongly support the European Commission’s commitment to building a more equal and inclusive Europe and welcome the opportunity to contribute to the new **EU Gender Equality Strategy 2026–2030**. As practitioners working directly with **women with substance use disorders, including pregnant women and mothers with children**, we believe that gender equality efforts must **urgently address addiction as a gendered and intersectional issue**. That this topic should be explicitly included within the principle of **The highest standards of health**.

1. Why Addiction Belongs in Gender Equality Policy

Addiction among women is a growing but largely invisible crisis in Europe. It is deeply connected to **gender-based violence, poverty, mental health, and motherhood**. Women with substance use disorders face:

- Higher levels of stigma, especially when they are mothers;
- Greater barriers to accessing treatment due to caregiving responsibilities or fear of losing custody of their children;
- Increased risk of violence, trauma, and marginalization;
- A lack of **specialized, trauma-informed, women-only services** across Member States.

Despite this, addiction is rarely addressed in gender equality strategies and remains siloed as a “health” issue rather than a complex **social and gender justice matter**.

2. Gaps in the Current Policy Landscape

In our work, we observe significant gaps in the recognition and response to women affected by addiction:

- Lack of **gender-specific services** that accommodate childcare, pregnancy, and the social realities of women in recovery;
- Absence of **trauma-informed approaches** that consider the impact of violence and abuse;
- Little integration between addiction services and broader gender equality or anti-poverty policies;
- Inadequate support for **mothers in recovery**, many of whom face punishment instead of help.

These gaps contribute to **ongoing cycles of stigma, relapse, and exclusion**, especially among the most vulnerable.

3. Recommendations for the 2026–2030 Strategy

We urge the Commission to integrate addiction into the new Gender Equality Strategy through the following actions:

a. Explicit Recognition

- Recognize women with addiction and recovery needs as a **priority group** in gender equality, health equity, and social inclusion efforts.

b. Funding and Support for Women-Centered Services

- Invest in **community-based, integrated programs** that provide addiction recovery alongside mental health care, housing, legal support, childcare, and parenting assistance.

c. Protection of Mothers and Pregnant Women

- Ensure that all EU Member States offer **accessible, non-punitive, and adequately funded** maternity and parental leave options, including for women in recovery.
- Prioritize **family preservation and alternatives to child removal**, with services that support the mother-child relationship.

d. Training and Awareness-Raising

- Promote EU-wide training for professionals (social workers, health workers, educators) on **gender-responsive, trauma-informed approaches** to addiction.
- Challenge stigma through communication campaigns and **inclusion of lived experience voices** in policy design.

e. Cross-Sector Collaboration and Research

- Support Member States in developing **coordinated strategies** across health, justice, education, and gender equality sectors.
- Promote research on **gender and addiction** as a basis for evidence-based policymaking.

4. Our Commitment and Call to Action

At foundation “**Independent**”, we are building programs that respond to the real needs of women in vulnerable situations – including **non-residential and residential care, group work, skills-building, and community reintegration**. Our team of psychologists, social workers, and peer support leaders is committed to making recovery visible, accessible, and empowering for women.

We believe the new EU Gender Equality Strategy must boldly address **the structural barriers faced by women with addiction**. This includes acknowledging the interconnectedness of **trauma, poverty, violence, motherhood, and recovery**. By including these realities in the strategy, the EU has the opportunity to make equality truly inclusive.

We would be honored to contribute further to this dialogue and to collaborate in the development of good practices at EU level.

Thank you for your attention and for your commitment to building a more equal and caring Europe.

Sincerely,
Ivelina Mincheva
Chair of the Board

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